ArdaghMetalPackaging

Ardagh Metal Packaging 2024 Sustainability Report

We make packaging for good

Contents

Navigating this report

Throughout this report you will find references to additional information. Please look out for the following links:

Reference to another section in this report

Contents

Introduction

Basis for preparation

BP-1-5(a-b)

Welcome to our sustainability report for the year ended 31 December 2024. Except as otherwise indicated below, this report presents information on Ardagh Metal Packaging SA and its consolidated subsidiaries (together, referred to herein as AMP) and all references to "we," "us" and "our" refer to AMP.

In line with our reporting approach, we have concentrated on entities that materially contribute to our overall ESG footprint. Accordingly, this report excludes certain subsidiaries within the scope of the AMP operating business: Hart Print Inc., Hart Print USA, NOMOQ GmbH and NOMOQ Limited.

Our environmental reporting includes only data from (i) our manufacturing facilities, as these facilities represent the primary sources of our environmental impact and (ii) relevant aspects of our value chain, in line with our materiality assessment. Non-manufacturing locations – such as sales offices and warehouses – are excluded from our environmental reporting due to their immaterial contribution to our overall environmental footprint.

Our health and safety and employee-related reporting includes data from all operational production facilities, including manufacturing locations and office environments.

This report aligns with the requirements of the Corporate Sustainability Reporting Directive (CSRD) to the extent practicable, incorporating key principles and disclosure requirements from the European Sustainability Reporting Standards (ESRS). Additionally, we follow standardised reporting frameworks, including the Greenhouse Gas Protocol, for our ESRS E1 disclosures on GHG emissions. For more detail, see the Appendix (pg. 72).

To support future reporting, we have included the ESRS reference code for relevant topics below content headings. We have also provided a key to these codes, with the formal ESRS descriptors, in the Appendix.

For more detail, see the Appendix (pg. 72)

Approximately 76% of the issued ordinary shares and 100% of the issued preferred shares of Ardagh Metal Packaging SA are indirectly held by Ardagh Group SA (together with its controlled subsidiaries, including AMP, referred to herein as the Ardagh Group). See Note 1 to the audited consolidated financial statements included in the Ardagh Metal Packaging SA 2024 Annual Report for further information on our corporate structure.

This report affirms our commitment to the United Nations Global Compact (UNGC) and is a supplement to our Communication on Progress (COP), which we completed in September 2025.

Introduction continued

Message from the executive leadership team

This has been a rewarding year for AMP, with demand for our products increasing across a wide range of beverage categories. With their inherent recyclability and design qualities, consumers and brands are choosing aluminium cans over other formats, helping us to achieve double digit EBITDA gains year on year, with sales of $4.9bn. We have continued to invest in the business and our supply chain, achieving another high level of recycled content in our aluminium beverage cans.

We are clear about the contribution we can make to a more circular future through our products and the positive impacts we can have on communities through education. Driven by our Core Values of Inclusion, Trust, Teamwork and Excellence – we make packaging for good.

Our sustainability strategy guides these efforts, with ambitious goals for our Emissions, Ecology and Social pillars. During 2024, we made progress in each area, launching our Sustainability Roadmap. This sets out how we plan to make continued progress against our targets on GHG emissions, volatile organic compounds (VOCs), waste and water.

The world experienced another year of record temperatures in 2024, with floods, droughts and ecosystem impacts putting pressure on communities in every continent. In response, we have remained focused on our Emissions pillar, reducing the GHG emissions in our value chain across all Scopes in 2024, as compared to the previous year.

We continued to support renewable energy, investing in new Power Purchase Agreements (PPAs), increasing our total share to 30% renewable electricity overall. Led by our Operations teams, technology and process improvements have also delivered significant intensity reductions in emissions of VOCs from our plants during 2024.

Our Ecology pillar includes our commitment to source raw materials sustainably. Manufacturing our products using recycled aluminium avoids more than 95% of the emissions and energy,[1] compared with using virgin material. By the end of 2024, the proportion of recycled content in AMP cans was at an average of 78%,[2] one of the highest in the industry, based on public disclosures of industry peers we reviewed.

