

## Ardagh Group Modern Slavery and Human Trafficking Statement

### Introduction

This statement is made by Ardagh Group S.A. (“Ardagh”) and all relevant subsidiaries (the “Ardagh Group”) pursuant to their obligations under both section 54(1) of the Modern Slavery Act 2015 and the California Transparency in Supply Chains Act.<sup>1</sup> This statement sets out the steps we have taken to combat modern slavery in both our organisation and supply chains during the year ending December 31, 2022.

In this statement, the term “modern slavery” is inclusive of all forms of modern slavery, including human trafficking, forced labour and child labour.

### Our organisational structure

We are a leading supplier of sustainable, infinitely recyclable, metal and glass packaging for brand owners around the world.

As at 31 December 2022, we operated 65 production facilities in 16 countries (in the Americas, Europe and Africa) and employed approximately 21,000 personnel.

### Our supply chain

Our main inputs include energy, raw materials, consumables, components, packaging and logistics. Most of these inputs are sourced within the regions in which we operate.

Our procurement strategy is to promote long term business relationships and, where possible, to conduct business directly with suppliers and manufacturers to ensure the materials and services we source are ethical from origin.

### Our commitment to human rights and our key policies

We are committed to ensuring modern slavery does not exist within our business and supply chain. We have two key documents to support this commitment:

- 1) our Code of Conduct; and
- 2) our Responsible Procurement Policy.

#### *Code of Conduct*

Our Code of Conduct includes our Social Sustainability Policy, detailing our commitment to human rights, and our Employment Policy, which sets out our fundamental employment principles and rights for employees (including rights of freedom of association and collective bargaining).

Our Code of Conduct encourages all staff to report any concerns relating to non-compliance with

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<sup>1</sup> This statement covers all Ardagh Group companies worldwide, including Ardagh Glass Limited, Ardagh Metal Packaging Trading U.K. Limited and Ardagh Metal Packaging U.K. Limited. Please note that Ardagh Group’s metal packaging business, including Ardagh Metal Packaging Trading U.K. Limited and Ardagh Metal Packaging U.K. Limited is also subject to its own modern slavery and human trafficking statement.

laws, either directly to management or through our Compliance Hotline on an anonymous basis, without fear of retaliation or discrimination. The hotline is accessible online or by telephone.

Our Code of Conduct has been approved and adopted by the Board of Directors of Ardagh Group S.A. (the “Board”) and it is available to all employees in local languages on Ardagh’s intranet internal portal, as well as publicly on the Ardagh Group website ([link](#)). Amendments to our Code of Conduct must be approved by the Board.

### *Responsible Procurement Policy*

Our Responsible Procurement Policy outlines the standards we require of our suppliers, including as regards social, ethical and environmental matters, including modern slavery. This policy sets out how we monitor adherence to our requirements (based predominantly on the Ethical Trading Initiative Base Code principles) and the consequences faced by a supplier should they not adhere to all requirements. We review our Responsible Procurement Policy and its associated procedures on an annual basis and it is available on the Ardagh Group website ([link](#)).

In addition, to reduce the risks of human trafficking and migrant smuggling, our hauliers and logistics providers are required to follow specific procedures to ensure that goods are secured and sealed.

On April 29, 2022, we acquired Consol Holdings Proprietary Limited (“Consol”), the leading producer of glass packaging on the African continent, which has seven production facilities in South Africa, Nigeria, Kenya and Ethiopia.

Prior to our acquisition of Consol, Consol had already demonstrated its commitment to human rights matters, with an internal code of conduct and a supplier code of conduct. Both documents contained the same commitments in relation to forced labour, slavery, human trafficking, and child labour as those set out in our Code of Conduct and Responsible Procurement policy. As part of the integration of Consol into our organisational structure, our glass packaging business in Africa has adopted our Code of Conduct and the Consol supplier code of conduct remains applicable.

## **Our approach to supply chain verification and audit**

### **Assessing and managing risk**

We have implemented a risk-based management system, which helps us to identify and manage potential social, ethical, and environmental risks across our supply chain, including modern slavery risks.

#### *Desktop risk assessment*

Each year we conduct internal desktop risk assessments on a selection of suppliers. We consider multiple factors when deciding on which suppliers to assess, which include, among others, industry, geography and their respective risk of human rights abuses (such as modern slavery).

