

UK Modern Slavery Act Statement

Introduction

This statement is made by 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 2017, pursuant to obligations under section 54(1) of the Modern Slavery Act 2015, and constitutes the Modern Slavery Act transparency statement.

The entities making this statement are part of the Ardagh Group, which is a global leader in metal and glass packaging solutions, producing packaging for most of the world's leading food, beverage and consumer care brands. With more than 100 facilities in 22 countries, employing over 23,000 people and have global sales exceeding \$8.6bn.

Respect for human rights is an integral part of our core values and business principles, as outlined in Ardagh Group's Code of Conduct, which is available for viewing on our corporate website. 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 both in our own organisation and our supply chains on an annual basis.

Our Business and Supply Chains

As a large metal and glass packaging manufacturer, Ardagh purchases a significant volume of materials & services. Key supply chains are critical to the business, and as such are carefully managed, with each having a European manager assigned to them who relate strategy to regional procurement managers for execution. Key inputs to our manufacturing process include: energy, raw materials, moulds, consumables, components packaging and logistics. These commodities have a limited number of chosen suppliers who can serve Ardagh's business. Ardagh mainly sources its goods within the EU and US.

Our 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. Ardagh Group have three fundamental documents which support this commitment: a Code of Conduct, a Responsible Procurement Policy, and a Haulier Security Booklet.

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

Ardagh Group's Responsible Procurement Policy sets out the standards we expect of our suppliers during our business relationships. In particular, the Responsible Procurement Policy outlines requirements for our suppliers regarding key social, ethical and environmental topics, inclusive of modern day slavery.

Additionally, transport Suppliers operating on supply routes into the United Kingdom are required to adhere to Ardagh Group's Haulier Security Booklet. This Booklet seeks to minimize the risks associated with migrant smuggling and human trafficking. It is provided to relevant transport Suppliers and its message is reinforced by their local procurement contact.

Our Approach

Most of our supply chains are, by design, relatively short and stable. 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

We have implemented a risk-based management system based on three key elements as follows:

1. **Desktop Risk Assessment:** Each year, Ardagh Group chooses a selection of suppliers to conduct an in-depth risk assessment on. We take into consideration multiple factors such as the industry, geography and the risk of human rights abuses (such as modern slavery) when deciding which suppliers to focus on for the year ahead. We continually

monitor media sources to ensure we do not overlook any potential risks within our supply chain.

2. **Onsite Assessments & Third-Party Audits:** Based on the outcome of the desktop risk assessment, Ardagh Group may request a supplier undergo a 4-pillar ethical audit conducted by a 3rd party, or an onsite assessment (based on the 4-pillar methodology) conducted by Ardagh Group.
3. **Contracts:** Our key supply contracts include appropriate terms to ensure that our suppliers trade ethically and take appropriate steps to ensure there is no slavery or trafficking in their business. This is ensured by including references to Ardagh Group's Code of Conduct and the Responsible Procurement Policy in key contracts, including through Ardagh Group's General Terms and Conditions of Purchase.

Responsibility and Effectiveness

We remain 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 2017.

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