ArdaghGroup

# 2023 Ardagh Group
# **Sustainability report**

## Disclosures on material topics

# Contents

# Introduction

As climate risk is ever-evolving, materiality assessments will continue to serve as a guide for Ardagh Group S.A. (Ardagh) in determining issues that are most relevant to all stakeholders. This also helps us to assess our progress toward our sustainability targets and recognise opportunities for how our sustainability strategy aligns with the goals of our peers and customers.

Our efforts to create a more sustainable business and society are driven by where we have the most opportunity for positive impact – and where we can minimise potential for negative impact.

During 2022, we (Ardagh) revisited our materiality assessment. This was to incorporate organisational changes such as the acquisition of Consol Holdings Proprietary Limited (Consol Glass), and to ensure our material topics were still relevant. A structured and comprehensive approach was applied to identify and prioritise the topics most relevant to the business and our stakeholders. The process was facilitated by external sustainability experts from RISE (Research Institutes of Sweden).

This document presents the disclosures on material topics as required by the Global Reporting Initiative's (GRI) Sustainability Reporting Standard GRI3: Material Topics 2021. It describes the process followed by Ardagh to determine its material topics (Disclosure 3-1), lists the material topics (Disclosures 3-2) and describes how Ardagh manages each of its material topics (Disclosure 3-3). Although we use the word "material" or "materiality" in this document, they should not be read as necessarily rising to the level of materiality used for the purposes of complying with U.S. federal securities laws and regulations.

# Process to determine material topics (GRI 3-1):

Ardagh Group, which includes Ardagh Metal Packaging, with the support of an external consultancy, Research Institute of Sweden (RISE), completed the following steps, as per GRI 3: Material Topics Standard, to determine its material topics:

**Step 1: Understand the organisational context**

RISE carried out desk-based research to gather contextual information about the organisation. We did this by identifying and understanding:

- the organisation's activities (focusing on Ardagh's own activities but also activities undertaken by third parties on behalf of Ardagh and activities undertaken throughout Ardagh's value chain)
- its stakeholders (with a focus on Ardagh's 6 key stakeholder groups: employees, customers, suppliers, local communities, industry associations and investors)
- its business relationships (with a focus on the relationships with suppliers and customers).
- the sustainability context in which Ardagh operates.

**Step 2: Identify the impacts and "topics"**

From this organisational context, RISE identified a list of 150+ potential impacts that the organisation and its supply chain could have on the environment, economy and people including its impacts on human rights.

RISE also identified how the organisation is impacted by the sustainability, social and economic context. By identifying both inward and outward impacts, we followed an approach to double materiality.

The impacts identified (inward/outward, potential/actual, direct/indirect) were grouped under topics. RISE used the GRI topics and added others which we thought may be relevant and important to Ardagh but were not covered directly by GRI.

Ardagh Group will be evaluating these non-GRI topics in 2023 to define its management approach and key performance indicators to measure impact of these topics.

**Steps 3 & 4: Assess the significance of the impacts and prioritise the most significant impacts and topics for reporting**

The impacts were then assessed and prioritised against their severity (which included assessing their scope, scale and remediable character), their likelihood (for potential impacts) and the degree of influence the organisation has over the impacts. Each impact was given a score based on these criteria. The topics whose impacts have the highest scores are the most material to Ardagh. From this process RISE identified topics that were clearly material, topics that were clearly not material and topics that needed further discussions.

The desk-based research undertaken in step 1 was supplemented throughout the process by interviews with key internal stakeholders. These interviews provided a deeper understanding on Ardagh's activities and provided key insights on the expectations of the organisation's key stakeholder groups and the impacts that the organisation has on these groups. The internal stakeholders and the key stakeholder groups they represent included:

- Human Resources, representing employees
- Commercial, representing customers
- Procurement and Group Sustainable Supply Chain Manager, representing suppliers
- Investors Relations, representing investors
- Group Compliance Director, representing the organisation
- Group Social Sustainability Manager, representing local communities
- Chief Sustainability Officers
- Regulatory affairs

The external stakeholders interviewed included suppliers and industry associations. The insight from this series of interviews enabled RISE to confirm the impacts identified in step 2 and to refine our assessment of these impacts in step 3.

RISE then ran a workshop with a cross functional and cross regional team of internal stakeholders to present the results of our preliminary assessment and confirm the list of material topics. This revised list was then approved by Ardagh's Chief Executive Officer for Glass and Ardagh's Chief Executive Officer for Metal.

# List of material topics (GRI 3-2):

The final list of material topics is provided in the table below. This includes GRI topics as well as additional topics which were not directly covered by GRI.

| | Economic | Environmental | Social | Human rights |
|---|---|---|---|---|
| **GRI material topics** | Economic performance<br>Anti-corruption[1]<br>Anti-competitive behaviour | Materials<br>Energy<br>Water and effluents<br>Biodiversity[1]<br>Emissions<br>Waste<br>Supplier environmental assessment | Employment<br>Occupational health and safety<br>Training and education<br>Diversity and equal opportunity<br>Supplier social assessment | Non-discrimination[1]<br>Freedom of association and collective bargaining<br>Child labour[1]<br>Forced or compulsory labour[1]<br>Rights of indigenous peoples[1] |
| **Additional material topics** | | | Talent acquisition and retention<br>Customer focussed<br>Industry associations engagement and partnerships<br>Social outreach programme | |

An ever-increasing focus on all aspects of sustainability within the business has resulted in far more topics being identified as material to Ardagh. In particular, the following additional topics have been identified as material in connection with this materiality assessment and are now included in this document that follows GRI Sustainability Reporting Standards:

- Topics relating to anti-corruption and anti-competitive behaviour – these topics were already addressed in Ardagh's Code of Conduct and other policies.
- Topics relating to diversity and equal opportunity, non-discrimination, child labour, forced and compulsory labour, and rights of indigenous peoples – these topics were already addressed in Ardagh's Code of Conduct and other policies.
- Biodiversity – While Ardagh believes it has limited or no direct impacts on biodiversity, the increased scientific, political and regulatory focus on biodiversity has led to this becoming a material topic in 2022.

# Management of material topics (GRI 3-3)

Unless specified, the scope of the material topics disclosures in this document covers all Ardagh's activities and locations. This document is a supplement to Ardagh's 2023 Sustainability Report, together these documents address all topics material to Ardagh's operations.

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1   *Additional GRI Topics identified as material in 2022*

# General disclosures:

## GRI 2-7a. Employees

| Headcount of Ardagh as of 31 December 2022 | | | | |
|---|---|---|---|---|
| **Region** | **Male** | **Female** | **Not declared** | **Total** |
| AGP-E (incl. 1 head count 'Ardagh') | 5575 | 776 | 1 | 6352 |
| AMP-E (incl AMP-IE) | 2980 | 438 | 2 | 3420 |
| AGP-NA | 4151 | 1099 | 15 | 5265 |
| AMP-NA | 1681 | 225 | 7 | 1913 |
| AGP-A | 2136 | 428 | | 2564 |
| AMP-SA (incl AGP-SA) | 756 | 236 | | 992 |
| | | | | **20506** |
| **Note: Headcount declared for GR405-1 is 20524. The difference in the two numbers is due to Board members who are not employees being included in the 20524.** | | | | |

# Economic Topics

## GRI 201: Economic Performance

**Relevance**: Economic performance is critical to Ardagh's business success and is required by all its stakeholders.

Ardagh's economic performance has a direct impact on its employees. By performing well, the organisation can secure its staff, invest in existing and new operation sites, grow and subsequently recruit more people. Shareholders are also directly impacted by Ardagh's economic performance. Good economic performance and management means that Ardagh is well positioned to supply its customers and in turn can continue procuring high volumes of raw materials from its suppliers. Being financially secured, Ardagh generates tax revenue for local and national government agencies and can support local communities and invest significant funds to promote and develop STEM education. The organisation can also comfortably spend resources working with industry associations on projects that may benefit the whole metal and glass industry.