We believe clear and meaningful information matters to both brands and consumers and we have been working to strengthen the sustainability positioning of beverage can making. In collaboration with our peers via industry associations, this work took a great leap forward during 2024 with the launch of a new standardised Beverage Can Recycled Content methodology (BCRC). Announced in October 2024, this proposes a standard approach to calculating recycled content across the entire aluminium value chain for beverage packaging. We believe this methodology is widely being adopted and will be the industry standard going forward, creating transparency and enabling accountability.

Production facilities are vital to our sustainability plan. To support the growth in our aluminium packaging business, during 2024 we launched the Ardagh Metal Production System (AMPS), providing our global teams with a singular approach to process improvements. It combines data, effective management, training and regular communications with the aim to standardise operations across 100% of our production facilities. The system achieves higher levels of quality and, crucially, supports sustainability goals by improving operational efficiencies, including reducing materials' usage.

Innovation for efficiency was a big theme for the year. We invested a total of $7.7 million on technologies and operational improvements, which have reduced our thermal energy and electricity consumption in 2024 as compared to 2023.

Our technology teams have also pioneered advanced lightweighting and downgauging techniques, enabling the production of high-quality cans with reduced aluminium usage.

In 2024, we placed significant emphasis on our Social pillar. Through a focus on training and the delivery of supporting action plans, we achieved improvements in health and safety metrics within AMP's production facilities. Enhancements included better machine operation protocols and a reduction in slips, falls and lost time due to injuries.

Our Ardagh for Education programme continued to grow during 2024. We are on track to reach our Ardagh Group target of 1.2 million students, with grants of $5 million to a wide variety of schools in all the regions where we operate.

Employee surveys showed high engagement and highlighted communication opportunities. This has led us to enhance team interactions with senior management and to launch new internal digital channels. Externally, we proudly received an EcoVadis Gold award for sustainability management and made CDP's (formerly known as the Carbon Disclosure Project) A-list for supplier engagement.

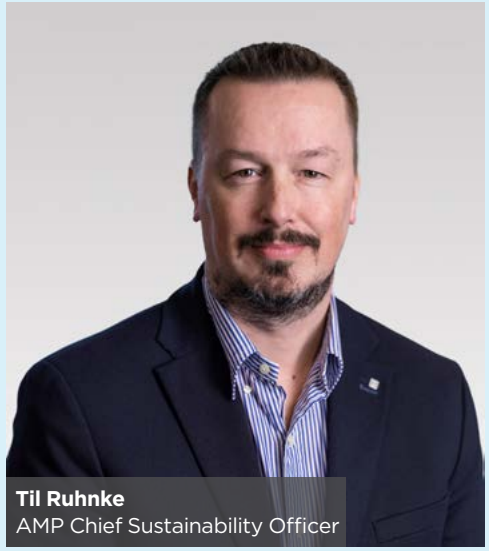
The geopolitical context for our business remains complex. But our commitment to ecosystems and communities remains as strong as ever. We aim to meet the demand for packaging that is easy to recycle and reduce our environmental impact. We will also create more opportunities for the communities who we serve and from which we recruit. Together, we will endeavour to fulfil aluminium's role in a more sustainable economy, where circularity is not an aspiration but a reality.

Oliver Graham
Chief Executive Officer

Til Ruhnke
Chief Sustainability Officer

1 Source: https://www.aluminum.org/Recycling
2 Percentage assured independently by the Research Institutes of Sweden, May 23rd, 2025.

Oliver Graham
AMP Chief Executive Officer



Til Ruhnke
AMP Chief Sustainability Officer

Introduction continued

Products, markets and customer groups

SBM-1-40 (f)

AMP is one of the leading producers of aluminium drinks cans – the world's most recycled beverage packaging. Made from a durable metal that can be reprocessed with minimal losses, we believe our products can play a key role in a more circular economy, reducing environmental pollution and emissions. Our customers are brand owners across Europe, North America and South America.

