

Ardagh Group - Modern Slavery Act Transparency Statement

Introduction

Ardagh Group (**Ardagh**) is a global manufacturer of glass and metal packaging solutions for some of the world's biggest brands. We operate 109 facilities across 22 countries worldwide and have over 23,500 employees and a group revenue of over €7.7 billion.

Respect for human rights is an integral part of the corporate social responsibility commitments of Ardagh. We foster an organisational culture that respects dignity and human rights and we believe that conducting business with high ethical trading standards is fundamental to this culture.

Ardagh also recognises that it has a responsibility to take a robust approach to modern slavery and we are committed to improving our practices to combat slavery and human trafficking, both in our own organisation and our supply chains.

In line with the UK's Modern Slavery Act, we are required to formally report on the steps we have taken to combat modern slavery on an annual basis.

This statement therefore sets out Ardagh's actions to understand all potential modern slavery risks in relation to our organisation and to put in place steps aimed at ensuring that there is no slavery or human trafficking in our business and supply chains. This statement relates to actions and activities of those of Ardagh's entities which fall within the scope of the Modern Slavery Act during the financial year up to and including 31 December 2016, namely Ardagh Glass Limited; Ardagh Metal Packaging UK Limited; Ardagh Metal Beverage UK Limited; and Ardagh Metal Beverage Trading UK Limited. However, our approach and the principles we adopt in relation to modern slavery are broadly consistent throughout the Ardagh group worldwide.

Our Business and Supply Chains

Ardagh's business is organised into business units across three main geographic areas. Our American operations include 15 glass and 17 metal manufacturing facilities, plus seven regional offices. Our European operations include 20 glass and 55 metal manufacturing facilities, along with two of Europe's largest glass decoration facilities and our research and

development facilities. Our Rest of the World operations include two metal manufacturing facilities and four offices.

As is to be expected from a large rigid packaging manufacturer, Ardagh receives a significant amount of materials & services. Key supply chains are critical to the business, and as such are managed as commodities, with each having a European Manager assigned to them who relate strategy to regional Procurement Managers for execution. Key supply to our process include; Energy, Raw materials, Moulds, Packaging and Logistics. These commodities have a chosen consolidated number of suppliers who can serve the regions with multi-year service contracts or pricing agreements, which include certain service level agreements and key performance indicators to ensure quality of supply. Ardagh mainly sources its goods within the EU and US.

Our Approach and Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. In light of this, we have reviewed our group wide Procurement policy and Responsible Procurement policy. The Responsible Procurement policy has been updated and the Procurement policy is currently in the process of being updated to include specific considerations in relation to issues of modern slavery, and to reflect our commitment to acting ethically and with integrity in all our business relationships.

From a UK perspective, our pre-qualification questionnaire has also been reviewed and now includes a specific section on modern slavery and human rights. This questionnaire is used for all of our material supply contracts in the UK.

Equally, our Code of Conduct encourages all staff to report any concerns relating to non-compliance with laws on an international, regional national and/or local level. The Group's Compliance Hotline is also designed to make it easy for staff to report any concerns (including in relation to issues of modern slavery) without fear of retaliation.

Our Risk Assessment and Due Diligence Processes

Most of our supply chains are, by design, relatively short. Our business strategy is to conduct business directly with origin or source suppliers and manufacturers to achieve maximum commercial benefit and to ensure corporate and sustainable responsibility.

However, as part of our initiative to identify and mitigate risk, we require any organisations submitting formal tender responses via our procurement team to set out their business practices and policies in relation to labour standards and labour conditions and to satisfy us that they are avoiding ethical conflicts wherever possible. This is done by way of a targeted Pre-Qualification Questionnaire, which is also incorporated into our specific tender documents for larger suppliers. We feel that this approach allows us to identify and assess potential risk areas in our supply chains and to mitigate the risk of slavery and human trafficking occurring in our supply chains.

Our Procurement policy and our Responsible Procurement policy set out the standards we expect of our suppliers during our business relationships. However, we also monitor potential risk areas in our supply chains as part of our supplier audits and reviews and on-site visits.

Our Contracts and Procurement

In addition to the requirements of our Pre-Qualification Questionnaire, we also intend to include appropriate protections in all of our key external supply contracts going forwards, in order to ensure that our suppliers trade ethically and take appropriate steps to ensure there is no slavery or trafficking in their business.

Responsibility and Effectiveness

The Ardagh Group remains committed to upholding human rights and safety in our supply chain and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Modern Slavery Act transparency statement for Ardagh Glass Limited; Ardagh Metal Packaging UK Limited; Ardagh Metal Beverage UK Limited; and Ardagh Metal Beverage Trading UK Limited for the financial year ending 31 December 2016.

Digitally signed by:

Keith Swindell, Director
On behalf of Ardagh Glass Limited

Keith Swindell, Director
On behalf of Ardagh Metal Packaging UK Limited

Michel Lemoyne, Director
On behalf of Ardagh Metal Beverage UK Limited

Simon Gresty, Director
On behalf of Ardagh Metal Beverage Trading UK Limited