A good economic performance puts Ardagh in a good position to improve its performance environmentally and socially. A good liquidity, balance sheet and cash flow mean that Ardagh can invest significantly in new technologies that will reduce its scopes 1 and 2 greenhouse gas emissions and help mitigate climate change.

**Management of material topics (GRI 3-3)**: Ardagh tracks its economic performance on a continuous basis and reports in its quarterly and annual reports. Ardagh complies with all legal requirements regarding preparation and publishing of audited accounts.

Financial reports

**GRI 201-1**

| | 2021 | | 2022 | |
|---|---|---|---|---|
| | **STEM** | **Charity & CSI[2]** | **STEM 2022** | **Charity & CSI[2]** |
| AMP - EU | n/a | $49,536 | | $414,660 |
| AMP - NA | $992,500 | $404,210 | $1,292,500 | $1,271,799 |
| AMP - SA | n/a | $77,982 | n/a | $93,854 |
| AGP - EU | n/a | $461,487 | | $1,078,721 |
| AMP & AGP - Europe | | | $365,000 | |
| AGP-A CSI[2] | n/a | n/a | n/a | $273,228 |
| AGP - NA | $1,417,500 | $326,005 | $1,035,000 | $167,975 |
| Group | | $387,487 | n/a | $637,816 |
| **Total** | **$2,410,000** | **$1,319,220** | **$2,692,500** | **$3,938,053** |
| **Charity Total** | | | | **$5,257,273** |
| **CSI contributions 2022[2]** | | | | **$273,228** |
| **STEM Total** | | | | **$5,102,500** |
| **Grand Total** | | | | **$10,633,001** |

**GRI 201-1, 201-2, 201-3 and 201-4**

Further responses are also included directly in our [GRI Index](#)

## GRI 205: Anti-corruption

**Relevance**: Ardagh is committed to complying with all applicable laws and to always operating in an ethical and honest way. Ardagh does not tolerate any incidents of fraud or corruption. Any such instances would bring reputational risk to the business and may result in legal actions and/or fines.

**Management of material topics (GRI 3-3)**: All businesses have the responsibility to work in an ethical way. [Ardagh's Code of Conduct](#) details what this means for Ardagh, its employees and other stakeholders it deals with. All Ardagh's employees are responsible for reading and following Ardagh's Code of Conduct which includes a series of policies that employees must comply with (e.g., Anti-Fraud Policy, Anti-Bribery Policy, Gift and Hospitality Policy, Conflict of Interest Policy). Employees must comply with this Code of Conduct and have the possibility to raise concerns or report violations of the code confidentially and anonymously through Ardagh's Compliance Hotline.

Ardagh is also a signatory of the United Nations Global Compact (UNGC) and is committed to work in alignment with the UNGC's 10 principles, including principle 10 that states that businesses should work against corruption in all its forms.

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2   CSI =Corporate Social Investment, specific to our AGP-A operations

From an anti-corruption perspective, we could also note that anti-corruption matters are considered by the Audit Committee of Ardagh Group S.A. and Ardagh Metal Packaging SA, who have both established Compliance Committees to retain oversight and ensure implementation of appropriate policies and controls in this area.

United Nations Global Compact

Audit Committee Charter

### GRI 205-1 Operations assessed for risks related to corruption

**a.** Total number and percentage of operations assessed for risks related to corruption.

Ardagh has undertaken a groupwide anti-bribery and risk assessment which included reviewing potential risks within each operating business. This was initially completed, following detailed discussions with stakeholders across all businesses and functions, in 2019 and has been kept under review. Most recently in September 2022 the risk assessment was fully reviewed on the basis of input from various functions (including HR, Sales and Operations) that were obtained by questionnaires. The risk assessment covers various topics, including risks of bribery and corruption in sales and procurement processes.

Following the acquisition of Ardagh Glass Packaging-Africa (AGP-A) and given the higher risk profile of businesses operating in Africa, a full anti-bribery and corruption risk assessment was completed in 2022.

**b.** Significant risks related to corruption identified through the risk assessment.

Potential risks related to corruption that Ardagh has identified are those associated with the use of agents, including customs agents. However, given the controls we have in place, we do not consider having any significant risks related to corruption.

### GRI 205-2 Communication and training about anti-corruption policies and procedures

Ardagh's anti-bribery policy is included within its **Code of Conduct**, which is communicated to all employees, both on joining and on an on-going basis.

**a.** Total number and percentage of governance body members that the organisation's anticorruption policies and procedures have been communicated to, broken down by region.

100% of the members of the Ardagh Group S.A. board of directors have received communications regarding anti-corruption policies and procedures. All those individuals have completed an annual certification of Ardagh's Code of Conduct, which included an element of training on anti-bribery and corruption within a quiz.

**b.** Total number and percentage of employees that the organisation's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.

Ardagh's Anti-Bribery Policy has been communicated to 100% of its employees, as it is included in Ardagh's Code of Conduct. Communications have included messages via the Ardagh intranet (myArdagh). In 2021-2022, 852 employees in higher exposure roles completed enhanced Anti –Bribery and Corruption training.

**c.** Total number and percentage of business partners that the organisation's anticorruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organisation's anti-corruption policies and procedures have been communicated to any other persons or organisations.

Ardagh requires its business partners to comply with its Responsible Procurement Policy, which references Ardagh's Code of Conduct including its Anti-Bribery Policy. All agents are required to

comply with the principles set out in Ardagh's Anti-Bribery Policy and agents are required to provide annual certifications confirming compliance (subject to a limited number of low-risk agents who are exempt). Ardagh does not currently collate this data broken down by type and region.

**d.** Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.

Ardagh does not currently collate this data broken down by region.

**e.** Total number and percentage of employees that have received training on anticorruption, broken down by employee category and region.

Training on anticorruption is available on the myLearning platform. However, Ardagh does not currently collate the number and percentage of employees that have taken this training module, broken down by employee category and region.

### GRI 205-3 Confirmed incidents of corruption and actions taken

**a.** Total number and nature of confirmed incidents of corruption.

None.

**b.** Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.

None.

**c.** Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.

None.

**d.** Public legal cases regarding corruption brought against the organisation or its employees during the reporting period and the outcomes of such cases.

None.

## GRI 206: Anti-competitive behaviour

**Relevance**: Ardagh is committed to do business in the right way and is committed to not behave in any way which could be seen as anti-competitive. Any such instances would bring reputational risk to the business and may result in legal actions and/or fines.

**Management of material topics (GRI 3.3)**: Ardagh is committed to conducting its activities with commercial integrity. Ardagh complies with applicable rules and regulations including competition and anti-bribery laws.

Ardagh's commitment to preventing anti-competitive behaviour (as well as ensuring commercial integrity) is set out in Ardagh's Code of Conduct. In addition, Ardagh has reiterated this commitment in its internal Competition Compliance Policy, which also sets out behaviours expected of its employees. The Policy makes it clear that Ardagh will not tolerate breaches of competition laws, and that a failure to follow the policy may result in appropriate disciplinary actions (up to and including termination of employment).  Ardagh ensures that all relevant employees receive training on competition compliance.  Where Ardagh identifies any cases involving potentially anti-competitive conduct, it undertakes a robust investigation including data collection, review and analysis.

Training related to anti-competitive behaviour is released every 18 months, via myLearning to relevant colleagues, including those in the sales and procurement teams.  We monitor participation and completion via the myLearning system.