As a manufacturer with a complex supply chain and a presence in multiple locations, we work to achieve the best environmental performance that is economically possible. We are committed to identifying, measuring and improving outcomes in all aspects of our value chain – from the energy we procure, to the metal we source, to how our products are collected and recycled. We are known for innovative production techniques, the outstanding quality of our products and our commitment to customer service.

AMP is one of the few pure-play aluminium beverage can producers of scale in the market today. We operate 23 production facilities in nine countries, with revenues of $4.9bn in 2024. As of year-end 2024, AMP employed approximately 6,200 individuals across our operations, excluding joint ventures and non-consolidated subsidiaries.

The regional distribution of our workforce is as follows:

- **AMP-Europe:** 3,402 employees across the UK, several EU countries, Serbia and Switzerland
- **AMP-North America:** 1,820 employees in the US
- **AMP South America:** 946 employees, all located in Brazil

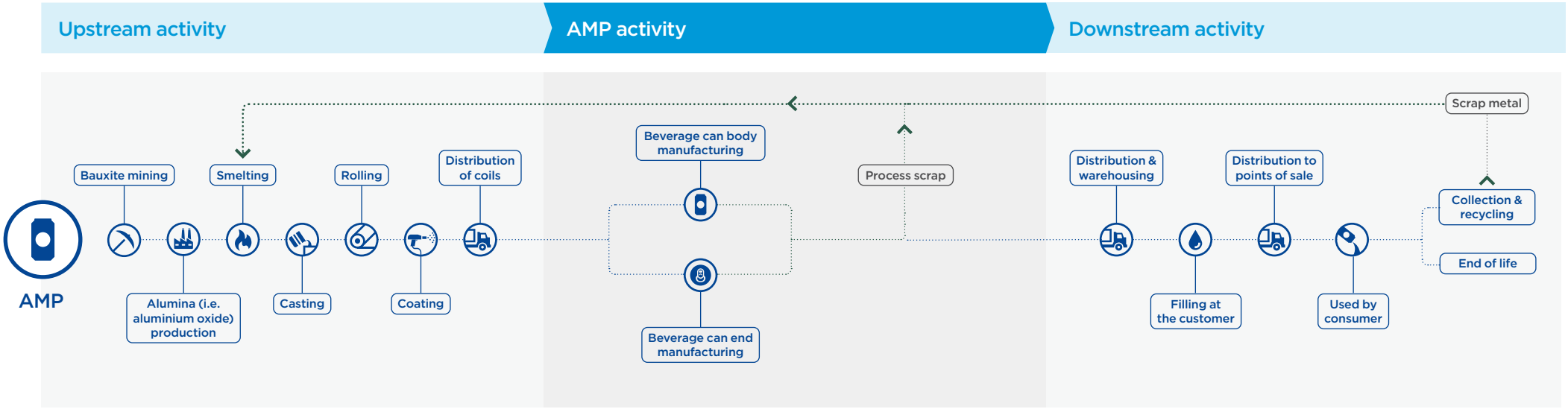
Features of the upstream and downstream value chain

SBM-1-42 (c)

AMP occupies a midstream position within the packaging value chain. We transform prime and recycled aluminium into finished metal containers for use in the beverage sectors.

Upstream, we source aluminium coils from global and regional suppliers. We procure energy from utilities through private contracts, increasingly from renewable sources. Key upstream partners include raw material suppliers, equipment manufacturers and industry recycling systems.

Downstream, we deliver products to a customer base that includes multinational brand owners, as well as small and medium-sized local and regional producers. Partnerships with industry consortia, local municipalities and recyclers support our end-of-life recovery and recycling goals. While AMP does not directly control post-consumer recovery, our product design and stakeholder engagement strategies promote recyclability and circularity across markets.



ESRS 2 General disclosures

ESRS 2 General disclosures[1]

Strategy, business model and value chain

SBM-1-40 (a-c), SBM-1-40 (g)

The AMP sustainability strategy reflects our dedication to environmental stewardship and our commitment to create long-term value for our stakeholders and the communities we serve. Through continuous improvement and collaboration, we strive for a more sustainable and resilient future.

