

Declaration on Sourcing of Tin Containing Materials (Tinplate)

May 13, 2016

Framework

The U.S. Conflict Minerals Law (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) became effective on July 21, 2012. It defines conflict minerals as certain minerals originating from the Democratic Republic of the Congo (“DRC”) or adjoining countries. Regulations have been implemented regarding the law and companies are required to report the use of any conflict minerals originating from the DRC or adjoining countries.

Ardagh Group is not a reporting company under the scope of the Dodd-Frank Act, but we have followed the legislation as it pertains to Section 1502.

In addition, given the potential of human rights breaches, the operation of illegal mines, unacceptable working conditions resulting in fatal accidents and destruction of the environment we take measures to monitor our suppliers of tin containing materials in order to prevent sourcing from locations under any of the above conditions for our production processes. There are specific concerns about unconventional mining (working conditions, environmental destruction, social and economic conflicts) from areas in Indonesia.

Declaration

It is our policy to ensure conflict free tin sourcing under internationally agreed conditions (e.g. ILO1). Our tinplate suppliers need to demonstrate traceability and accountability of the raw materials they supply us.

In order to ensure a robust Country of Origin Inquiry (COI), we surveyed all our tinplate suppliers, based on the EICC GeSI template², for our businesses in Asia, Europe and North America with the focus on cassiterite and tin sourcing.

Based on the COI, we take Due Diligence³ to ensure that suppliers implement relevant and appropriate control mechanisms to ensure that the tinplate they supply us is sourced in conformity with applicable legislation and our internal policies.

Based on the latest survey from 2015 we have received responses from suppliers who do represent 100% of our global tinplate volume, and they all do confirm to be compliant with Section 1502 of the Dodd-Frank Act; i.e. these tinplate suppliers declared that no minerals are sourced from conflict areas of the DRC⁴ or adjacent countries and thus adhere to legal and other requirements⁵. On this basis we can declare that we take due diligence as described and that we do not knowingly source tin which contains conflict minerals, as described in the Dodd-Frank Act.

¹ International labour standards of the International Labour Organization (ILO)

² Electronics Industry Citizenship Coalition (EICC), Global e-Sustainability Initiative

³ As defined in the OECD Due Diligence Guidelines

⁴ DRC – Democratic Republic of Congo

⁵ Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act

With regards to responsible tin sourcing from Indonesia we are surveying based on the EICC template (which prevents sourcing from illegal mines) the country of origin for tin plate raw material supplied and expect our suppliers to source from CFSI⁶ audited smelters. At the time we are aware that there is tin in the supply chain sourced from Indonesia. Our due diligence process aims to identify supplies from critical smelters (if any) and to resolve potential issues with the relevant tinplate suppliers accordingly.

With our membership in the international tin industry association (ITRI)⁷ Ardagh supports the IDH Indonesian Tin Working Group⁸.

A handwritten signature in blue ink, appearing to read 'John Sadler', with a long horizontal flourish extending to the right.

John Sadler

Chief Procurement Officer
Ardagh Packaging Holdings Ltd

⁶ Conflict Free Sourcing Initiative (CFSI)

⁷ International Tin Research Institute (ITRI)

⁸ <http://www.idhsustainabletrade.com/news/a-recent-study-conducted-in-consultation-with-indonesian-stakeholders-identified-potential-for-sustainable-growth-in-the-tin-sector-in-bangka-belitung>