The training includes a quiz, which participants are required to pass before the training is completed.

In addition, Ardagh only participates in cross-industry forums (industry and trade association working groups, etc) where a compliance statement is issued at the beginning of the meeting and ideally with a compliance expert participating in the meeting.

**GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices**

**a.** Number of legal actions pending or completed during the reporting period regarding anti-competitive behaviour and violations of anti-trust and monopoly legislation in which the organisation has been identified as a participant.

**b.** Main outcomes of completed legal actions, including any decisions or judgements.

Ardagh has received allegations relating to anti-competitive conduct, which it received as a result of parental liability for the alleged anti-competitive conduct of entities it controlled at the time. Ardagh strongly disagrees with the allegations and is vigorously contesting them.

Code of Conduct

# Environmental Topics

## GRI 301: Materials

**Relevance**: As a manufacturer of metal and glass packaging containers, Ardagh uses significant volumes of raw materials such aluminium coils and sheets, silica sand, soda ash, limestone, cullet, and coatings.

**Management of material topics (GRI 3-3)**: The extraction of raw materials required for the manufacturing of Ardagh's packaging containers could potentially contribute to natural resources depletion and may cause environmental impacts.

For glass, risks of resources scarcity and environmental impacts are low. The sector does not anticipate any risk of raw material shortage in the near and long term. AGP owns some sand mines and, in compliance with legal requirements, for each mine has followed a very strict and rigorous process to assess and manage potential environmental impacts, both negative and positive of extracting sand. The business also has a good visibility on the activities of its upstream value chain, and this ensures that its suppliers also comply with these strict requirements when extracting raw materials.

For aluminium, the upstream value chain is more complex. AMP works with its direct suppliers and has a formal process to assess them from an environmental point of view. AMP, however, does not deal with the bauxite extractive industry directly, which makes the assessment of environmental impacts of suppliers of bauxite more difficult.

AGP and AMP always seek ways to limit their dependence on raw materials and reduce and mitigate the environmental impacts of producing glass and aluminium through the following actions:

- Assessing their direct suppliers and working with them to reduce their environmental impacts;
- Within the constraints of customer design requirements, optimising the weight of aluminium and glass containers without impacting product quality and safety;
- Procuring and using as much recycled material as feasible;
- Supporting campaigns to encourage consumers to recycle their packaging after use. In some cases, this includes investing in new collection, sorting and reprocessing capacity.

**Note:**

The scope for this disclosure covers materials consumed at manufacturing sites.

Materials consumed at non-manufacturing sites (e.g. sales offices) are not included as they are negligeable.

**GRI 301-1, 301-2, 301-3**

Direct response in our cluded in our [GRI Index](GRI Index)

## GRI 302: Energy

**Relevance**: Energy consumption is a major cost driver for the business and is also directly linked to the Ardagh's environmental footprint and contribution to climate change. The manufacturing of glass packaging is an energy intensive process which requires large quantities of both electricity and heat. The manufacturing of aluminium packaging is a much less energy intensive process in comparison to glass; however, the extraction of bauxite and the smelting to produce aluminium coils and sheets requires large quantities of energy.

**Management of material topics (GRI 3-3)**: Ardagh is committed to both reduce its energy consumption and to switch to more sustainable sources of energy for its own operations (scopes

1 and 2). Ardagh aims to source 100% of its electricity demand from renewable sources by 2030. Ardagh is also working on reducing the energy consumption throughout its value chain (scope 3), through working with its suppliers and logistic partners, reducing its consumption of raw materials and sourcing cullet and recycled aluminium (which requires less energy during the manufacturing of packaging containers).

As an energy intensive business, we strive to continuously improve our energy baseline. To realise this and be compliant with local requirements especially those from various regional emission trading schemes we have implemented ISO 50001 management systems fully across Europe. In other regions we have received various certification for our energy management e.g. the "Energy Star" in the US. In 2021, we reported 52% of our global operations had implemented a certified energy management system (50% of AMP's global operations).

A small quantity of electricity is generated through solar panels at operating facilities, but this accounts for <0.1% of total electricity needs and is therefore not reported in the table below.

Detailed Energy Disclosures:

### GRI 302-1 a-e– Energy Consumption within the organisation

Self-generated renewable electricity (e.g. from solar panels) currently constitutes less than 0.1% of electricity requirements and is therefore not included in the tables below.

| AMP Energy Consumption (GRI 302-1a, 302-1b, 302-1c and 302-1e) | | | |
|---|---|---|---|
| | **2020** | **2021** | **2022** |
| Sum of Total Electricity (MWh) (renewable and non-renewable) | 764,086 | 830,768 | 888,916 |
| Total Renewable Electricity (MWh) | 167,692 | 140,500 | 187,437 |
| Total Non-Renewable Electricity (MWh) | 596,394 | 690,269 | 701,479 |
| Sum of Hot Water (MWh) (non-renewable) | 1,802 | 2,386 | 2,520 |
| Sum of Total Fossil Fuels (MWh) (non-renewable) | 672,401 | 731,625 | 772,018 |
| Sum of Total Energy (MWh) (renewable and non-renewable) | 1,438,289 | 1,564,780 | 1,663,454 |
| Sum of Natural Gas (MWh) (non-renewable) | 667,762 | 726,814 | 767,004 |
| Sum of Heavy Fuel Oil (MWh) (non-renewable) | - | - | - |
| Sum of Diesel Oil (MWh) (non-renewable) | 456 | 553 | 631 |
| Sum of LPG (MWh) (non-renewable) | 4,183 | 4,258 | 4,383 |

| AMP Energy consumption by type (GRI 302-1a and 302-1b) | 2020 | 2021 | 2022 |
|---|---|---|---|
| Total Renewable Energy (MWh)[3] | 167,692 | 140,500 | 187,437 |
| Total Non-Renewable Energy (MWh)[4] | 1,270,597 | 1,424,280 | 1,476,018 |

| AGP Energy Consumption (GRI 302-1a, 302-1b, 302-1c and 302-1e) | 2020 | 2021 | 2022 |
|---|---|---|---|
| Sum of Total Electricity (MWh) (renewable and non-renewable) | 2,806,420 | 2,926,110 | 2,947,704 |
| Total Renewable Electricity (MWh) | 375,604 | 460,338 | 465,792 |
| Total Non-Renewable Electricity (MWh) | 2,430,816 | 2,465,772 | 2,481,912 |
| Sum of Total Fossil Fuels (MWh) (non-renewable) | 10,738,232 | 10,884,994 | 10,970,191 |
| Sum of Total Energy (MWh) (renewable and non-renewable) | 13,544,652 | 13,811,104 | 13,917,895 |
| Sum of Natural Gas (MWh) (non-renewable) | 10,024,390 | 10,158,537 | 10,151,709 |
| Sum of Heavy Fuel Oil (MWh) (non-renewable) | 570,551 | 557,225 | 643,817 |
| Sum of Diesel Oil (MWh) (non-renewable) | 46,963 | 74,116 | 68,280 |
| Sum of LPG (MWh) (non-renewable) | 96,328 | 95,116 | 106,386 |

| AGP energy consumption by type (GRI 302-1a and 302-1b) | 2020 | 2021 | 2022 |
|---|---|---|---|
| Total Renewable Energy (MWh)[3] | 375,604 | 460,338 | 465,792 |
| Total Non-Renewable Energy[5] (MWh) | 13,169,048 | 13,350,766 | 13,452,103 |

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3   Includes electricity from renewable sources (e.g., unbundled renewable energy credits, green tariffs, etc.)