At AMP, our key strategic levers are:

- Reducing energy usage and driving efficiencies in all our operations
- Transitioning to renewable electricity and alternative low-carbon thermal solutions
- Reducing material consumption through product design and increasing recycled content use in aluminium
- Identifying technologies and promoting further low-carbon aluminium sourcing
- Reducing water use and waste while maintaining operational efficiency
- Adapting to evolving regulatory and customer expectations around circularity and decarbonisation

Our sustainability targets

GHG emissions: Our sustainability-related goals apply consistently to all of our regional AMP operations: AMP-Europe, AMP-North America and AMP-South America. We have adopted near-term Science-Based Targets (SBTi) for greenhouse gas emissions which are globally applicable across all regions. They include the following absolute reductions from a 2020 baseline, see below:

- 42% in Scope 1 and 2 emissions by 2030
- 12.3% in Scope 3 emissions by 2030

For more detail, see Climate change (pg. 16)

While these targets apply at the corporate level, the associated reductions will not be distributed equally across all regions or facilities. Some facilities may contribute a larger share of the reductions due to technological readiness, investment timing, or regional regulatory and market conditions.

- **VOCs:** In addition to our climate goals, AMP is committed to reducing VOC by a 10% reduction by 2030.

For more detail, see Pollution (pg. 28)

- **Water:** We have also committed to improving water stewardship, with a 20% reduction in water intensity by 2030 across all operations.

For more detail, see Water and marine resources (pg. 33)

- **Waste:** All regions are aligned on achieving zero waste to landfill by 2025.

For more detail, see Resource use and circular economy (pg. 41)

- **Circularity:** We are advancing circularity through the increased use of recycled content in our metal packaging, supporting both resource efficiency and emissions reduction.

For more detail, see Resource use and circular economy (pg. 41)

Emissions & Ecology

Minimise our GHG emissions

- Approved SBTi targets
- Transition to 100% renewable electricity
- Implement energy efficiency projects
- Increase recycled content
- Innovate in product design
- Source sustainably
- Partner on low carbon transport
- Minimise VOC emissions

Minimise our ecological impact

- Achieve excellence in water management
- Promote zero waste to landfill across all facilities
- Support increased recycling management and use of recycled content
- Promote circularity narratives across all facilities on use of infinitely recyclable material

Social

Our people

- Maintain a safe and healthy workplace
- Promote diversity, equity and inclusion (DE&I)
- Empower our people to participate in impactful social initiatives in our local communities

Our communities

- Strengthen our local communities by participating in community projects and making charitable donations
- Continue our investments in Ardagh for Education

Sustainability filter

Impact is only sustainable if it is economically viable, both in the long- and short-term

1 Please note that additional ESRS 2 General disclosures content appears in the Appendix.

ESRS 2 General continued

2024 Progress to targets

SBM-1-40(e)

We remain committed to the sustainability objectives articulated in our sustainability strategy. In 2024, despite annual sales volume growth of 3%, we continued to make significant progress against all our targets.

Our progress to targets – 2020 baseline year

	Metric[1]	Target to 2030 unless otherwise stated	Status
Emissions	Renewable electricity	100%	30% Progress to target
Emissions	Absolute Scope 1 & 2 GHG emissions	42% reduction	2% increase from 2020[2]
Emissions	Absolute Scope 3 GHG emissions	12.3% reduction	Stated target met during 2024[2]
Emissions	VOC emissions intensity	10% reduction	89% Progress to target[3]
Ecology	Water withdrawal intensity	20% reduction	30% Progress to target[3]
Ecology	Zero waste to landfill by 2025[4]	100%	83% Progress to target

1 The Research Institutes of Sweden (RISE) provided limited assurance of the acquisition, processing and aggregation of the quantitative data necessary to calculate the principal 2024 environmental and health and safety KPIs reported.
2 Market-based approach used.
3 Intensity metrics shown include can body production facilities only (excluding Huron, Ohio – since this facility produces both cans and ends), as water and VOC emissions from ends production is insignificant.
4 Zero waste to landfill applies only to operational waste streams, and is implemented in accordance with internal standards and local regulations.

Renewable electricity: We secured more renewable electricity coverage, increasing the total by 10% in 2024 from 2023 levels, to 30% across our global footprint. This included a new 46% total share of renewable electricity for Europe, up from 35% in 2023 and 43% for South America, as well as an increase of 10% in North America.

