

**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. 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, 2023.

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 2023, we operated 63 production facilities in 16 countries (in the Americas, Europe and Africa) and employed approximately 20,000 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 details our commitment to acting in an ethical and honest manner. Our Code of Conduct also sets out our commitment to human rights, 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 laws, either directly to management or through our Speak-Up 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.

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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.

## *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 a regular basis and it is available on the Ardagh Group website ([link](#)).

In relation to the risks associated with our business in Africa, we have a specific Supplier Code of Conduct which contains 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.

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.

## **Our approach to supply chain verification and audit** **Assessing and managing risk**

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.

### *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.

### *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 when sourcing cobalt, such as enhanced due diligence, as we are aware of the risks associated with the operation of illegal mines, unacceptable working conditions and damage to the environment.

### *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 Speak-Up 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 Sustainable Supply Chain Manager, with support from the procurement team, is responsible for monitoring adherence to our Responsible Procurement Policy.

Third parties are also able to report any concerns, including those regarding modern slavery and human rights related matters, via Ardagh's reporting mechanisms. These are detailed in our Responsible Procurement Policy and are handled in accordance with Ardagh's Ethics & Compliance - Third Party Complaints Procedure ([link](#)).

In addition to encouraging employees to raise concerns, we have also adopted an internal Procedure on Reporting Child Labour & Modern Slavery, which specifically details the signs of modern slavery and steps to take if it is discovered. Any claims are investigated by our human resources and legal teams.

## 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 and implemented similar training for our human resource team. 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 2023.

During the period covered by this statement, we have found no evidence of modern slavery either within our business or our supply chain.

## Digitally signed by:

Mike Dick

Chief Executive Officer of Ardagh Glass Packaging and Director

On behalf of Ardagh Group S.A.

10 April 2024