4   Includes electricity from non-renewable electricity, (e.g., coal fired power generation) heating (hot water) and fossil fuels

5   3Includes non-renewable electricity and fossil fuels

**GRI 302-1d**

Not applicable

**GRI 302-1-f/g – Standards, methodologies, assumptions, and/or calculation tools used / Source of the conversion factors used:**

Activity data is collected from various sources on the plant level (e.g., invoices and meters) and then further converted into MWh if necessary. In terms of conversions factors, only the net calorific value (also known as default or lower calorific value) is used for the conversion to MWh. Net calorific value is requested from fuel/energy suppliers for each fuel/energy type consumed. If this information is not available, the conversion factor values are sourced from 2006 Intergovernmental Panel Climate Change Guidelines for National Greenhouse Gas Inventories document. Converted fuel and energy consumption data is then submitted/verified in the central reporting application. At this point, consumption data at the plant level is further consolidated and checked for quality/consistency to meet various reporting requirements. This process is subject to continuous improvement, as we aim to further streamline and standardise it across all the regions.

**GRI 302-3 Energy intensity**

**b.** AMP kWh/ 1000 units & AGP- MWh/ per tonnes packed

**c.** includes Electricity and fossil fuels for the manufacture of containers

d. we don't consider consumption outside the organisation material

**Note:**

The scope for this disclosure covers energy consumed at production facilities.

Energy consumed at non- production facilities (e.g., sales offices) is not included as it is negligeable.

**GRI 302-2; 302-4; 302-5**

Direct response in our cluded in our [GRI Index](GRI Index)

## GRI 303: Water and Effluents

**Relevance**: Ardagh uses water for cleaning (both AGP and AMP) and cooling (AGP). The water used can be treated or reused. Although the production of glass and metal containers are not water-intensive processes, Ardagh is committed to continuously reducing the amount it uses and contributing to saving natural resources. Also, many of Ardagh's food processing customers use large quantities of water. Given the importance of this resource for Ardagh's customers and the fact that water is a potentially scarce resource in some locations, Ardagh considers water as being a material topic to the organisation.

**Management of material topics (GRI 3-3)**: Both AMP and AGP monitor the amount and sources of water used. AMP set a water usage target of 20% intensity reduction by 2030 and AGP set a water usage target of 26% intensity reduction by 2030. To achieve this, AMP and AGP undertake significant investments in water reduction projects across their production facilities.

Our water withdrawal and discharge are validated through an external third-party verification process. By employing robust assessment methods, improvement opportunities are identified, and subsequent conservation measures are implemented.

Water is sourced from a combination of groundwater, surfaces and third parties, depending on the production facility location. AMP uses municipal water and ground water. AGP uses municipal water, ground water and surface water. Once utilised, water can be sent through an on-site

wastewater treatment system prior to its discharge. Most water is then discharged into third-party municipal wastewater treatment systems for further treatment. Facilities that treat wastewater onsite monitor parameters such as biological oxygen demand (BOD) and chemical oxygen demand (COD), parameters at a minimum, with additional parameters as required by local discharge and/or operational permits. All discharges follow local regulations.

At a local level, water-related impacts are identified annually by evaluating the specific data at each location and developing an action plan to address identified risks and opportunities. Assessments include measuring and analysing incoming and outgoing water as well as overall resource utilisation.

Ardagh regularly produces an WWF vs Aquaduct comparison report for all our production sites to monitor any locations in areas of high-water stress.

| Number of production facilities in high-water stress areas as identified using the World Resource Institute's Aquaduct tool | | | |
|---|---|---|---|
| | **2020** | **2021** | **2022** |
| AGP | 13 | 13 | 13 |
| AMP | 4 | 4 | 4 |

**Total water withdrawal & consumption from all areas with water stress in cubic meters**

| AMP - Totals associated with locations in high-water stress areas as identified using the World Resource Institute's Aquaduct tool | | | |
|---|---|---|---|
| | **2020** | **2021** | **2022** |
| Total Sum of Municipal water supply (m$^3$) | 278,066 | 337,231 | 371,388 |
| Total Sum of Groundwater (m$^3$) | 226,819 | 204,224 | 191,520 |
| Total Sum of Total Water withdrawal (m$^3$) | 504,885 | 541,455 | 562,908 |
| Total Sum of Wastewater discharge (m$^3$) | 406,975 | 453,959 | 481,567 |
| Total Water Consumption (m$^3$) | 97,910 | 87,496 | 81,341 |

| AGP - Totals associated with locations in high-water stress areas as identified using the World Resource Institute's Aquaduct tool | | | |
|---|---|---|---|
| | **2020** | **2021** | **2022** |
| Total Sum of Municipal water supply (m$^3$) | 668,494 | 624,033 | 656,205 |
| Total Sum of Surface water (m$^3$) | N/A | 13,743 | 9,789 |
| Total Sum of Groundwater (m$^3$) | 383,732 | 407,915 | 458,590 |
| Total Sum of Total Water Withdrawal (m$^3$) | 1,052,226 | 1,045,691 | 1,124,584 |
| Total Sum of Wastewater discharge (m$^3$) | 275,832* | 250,273* | 610,998 |
| Total Water Consumption (m$^3$) | 776,394* | 795,418* | 513,586 |

Water discharge quantities were under-reported for 2020 and 2021 due to data unavailability for two of the newly acquired Consol Glass production facilities. Subsequently, water consumption for 2020 and 2021 is over estimated.

**Note:**

The scope for this disclosure covers water withdrawn, consumed, and discharged at manufacturing sites.

Water consumed at non- production facilities (e.g. sales offices) is not included as it is negligeable.

**GRI 303-3; 303-4, 303-5**

Direct response in our cluded in our [GRI Index](#)

## GRI 304: Biodiversity

**Relevance**: To Ardagh's knowledge, none of its production facilities are located in or near protected areas and Ardagh's own activities do not significantly affect biodiversity. Nevertheless, Ardagh believes that every organisation should do their part to preserve, protect and restore biodiversity and is therefore in the process of collecting data and assessing its potential impacts on biodiversity, to be in a position to report on this topic in subsequent reporting periods.

**Management of material topics (GRI 3-3)**: The activities at Ardagh's offices and production facilities do not significantly affect biodiversity. Nonetheless, at some production facilities local initiatives have been undertaken to enhance biodiversity (e.g., pond restoration work). Ardagh owns some sand mines and, in line with legal requirements, each has followed a very strict and rigorous process to assess and manage potential negative and positive environmental impacts of extracting sand, including assessing and confirming that endangered species and biodiversity as a whole are not affected. This assessment is required to obtain permit to mine sand. Following the obtainment of the permit, regular controls are undertaken to assess potential adverse impacts on biodiversity and other environmental (and social) topics.

**GRI 304-1, 304-2, 304-3 and 304-4**

Direct response in our cluded in our [GRI Index](#)

## GRI 305: Emissions

**Relevance**: The manufacturing of glass and metal packaging generates greenhouse gas emissions and other air emissions such as nitrogen oxides (NOx) (from fuel combustion at the sites) and volatile organic compound (VOC) (from the application of coatings and varnishes at metal container production facilities only).

**Management of material topics (GRI 3-3)**: Ardagh set science-based targets (SBT) to reduce absolute scope 1 and 2 GHG emissions by 42% by 2030 and to reduce absolute scope 3 GHG emissions by 12.3% by 2030 from a 2020 base year.

Ardagh aims to achieve its SBT by transitioning to 100% renewable electricity by 2030, by implementing energy efficient projects, increasing recycled content, partnering on low carbon transport and implementing other initiatives.

NOx emissions are only relevant to the glass production facilities. Emissions values are based on stack emission measurements. Measurements regimes differ depending on the production facilities, including both continuous and automated sampling.