We have invested in Power Purchase Agreements (PPA) including a new contract with Sunnic Lighthouse GmbH in Germany and BNZ in Portugal. The PPA will secure solar energy allocation across our European facilities, facilitating our 100% renewable electricity transition. The Transition Plan section has more detail on our PPA activities and how we aim to meet our target.

Scope 1 and 2 GHG emissions: In 2024, our combined absolute total was 2% higher than in the 2020 baseline year, despite a significant increase in sales. During this period, we made significant improvements in efficiency, reducing our Scope 1 and 2 emissions intensity by 18% compared to the baseline. In fact, our combined absolute Scope 1 and 2 emissions were 10% lower than in 2023. This was primarily the result of a US$3.8 million investment in operational efficiency and renewable electricity, reducing energy demand.

Scope 3 emissions: Our total for 2024 reduced compared to 2023, and we exceeded our 2030 target significantly, reaching a 25% reduction from the baseline year. In 2024, the proportion of recycled content in our cans reached 78%, up from 64% in 2020 – one of the highest levels in the industry based on public disclosures of industry peers we reviewed. We aim to continue this positive momentum and secure more sources of recycled metal to reduce Scope 3 emissions further.

VOC intensity: This continues to be on track with a 9% reduction in 2024 compared to our baseline year of 2020, meaning that we have progressed 89% towards our 2030 target. This follows an investment of US$2.4 million in a combined new technology and materials approach.

Water intensity: We reached 30% of our water intensity target in 2024, an improvement of 5% compared to 2023, and as part of our water roadmap, we have identified projects that we deem suitable to achieve the targeted reduction. In all our operating regions, we are taking key steps to reduce our water consumption and to protect this valuable resource.

Waste to landfill: During 2024, 83% of our plants achieved zero-waste to landfill (ZWTL). Based on 2024 progress, we believe we are well positioned to meet our 2025 target of 100% ZWTL for all our plants.

ESRS 2 General continued

Double materiality assessment

To align with forthcoming ESRS requirements, we carried out our first double materiality assessment (DMA) in 2024.

The DMA was a key step forward in aligning our sustainability initiatives with both stakeholder expectations and organisational priorities. This process not only strengthened the foundation of our existing ESG strategy but also deepened our understanding of the impacts and risks critical to our operations, stakeholders and the environment.

Building on our previous ESG risk assessment practices, the DMA introduced a more comprehensive perspective by incorporating impact considerations into the risk matrix. As this was our first DMA, it applied a conservative scope and threshold. This sought to ensure a robust and reliable representation of our impacts, risks and opportunities (IROs), which will be refined in future assessments.

Key findings and alignment with corporate strategy

The DMA identified our most material topics, reflecting the priorities of stakeholders and areas that pose potential risks and opportunities for our operations. Although the 2024 evaluation assessed some topics as being less material, this does not imply they are unimportant. Rather, they currently hold less relative significance compared to other IROs.

We remain committed to regularly monitoring sustainability topics and reassessing their relevance through an annual review of the DMA. This process aims to keep us responsive to evolving risks and opportunities.

ESRS 2 General continued

Material impacts, risks and opportunities and their interaction with our strategy and business model

SBM-3

The materiality matrix provides a high-level overview of the most significant topics identified through the DMA process. To ensure alignment with our organisational objectives and stakeholder expectations, each ESRS topic received an evaluation at a subtopic level. The Appendix contains an outline of the methodology in detail. At the start of the relevant chapters, we have included the identified IROs highlighted in the DMA exercise.