These internal desktop risk assessments consider information from multiple sources, which include information from supplier questionnaires, independent risk indices, and online media sources.

Our suppliers are reassessed on a regular basis. The frequency of reassessment (between 1 to 3 years) is determined by the outcome of the previous risk assessment. The outcomes of the

internal desktop risk assessments are shared with the relevant suppliers to improve risk mitigation measures.

### *On-site Audits*

Depending on the outcome of an internal desktop risk assessment, a supplier may be required to undergo an on-site ethical audit, either conducted by our representatives or by a third party. These ethical audits cover social (including modern slavery), environmental and health and safety matters. Such audits typically include of a site tour, records review and worker interviews.

We consider third-party audits to be preferential for suppliers within higher risk geographies. We do not currently conduct unannounced audits.

In 2022, all audits were undertaken on a desktop basis, due to ongoing travel restrictions associated with COVID-19. On-sites audits will be resumed in 2023.

### *Additional mitigation measures*

In addition to our standard risk assessment and audit process, where we are aware of heightened potential of human rights breaches, we may introduce additional mitigation measures.

As modern slavery risks are generally higher in Brazil and Africa, we have introduced additional mitigation measures when dealing with suppliers in these jurisdictions. These include regular communications with suppliers on ethical employment practices and worker safety.

A further example is the additional mitigation measures we apply in when sourcing cobalt, as we are aware of the risk associated with the operation of illegal mines, unacceptable working conditions and damage to the environment. The cobalt used in our production process is secured from a supply chain with full traceability back to the origin mine. Our cobalt suppliers are committed to conducting at least two ethical checks per year on the mines and related facilities in high-risk countries and are subject to an annual third-party audit of their practices.

### *Certification*

Through the incorporation of our Code of Conduct and Responsible Procurement Policy in our General Terms and Conditions of Purchase, we ensure that our suppliers respect and enforce our standards, to comply with all applicable laws and regulations and take appropriate steps to ensure there is no modern slavery in their business. All suppliers to our glass packaging business in Africa, must similarly confirm and certify compliance with its supplier code of conduct before entering into a contract.

## **Our approach to accountability**

Our Code of Conduct, and all its accompanying policies, apply to all our staff worldwide, all our companies, controlled joint ventures and third parties working on our behalf.

All of our employees are aware of our Code of Conduct and their obligations, and, on employment, certify that they have read, understood, and agree to comply with the Code of Conduct. In addition, we also require certain employees to participate in an annual certification process, including training to raise awareness of specific topics covered by the Code of Conduct.

We encourage all employees to report any concerns, including those regarding modern slavery,

either to local management or through Ardagh's Compliance Hotline.

In the event of any violations of our Code of Conduct, we take appropriate disciplinary actions in accordance with applicable law, which may include termination of employment. A compliance committee, established by the Board, is responsible for the implementation, enforcement, and monitoring of the Code of Conduct.

Our Responsible Procurement Policy applies to all our suppliers. This policy outlines requirements for our suppliers regarding key social, ethical, and environmental topics. Non-adherence may result in cancellation or non-renewal of contracts with suppliers. Serious misconduct, including the use of child labour and inhumane working conditions, is classified as a material breach of our contracts. Our sustainability team, with support from the procurement team, is responsible for monitoring adherence to our Responsible Procurement Policy.

### **Training**

Our procurement team is required to undertake annual online training regarding our policies, to recognise signs of modern slavery and know what steps to take if they encounter such a situation. We have developed similar training for our human resource team, which will be deployed in 2023. As part of the ongoing transition from and onboarding of our policies to our glass packaging business in Africa, training will be provided to the relevant teams in 2023. We will continue to review and develop training to other individuals as appropriate.

### **Responsibility and Effectiveness**

We remain committed to upholding human rights and safety in our business and our supply chain, and we review our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement is made for the year ended 31 December 2022.

During the period covered by this statement, we have found no evidence, nor received any allegations, of modern slavery either within our business or our supply chain.

A handwritten signature in black ink, appearing to read 'Michael Dick', written in a cursive style.

### **Signed by:**

Michael Dick

On behalf of Ardagh Group S.A.

26 April 2023