AMP has set a target of 10% VOC emission intensity reduction by 2030 and AGP has set a target of 23% NOx emission intensity reduction by 2030. VOC emissions are calculated based on inputs using supplier provided information and efficiency ratings of on-site destruction technology (e.g., regenerative thermal oxidisers), as applicable.

Emissions of SOx and particulates will also occur, but there are currently no company-wider targets for these emissions within Ardagh and therefore data is not published. As the production of glass containers and metal containers also does not give rise to significant quantities of Persistent Organic Pollutants (POP) or other Hazardous air pollutants (HAP) they do not require monitoring as part of the sites' operating permits, and therefore data for these emissions is not collected and reported

**GRI 305-2 a. Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of $CO_2$ equivalent.**

This is published in our [CDP report](#) & [AMP](#)

| AMP Intensity | 2020 | 2021 | 2022 |
|---|---|---|---|
| Sum of Scope 1 kg $CO_2$/1000 pcs[6]1 | 3.57 | 3.65 | 3.62 |
| Sum of Scope 2 kg $CO_2$/1000 pcs[1] | 4.82 | 4.31 | 4.20 |

| AGP Intensity | 2020 | 2021 | 2022 |
|---|---|---|---|
| Sum of Scope 1 t $CO_2$/tpacked | 0.440 | 0.425 | 0.427 |
| Sum of Scope 2 t $CO_2$/tpacked | 0.206 | 0.185 | 0.188 |

**Note**:

The scope for this disclosure covers emissions generated at production facilities.

Emissions generated at non- production facilities (e.g., sales offices) are not included as they are negligeable.

Scope 1 – Direct emissions such as those from production and transport on site | Scope 2 – Indirect emissions from electricity use | Scope 3 – Upstream emissions such as those from raw material sourcing, transport and waste|; Total results considering supplier PCFs for purchased goods (cut-off criteria for recycled material

**GRI 305-1, 305-2, 305-3, 305-4, 305-5, 305-6 and 305-7**

Direct response in our cluded in our [GRI Index](#)

## GRI 306: Waste

**Relevance**: The manufacturing of glass and aluminium packaging generates some hazardous and non-hazardous waste. For non-hazardous waste, the vast majority is process waste. Internal cullet from glass manufacturing is reused within the process. Aluminium waste (e.g., rejected product, shape waste from closure production, trim, etc) is returned to our suppliers for recycling.

Hazardous wastes are non-operational and generated intermittently, mostly during the refurbishment of furnaces. Every Ardagh facility carefully tracks and reports the amount of operational waste it generates and how it Is managed.

This database is constantly reviewed and assessed for accuracy. Since requirements for disposal vary from country to country, waste reporting is complete at the local manufacturing facility level, and

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6   Intensity metrics shown here include can body production facilities only. Our facility in Huron, Ohio commenced ends production in November 2021 and can body production in July 2022. As can body production at the Huron, Ohio production facility was only in operation for part of 2022, performance data from the Huron, Ohio production facility has been omitted from these metrics. We plan to include performance data from the Huron, Ohio production facility in future reports.

documentation is supplied by the waste contractor or the facility itself. Due to these global differences, we continue to work with our waste management suppliers to improve the collection of data.

All waste is managed off-site, by third parties. To ensure that these third parties manage the waste in line with contractual and legislative obligations only licenced waste management operators are used

**Management of material topics (GRI 3-3)**: AMP set a target of zero waste to landfill1 by 2025 and AGP set a target of zero waste to landfill[7] by 2030. AGP-A is excluded from the current sustainability reporting cycle as it did not compile this data. They are currently being integrated into Ardagh data management systems and data will become available for the next full Sustainability reporting cycle.

### GRI 306-3 & 306-4 & 306 -5

| AMP- Absolute operational waste | 2020 | 2021 | 2022 |
|---|---|---|---|
| Sum of Total Waste[8] (t) | 19,037 | 25,337 | 22,375 |
| Sum of Total Wate disposed[9] (t) | 4,623 | 6,823 | 4,428 |
| Sum of Total Waste recovered[10] (t) | 14,414 | 18,514 | 17,947 |
| Sum of Total Waste recovery % | 76% | 73% | 80% |
| Sum of Waste landfilled (operational)[11] (t) | | | 2,904 |
| Sum of Waste landfilled[12] % | - | - | 13% |
| Sum of Total hazardous waste[13] (t) | 5,634 | 8,492 | 7,276 |
| Sum of Total non-hazardous waste[14] (t) | 13,403 | 16,845 | 12,194 |
| Sum of Sum of all hazardous wastes disposed (t) | 1,629 | 1,368 | 1,267 |
| Sum of Sum of all hazardous wastes recycled (t) | 4,005 | 7,124 | 6,009 |
| Sum of Sum of all non-hazardous wastes disposed (t) | 2,994 | 5,456 | 257 |
| Sum of Sum of all non-hazardous wastes recycled (t) | 10,409 | 11,389 | 11,938 |

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7   Zero waste to landfill for operational waste streams where allowed by regulation

8   Total waste generated is equal to total waste disposed and total waste recovered.

9   Total waste disposed includes hazardous and non-hazardous waste chemically or physically treated, incinerated without energy recovery as well as waste landfilled.

10   Waste recovered includes hazardous and non-hazardous waste reused or recycled, incinerated with energy recovery as well as waste blended into fuel.

11   Only available as total operational waste landfilled (no breakdown by hazardous and non-hazardous waste currently available). Since the metric was introduced in 2022, no numerical data was available for the years prior to it.

12   Zero Waste to Landfill criteria: 95% waste diversion rate or up to 5% max of total operational waste allowed for landfilling.

13   Excluding hazardous waste landfilled as 'waste landfilled' is a new metric introduced in 2022 and breakdown by hazard classification is not available

14   Excluding non-hazardous waste landfilled 'waste landfilled' is a new metric introduced in 2022 and breakdown by hazard classification is not available

| AGP -Absolute - Operational Waste | 2020 | 2021 | 2022 |
|---|---|---|---|
| Sum of Total Waste[8] (t) | 75,487 | 81,959 | 73,805 |
| Sum of Sum of Total Waste Disposed[9] (t) | 37,769 | 38,546 | 42,474 |
| Sum of Sum of Total Waste Recovered[10] (t) | 37,717 | 43,413 | 31,332 |
| Sum of Sum of Total Waste Recovery % | 50% | 53% | 43% |
| Sum of Waste landfilled (operational)[11] (t) | 0 | 0 | 18,061 |
| Sum of Waste landfilled[12] % | 0 | 0 | 25% |
| Sum of Total hazardous waste[13] (t) | 21747 | 20118 | 24027 |
| Sum of Total non-hazardous waste[14] (t) | 53739 | 61841 | 31717 |
| Sum of Sum of all hazardous wastes disposed (t) | 18,522 | 17,411 | 18,954 |
| Sum of Sum of all hazardous wastes recycled (t) | 3,225 | 2,707 | 5,073 |
| Sum of Sum of all non-hazardous wastes disposed (t) | 19,247 | 21,135 | 5,459 |
| Sum of Sum of all non-hazardous wastes recycled (t) | 34,492 | 40,706 | 26,258 |

**Notes**

1. The scope for this disclosure covers operational waste generated at production sites and excludes non-operational waste.
2. Waste generated at non-production sites (e.g. sales offices) is not included as it is negligeable.
3. Waste generated upstream or downstream in the value chain is not quantified or reported.
4. Segregation of operational and non-operational waste streams as well as "waste landfilled" metrics were introduced in 2022. This affects trends for certain KPIs compared to previous years.
5. Total waste generated, excluding waste landfilled, is available by hazard classification (i.e., hazardous and non-hazardous waste). Waste landfilled by hazard classification is not available. There are plans to include this in future reports
6. In compliance with the relevant regulation, selected operations for landfilling include: landfilling on dump sites, landfilling on sanitary landfills as well as permanent storage of waste in mines.
7. In addition to diverting wastes that are managed offsite from disposal through recycling and energy recovery, a proportion of the cullet used as a raw material in Ardagh's glass furnaces is internal cullet. Internal cullet is glass which is circling within the factory without crossing its perimeter (typically rejects not meeting the quality requirements). By remelting this material and incorporating it into the production process Ardagh is effectively diverting the material from disposal.