For more detail, see Appendix (pg. 72)

Own Activities

Impact Material • E4 Biodiversity	**Both** • E1 Climate change • E2 Pollution • E3 Water • E5 Resource use and circular economy • S1 Own workers • S2 Workers in the value chain • G1 Governance
Immaterial • S3 Consumers and end users • S4 Affected communities	**Financially Material**

Impact Materiality

Financial Materiality

Value Chain Activities

Impact Material • E3 Water • E4 Biodiversity • S2 Workers in the value chain	**Both** • E1 Climate change • E2 Pollution • E5 Resource use and circular economy • S2 Workers in the value chain
Immaterial • S3 Consumers and end users • S4 Affected communities	**Financially Material**

Impact Materiality

Financial Materiality

ESRS 2 General continued

Interests and views of stakeholders

SBM-2, 45(b-d)

We engage with a broad spectrum of stakeholders – including customers, suppliers, employees, local communities, investors, industry associations, and regulatory bodies – across all regions. The frequency and format of engagements vary depending on the nature of the relationship and the issues involved. We engage through formal mechanisms such as customer sustainability forums, supplier assessments, employee town halls and structured community partnerships.

We also participate in cross-sector initiatives such as Ardagh for Education in Brazil, Germany, South Africa and the United States. These interactions aim to align our business with stakeholder expectations, identify risks and opportunities early, co-develop solutions and maintain our social licence to operate. Insights gained inform our target-setting, investment decisions and strategic planning – particularly in areas such as circularity, emissions, diversity and inclusion, and local impact.

Stakeholder engagement is embedded in our daily operations. We collaborate with suppliers and customers to innovate and support the green transition, while our employees drive continuous improvement across the network. We maintain active dialogue with the financial community – primarily institutional investors and analysts – through our Investor Relations function. The perspectives of all stakeholders are vital to shaping our business model and strategic direction and AMP is directly involved in these efforts. The AMP Board of Directors (Board) as well as the Board Sustainability Committee are regularly updated on stakeholder insights, particularly in the context of strategy and risk management.

ESRS 2 General continued

Stakeholder influence on amendments to strategy or business model

SBM-2-45(c)

Stakeholder	Engagement occurs	How it is organised	Purpose	Outcomes, applied
Customers	Regularly	• Periodic reviews and meetings with customers • Customer support queries • Day to day interaction	• Fulfil orders and achieve customer satisfaction • Understand the demand for green solutions and customer expectations • Provide transparency and build trust	• Customer feedback is used to improve our product offering • Adaptation of marketing strategies
Employees	Regularly	• Learning and development • Employee engagement surveys • BeWell programmes • Day to Day interaction	• Support employee wellbeing, engagement and development • Understand employee expectations and challenges	• Employee feedback leads to actions that help deliver a happy and engaged workforce • Internal policies developed and communicated
Suppliers	Regularly	• Interviews and assessments for supplier due diligence • Workshops and industry collaborations, e.g. CMI	• Promote responsible sourcing, including of aluminium • Protect the human and labour rights of workers • Ensure a respectful working environment • Decarbonise our value chain and promote circular solutions for resource use • Understand supplier needs and concerns	• Informed procurement decisions • Collaboration for low-carbon solutions and sourcing
Investors and ESG analysts	Regularly	• Quarterly reporting and earnings calls • One-to-one investor relations meetings	• Ensure transparent market communication and dialogue • Understand investor concerns	• Investor feedback is part of the corporate decision-making process • Action plans initiated to improve ESG performance
Regulators and consultations	Adherence to regulatory requirements	• Consultation where required • Site inspections	• Ensure we are up-to-date with compliance requirements	• Changes impact business decisions, procedures and reporting
Industry associations	Regularly	• Workshops and industry conference and committee representation	• Obtain information or collaborate on common industry goals • Develop industry standards for sustainability • Pool efforts to decarbonise hard-to-abate sectors in our supply chain	• Feedback and information inform business decisions and projects
ESG rating agencies	Annually	• Reporting on ESG frameworks	• Create transparency and share ESG data	• Demand for data and information informs our reporting practices

ESRS 2 General continued

Outcomes of current and expected benefits for customers, investors and other stakeholders

SBM-1-42(b)

AMP's primary output is aluminium containers for use in beverage applications. These outputs are produced to meet stringent safety, recyclability and performance standards. We believe these enable downstream sustainability benefits for our stakeholder groups, such as:

- Customers: Our packaging supports lifecycle emissions reductions, improved recyclability and brand alignment with sustainability goals.
- Investors: Our focus on operational efficiency, decarbonisation and waste reduction contributes to long-term resilience and value creation.
- Employees and local communities: These groups benefit through workforce development programs and social investment initiatives.

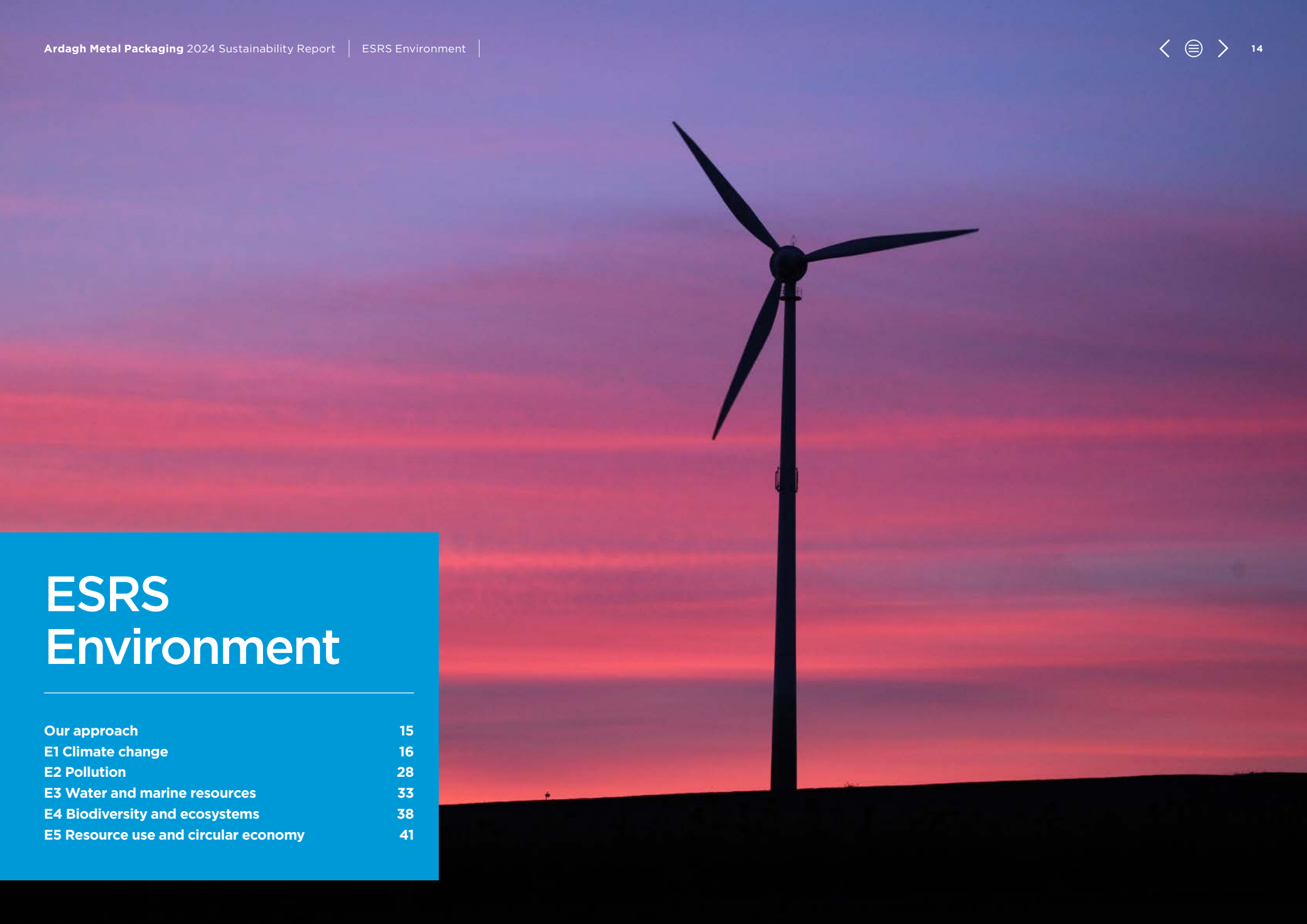
Expected outcomes over the medium- to long-term include continued emissions reductions via SBTi-aligned targets. We also anticipate improved water stewardship, higher circularity through the increased availability of recycled aluminium and enhanced regulatory compliance across markets. We expect these outcomes to contribute to AMP's reputation as a sustainability-aligned supplier.