We are currently updating our data management and tracking processes-to further align with updated legislations regarding waste categorisation and management. Our future systems will include further granularity on waste data and we will be refining our approach to waste treatment operations as a direct result of this information.

**GRI 306-2 a & b**

Our procurement team is currently working on more robust processes to assess suppliers with regard to this topic. Currently production facilities assess each new third-party waste management entity to ensure they abide by all currently local regulatory requirements in addition to aligning with Ardagh environmental standards and policies.

## GRI 308: Supplier Environmental Assessment

**Relevance**: Ardagh is committed to use raw materials that are sustainably and ethically sourced. Ardagh is working with its suppliers to ensure the extraction and production of raw materials do not have negative environmental impacts. Moreover, AMP's scope 3 emissions account for 89% of AMP's total emissions while AGP's scope 3 emissions represent 36% of AGP's total emissions and both metal and glass businesses have set a target to reduce absolute scope 3 GHG emissions by 12.3% by 2030 from a 2020 base year.

**Management of material topics (GRI 3-3)**: All Ardagh's suppliers must comply with the organisation's Responsible Procurement Policy that outlines requirements for Ardagh's suppliers regarding key social, ethical and environmental topics. For example, suppliers are required to have waste management processes in place, to move away from non-renewable energy sources when feasible and to conduct a suitable supply chain risk assessment to ensure they manage their supply chain responsibly. Suppliers must adhere to all relevant environmental laws and regulations.

To ensure compliance with the Responsible Procurement Policy Ardagh has implemented a supplier assessment process, where every year Ardagh selects some of its suppliers, send a questionnaire and conduct an in-depth risk assessment on each selected supplier. Depending on the outcome of the risk assessment, Ardagh may request an onsite sustainability assessment. This annual assessment is detailed in Ardagh's Responsible Procurement Policy. This assessment ensures that if negative environmental impacts are identified, actions are taken to remediate them.

We define the basic principles in our Responsible Procurement Policy to ensure that all suppliers are engaged in our GHG emission reduction efforts. However, it is not feasible to assess all suppliers due to the complexity of data gathering among all supply chains. Therefore, these suppliers were selected based on strategic importance and our critical category. In 2022, 100% of critical category suppliers have completed the survey, which accounts for 51% of procurement spend in our AGP business and 78% of our procurement spend in our AMP business.

**Note**:

The scope for this disclosure covers suppliers of raw materials for manufacturing.

Suppliers of consumables at non- production facilities (e.g. sales offices) are not covered as the volume procured from these suppliers is negligeable.

Responsible Procurement Policy

**GRI 308-1 and 308-2**

Direct response in our  our GRI Index

# Social Topics

## GRI 401: Employment

**Relevance**: Ardagh Group is a large employer, with over 20,000 employees in several regions (Europe, North and South America and Africa).

**Management of material topics (GRI 3-3)**: As a large organisation, Ardagh provides employment and therefore a regular income to over 20,000 people across multiple regions. Being a manufacturer, most employment opportunities at Ardagh are in its production facilities, where it is challenging to attract and retain employees. Ardagh is continuously looking at how to make workplace conditions and benefits attractive.

The HR function at Ardagh made employee experience a key focus in 2022.  We recognise that listening to our employee's feedback, needs and wants will help us ensure that we are building and maintaining a company and culture that both attracts, but even more importantly, retains brilliant people.  In partnership with Culture Amp, a market-leading employee experience platform used by more than 5,000 companies in 163 countries, we launched our first global employee engagement survey, achieving a 41% participation rate.

Over the summer of 2022, action plans were developed at business unit, plant and function level, responding to feedback provided and addressing areas for improvement.

**GRI 401-1a and b** New employee hires and employee turnover

**GRI 401-2** Benefits provided to full-time employees that are not provided to temporary or part-time employees

## GRI 403: Occupational Health and Safety

**Relevance**: The health and safety of our employees, contractors and any other stakeholders we work with is paramount to Ardagh.

**Management of material topics (GRI 3-3)**: Ardagh is committed to comply with health and safety laws and to maintain a safe and healthy workplace for all its employees. This is achieved through the establishment of a safety management framework and process, which has been branded BSafe!

Details regarding BSafe! can be found in **Ardagh's Health and Safety policy**

**GRI 403-1 to 403-10:**

Direct response in our **GRI Index**

## GRI 404: Training and Education

**Relevance**: Training and education ensure that Ardagh's employees have the right skills to perform at their best in their role and can continue to learn, develop and grow throughout their career with Ardagh.

**Management of material topics (GRI 3-3)**: In 2019, Ardagh launched myLearning, a digital learning platform, accessible to all employees regardless of their functions and locations. The platform offers learning and development opportunities, ranging from technical training to strategic leadership management, and is continuously expanded with new content to support the on-going development needs of our people.

In 2022, we significantly expanded the range of training courses available to employees via the online 'Business Essentials' library. Business Essentials is a series of more than 2,500 learning modules in various formats, lengths, languages (nine) and levels to provide critical business and people skills.

Ardagh is looking at developing relevant KPIs to ensure that all employees are given the same development opportunities and are attending or taking relevant trainings that would benefit their careers.

### GRI 404-1 Average hours of training per year per employee

We have invested in a new training platform and most countries were able to report an average number of hours of training per employee based upon reports generated from within it. However, not all countries have fully adopted the platform and even those that have, still record a lot of training manually. The number we report are certainly an under-estimation.

The best coverage of the platform is found across our Metals business in Europe where six of the nine countries are able to report data. The largest sites report on average over 10 hours of training in the system per employee.

30% of employees in AGSA receive a regular performance and career development reviews we do not currently have access to the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

- The average number of reported annual training hours per employee for the Group is 10.
- The average number of reported annual training hours per employee for AMP is 37.
- The averages are based on available data, which covers 14758 employees in the Group (72% of total employees) and 4826 employees in AMP (77% of total AMP employees).
- Data was not available for Netherlands, UK, Poland (AGP), Ireland, Brazil, Ethiopia, Kenya, and Nigeria.
- At this time, due to varying systems across regions breakdown by gender and employee category is unavailable.

### GRI 404-2 Programs for upgrading employee skills and transition assistance programs

Programs to upgrade employee skills include:

- On-the-job coaching
- Internal and external course covering:
  - » technical training specific to individual jobs.
  - » IT
  - » health and safety
  - » leadership
  - » team building
  - » quality management topics
  - » languages
  - » communication skills
  - » legal and compliance topics

- Sabbatical periods with guaranteed return to employment is offered in France
- Pre-retirement planning / training for people approaching retirement is offered in the Glass business in Denmark, Germany, Sweden, US, Ethiopia, Kenya, Nigeria and South Africa.
- If an employee's receives severance pay, the calculation linked to age and years of service in all countries except the following, where it is not linked to age: Spain, Germany, Italy, US and the African countries.
- Employees whose roles are declared redundant receive outplacement support in NL, Spain, Switzerland, UK, US and the African countries.

### GRI 404- 3 Percentage of Employees receiving regular performance and career development reviews

30% of employees in Ardagh receive a regular performance and career development reviews. We do not currently have access to the percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

## GRI 405: Diversity and Equal Opportunity

**Relevance**: Ardagh values diversity and is committed to offer equal opportunities to all its current and future employees, regardless of the gender, ethnicity, colour, religion, national origin, ancestry, age, disability, marital status and sexual orientation.

**Management of material topics (GRI 3-3)**: Ardagh is committed to provide equal employment opportunity for all its applicants and employees. Ardagh aims to maintain a work environment where everyone is respected and valued. Ardagh has conducted unconscious bias training, several Diversity, Equity and Inclusion (DE&I) workshops and has launched its first employee survey to gather insights regarding DE&I. Additional information on initiatives implemented on this topic and future initiatives to be launched can be found in our Sustainability Report [Ardagh to add link and page when available]. Additionally, Ardagh is in the process of developing some KPIs related to DE&I and are expected to be ready before the publication of our next sustainability report.

**GRI 405-2** Ratio of basic salaries and remuneration female to male

The dataset includes two categories of employees – Managers and non-Managers. There is no Board category because only 5 employees are Board members. The rest of the Board members do not receive a salary as they are not employees. We included the 5 employees who are Board members in the Managers category. It does not have a material impact on the data since it covered over 1800 managers.

| Table 1: Average FTE basic salary of women as a % of men's average FTE basic salary | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | | Average basic salary of women as a % of men's average basic salary | | | | | | | | | |
| | | All employees | | Manufacturing (Operations) Manufacturing | | Support (Other) Functions Support functions | | Management (M1+) Management | | Non-management (below M1) Non-management | |
| Country | BU | % women | Pay ratio% | % women | Pay ratio% | % women | Pay ratio% | % women | Pay ratio% | % women | Pay ratio% |
| DEU-Germany | AMP | 11% | 116% | 6% | 113% | 47% | 80% | 21% | 95% | 10% | 109% |
| DEU-Germany | AGP | 8% | 108% | 5% | 98% | 48% | 70% | 13% | 83% | 7% | 107% |
| GBR-United Kingdom | AGP | 9% | 103% | 5% | 92% | 46% | 56% | 23% | 80% | 8% | 89% |
| USA-United States | AMP | 12% | 96% | 10% | 91% | 54% | 66% | 16% | 89% | 11% | 92% |
| USA-United States | AGP | 21% | 86% | 19% | 80% | 52% | 74% | 19% | 91% | 21% | 86% |
| RSA-South Africa | AGP | 21% | 72% | 15% | 70% | 47% | 34% | 21% | 82% | 21% | 68% |

| Table 2: for management roles, average FTE base salary plus target bonus of women as a % of men's average FTE base salary plus target bonus | | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| | | For management roles, average base salary plus target bonus of women as a % of men's average base salary plus target bonus | | | | | | |
| | | All employees | | Manufacturing (Operations) M1+ Manufacturing | | Support (Other Functions) M1+ Support functions | | |
| Country | BU | % women | Pay ratio% | % women | Pay ratio% | % women | Pay ratio% | |
| DEU-Germany | AMP | 21% | 95% | 13% | 86% | 29% | 99% | |
| DEU-Germany | AGP | 13% | 78% | 5% | 69% | 23% | 78% | |
| GBR-United Kingdom | AGP | 23% | 76% | 8% | 92% | 35% | 60% | |
| USA-United States | AMP | 16% | 88% | 12% | 83% | 38% | 80% | |
| USA-United States | AGP | 19% | 92% | 10% | 83% | 40% | 86% | |
| RSA-South Africa | AGP | 21% | 76% | 6% | 85% | 40% | 55% | |

## GRI 414: Supplier Social Assessment

See disclosure GRI 308: Supplier Environmental Assessment

# Human Rights Topics

## GRI 406: non-discrimination

**Relevance**: Ardagh will not tolerate discrimination of any kind. Ardagh has a policy of zero tolerance for violence. Violence includes physically harming, harassing, intimidating or coercing another human being or brandishing weapons and threatening or talking of engaging in those activities. Ardagh is committed to providing a workplace free of all types of harassment and will not tolerate harassment of employees by managers or co-workers. Ardagh will not tolerate discrimination, harassment, sexual harassment in the workplace and expects its suppliers to have the same requirements.

**Management of material topics (GRI 3-3)**: Ardagh expects all its employees to treat colleagues, suppliers and any other stakeholders fairly and respectfully, as outlined in its Code of Conduct

Employees who observe or suspect discrimination or any violations to Ardagh's Code of Conduct can confidentially and anonymously raise concerns through Ardagh's Compliance Hotline. More details can be found in Ardagh's Compliance Hotline Policy (Appendix 12 of the Code of Conduct)

As outlined in its Responsible Procurement Policy, Ardagh expects its suppliers to ensure human rights are respected in their organisations and throughout their supply chains. To ensure compliance with the policy and as part of its Supplier Social Assessment process, Ardagh requests suppliers, selected on an annual basis, to fill in a questionnaire that covers non-discrimination and the promotion of diversity. Ardagh also conducts an in-depth risk assessment of these selected suppliers.

At the moment, Ardagh's Legal team can only provide data on incidents which have been reported via Ardagh's Compliance Hotline. It does not at this stage have any insight into discrimination incidents which are reported outside the Compliance Hotline. A new process to allow for the recording and management of discrimination cases received in other ways (i.e., received directly by HR) is being implemented.

### GRI 406-1

In 2021 we had one incident, which resulted in a written warning, this was in AGP-NA.

In 2022 we had 2 substantiated cases The cases were: 1 in AMP-SA (which resulted in a termination) and 1 in AMP-NA (which resulted in a verbal warning). Corrective actions were taken following identification of these incidents, including employee dismissals, warnings to employees and employee counselling.

Please also see Code of Conduct

Appendix 8 – Employment Policy

Appendix 12 – Compliance Hotline Policy

Direct response in our GRI Index

## GRI 407: Freedom of Association and Collective Bargaining

**Relevance**: Ardagh respects freedom of association and its employees' right to collective bargaining and expects its suppliers to respect and allow this right too.

**Management of material topics (GRI 3-3)**: Ardagh supports the freedom of association and effective recognition of the right to collective bargaining.  It seeks to facilitate positive dialogue between employee representatives and management and ensure that employees' representatives are properly informed and consulted regarding Ardagh's decision-making and implementation processes. Further information can be found in Ardagh's Employee Policy (appendix 8 of the Code of Conduct).

As outlined in its **Responsible Procurement Policy**, Ardagh expects its suppliers to ensure human rights are respected in their organisations and throughout their supply chains. To ensure compliance with the policy and as part of its Supplier Social Assessment process, Ardagh requests suppliers, selected on an annual basis, to fill in a questionnaire that covers human rights such as freedom of association and collective bargaining, child labour and forced or compulsory labour. Ardagh also conducts an in-depth risk assessment of these selected suppliers.

Please also see **Code of Conduct**

**Appendix 8 – Employment Policy**

**GRI 407-1**

Direct response in our **GRI Index**

## GRI 408: Child Labour

**Relevance**: Ardagh follows the International Labour Organisation Declaration (ILO) on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy. Within these principles, Ardagh supports, among others, the freedom of association and effective recognition of the rights to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination regarding employment and occupation

Ardagh will not tolerate the use of child labour and expects the same from its suppliers. As in any international supply chain with multiple tiers of suppliers there is a potential risk of child labour within the supply chain. Ardagh works closely with its tier 1 suppliers to ensure they do not employ children and expects their tier 1 suppliers to carry out due diligence further up the value chain.

**Management of material topics (GRI 3-3)**: Ardagh does not employ or use children in any way.

Ardagh undertakes checks on employees as part of the recruitment process, including verifying the age of employees.

Ardagh undertakes risk assessments, both within its operations and of its suppliers, to identify significant risk for incidents or child labour or young workers exposed to hazardous work.  Such risk assessments take into account the type of operation/supplier and the countries or geographic areas of location of the operation/supplier.  Where necessary, measures are taken to mitigate any risk, for example through requirement of appropriate age verification on recruitment.

As outlined in its **Responsible Procurement Policy** [insert hyperlink to policy], Ardagh expects its suppliers to ensure human rights are respected in their organisations and throughout their supply chains. To ensure compliance with the policy and as part of its Supplier Social Assessment process, Ardagh requests suppliers, selected on an annual basis, to fill in a questionnaire that covers human rights such as freedom of association and collective bargaining, child labour and forced or compulsory labour. Ardagh also conducts an in-depth risk assessment of these selected suppliers.

In addition, Ardagh's commitment in this area is set out both within its Modern Slavery and Human Trafficking Statement [insert hyperlink to GRI index]   Ardagh has not identified any incidents of child labour either within its operations or its supply chain during the reporting period (2021 and 2022)

Please also see **Code of Conduct**

**Appendix 8 – Employment Policy**

**GRI 408-1**

Direct response in our **GRI Index**

## GRI 409: Forced or Compulsory Labour

**Relevance**: Ardagh will not tolerate the use of forced or compulsory labour and expects the same from its suppliers. Ardagh respects the International Labour Organisation Declaration (ILO) on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy. Within these principles, Ardagh supports, among others, the freedom of association and effective recognition of the rights to collective bargaining, the elimination of all forms of forced or compulsory labour, the effective abolition of child labour, and the elimination of discrimination regarding employment and occupation

**Management of material topics (GRI 3-3)**: Ardagh does not use forced or compulsory labour. Ardagh's commitment to ensuring no forced or compulsory labour is also made clear both in its Modern Slavery and Human Trafficking Statement [insert hyperlink] and its Responsible Procurement Policy [insert hyperlink] where Ardagh requires its suppliers to ensure human rights are respected in their organisations and throughout their supply chains. To ensure compliance with the policy and as part of its Supplier Social Assessment process, Ardagh requests suppliers, selected on an annual basis, to fill in a questionnaire that covers human rights such as freedom of association and collective bargaining, child labour and forced or compulsory labour. Ardagh also conducts an in-depth risk assessment of these selected suppliers.

Code of Conduct

Appendix 8 – Employment Policy

**GRI 409-1**

Direct response in our GRI Index

## GRI 411: Rights of Indigenous Peoples

**Relevance**: According to the UN environment programme (UNEP), at least a quarter of the world's land is owned, managed, used or occupied by Indigenous peoples and local communities. It is recognised that Indigenous peoples' heritage and knowledge of their land can contribute to sustainable ecosystem management.

Ardagh respects the rights of Indigenous peoples and is committed to ensure its sites and/or activities do not affect those rights in any ways.

**Management of material topics (GRI 3-3)**: We have an official framework in place for working with Indigenous peoples in our AGP-A region. This framework requires that at least 70% of the workforce and 50% of the management team should consist of Indigenous people.

Furthermore, we have a Responsible Procurement Policy in place and we conduct social and environmental assessments of our suppliers via surveys and audits on an annual basis. We plan to strengthen our requirements with regards to rights of Indigenous peoples, both in our Responsible Procurement Policy and our supplier assessment process.

AMP is a full member of the Aluminium Stewardship Initiative (ASI). The rights of Indigenous peoples are a critical area of focus for ASI as mining and mining-related activities often take place on, or near, Indigenous lands. AMP does not operate mines or participate in mining-related activities. As a converter of aluminium can sheet into aluminium beverage cans and ends AMP engages with its direct suppliers in alignment with the AMP Responsible Procurement Policy. By the end of 2024 Ardagh intends to review the implementation of targets in this area of policy.

**GRI 411-1**

There were no incidents of violations of the rights of indigenous people within the reporting period.

**Abbreviations used**

**AGSA** – Ardagh Group SA.

**AMP-NA** – Ardagh Metal Packaging – North America

**AMP-E** – Ardagh Metal Packaging – Europe

**AMP-SA** – Ardagh Metal Packaging – South America

**AGP-A** – Ardagh Glass Packaging – Africa

**AGP-E** – Ardagh Glass Packaging – Europe

**AGP-NA** – Ardagh Glass Packaging – North America

**Reporting assurance**

The Sustainability Committee of Ardagh, which reports into the board of directors of Ardagh (Board) and consists of selected board members and other relevant senior management, is responsible for reviewing and approving the reported information on behalf of the Board.

At the request of the Sustainability Committee, RISE (Research Institutes of Sweden) has undertaken under contract a limited assurance of the data underpinning the 2021-2022 sustainability report. In particular, the scope of the assurance provided is focused on the acquisition, processing and aggregation of the quantitative data necessary to calculate the principal environmental and health & safety key performance indicators (KPIs). The assurance has been delivered in accordance with RISE's own methodology which is based on the international assurance and audit standard ISAE 3000.

RISE has also provided advice and support to Ardagh during the preparation of the report, checking the that disclosures made fulfil the GRI requirements. For clarity, this support during the preparation of the report does not constitute formal assurance of the report, its content or any targets and claims made in the report. RISE's responsibility is solely in terms of providing limited assurance with respect to the process of gathering and processing the data that underpins the KPIs and data reported.

The assurance statement can be found [here](#).

# Further information

**Forward-looking statements**

This report contains forward-looking statements that are based on the current expectations and beliefs of Ardagh. Forward-looking statements are not historical facts and are inherently subject to known and unknown risks and uncertainties, many of which are beyond our control. Statements in this report that could be deemed forward-looking statements include, but are not limited to, any statements related to our sustainability targets, goals, commitments, focus areas, programmes, impact, outcomes, results, savings or progress towards any of the same, as well as statements related to anticipated future operating performance and results of Ardagh.

We caution you that the forward-looking statements presented in this report are not a guarantee of future events, and that actual events may differ materially from those made in or suggested by the forward-looking statements contained in this report. Certain factors that could cause actual events to differ materially from those discussed in any forward-looking statements include those set forth in the Risk Factors section and under any "Forward-Looking Statements" or similar heading in Ardagh's Annual Report for the year ended December 31, 2022. In addition, new risk factors and uncertainties emerge from time to time, and it is not possible for us to predict all risk factors and uncertainties, nor can we assess the impact of all factors on our business or the extent to which any factor, or combination of factors, may cause actual events to differ materially from those contained in any forward-looking statements. Under no circumstances should the inclusion of such forward-looking statements in this report be regarded as a representation or warranty by us or any other person with respect to the achievement of results set out in such statements or that the underlying assumptions used will in fact be the case. You are cautioned not to place undue reliance on these forward-looking statements, and unless otherwise noted, Ardagh is providing this information as of the date of this report and does not undertake any obligation to update any forward-looking statements contained in this report as a result of new information, future events or otherwise.

**Estimates and assumptions; third-party information**

This report includes certain numbers that are estimates or approximations and that may be based on assumptions. We believe that the estimates employed are appropriate and reasonable; however, due to inherent uncertainties in making estimates and assumptions, actual results could differ from the original estimates, and we may at times revisit our historical data to ensure their accuracy. Some information in this report is dependent on data that has been provided by third parties that are outside of our control.

ArdaghGroup