Inputs and approach to gathering, developing and securing those inputs

SBM-1-42(a)

Energy inputs vary by region and include natural gas and electricity from both grid and renewable sources. We draw water from local municipal and groundwater systems, with closed loop reuse wherever possible. Our key inputs include prime and recycled aluminium coils, coatings, along with energy, water and skilled labour. We procure materials through supplier contracts, with due diligence applied to environmental and labour practices.

See Workers in the value chain for more information (pg. 58)



ESRS Environment

Our approach

With average global temperatures breaking records again in 2024 and natural resources under pressure on every continent, we take environmental actions across our value chain.

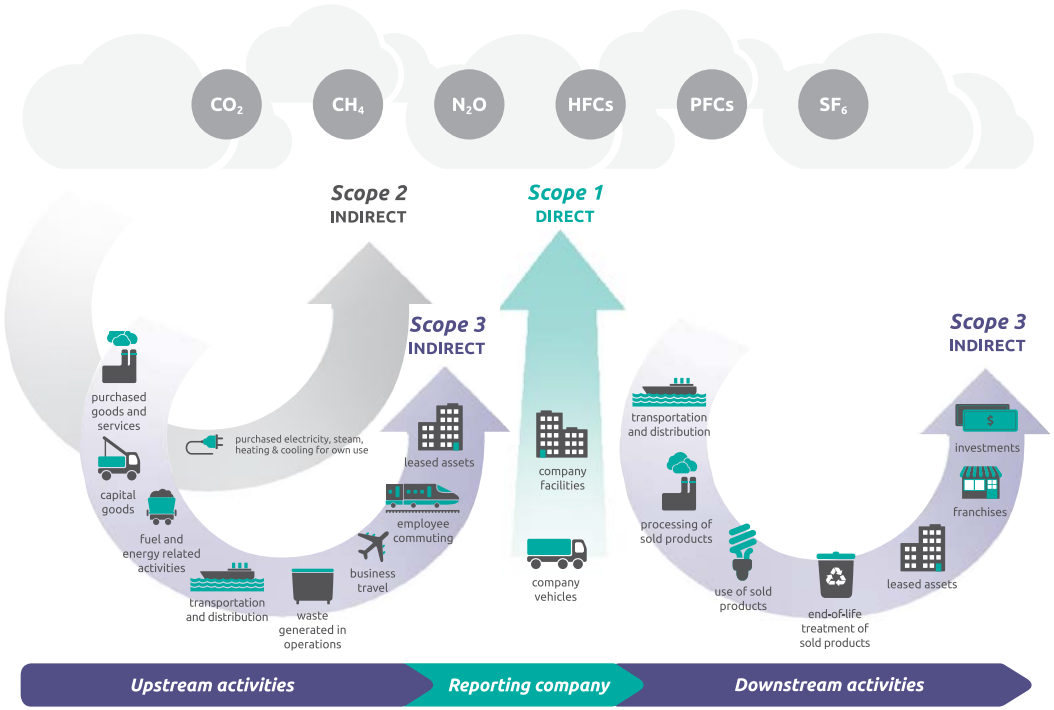
We are committed to creating a better future for our people and the planet. We produce some of the most recyclable packaging products in the world, which can play a key role in a more circular economy, reducing waste and environmental pollution and limiting emissions.

Our focus is on reducing energy consumption and emissions, while maximising recycling rates and optimising materials usage. We collaborate closely with our suppliers to advance low-carbon aluminium technologies and invest in renewable energy solutions, helping to reduce our Scope 1, 2 and 3 emissions.

With a high raw material value and their relative simplicity to recycle, we believe aluminium beverage packaging can contribute to a sustainable, closed-loop system. Promoting industry-wide recycling and the use of recycled content is a critical step towards achieving our Scope 3 GHG emissions reduction targets. Our procurement strategy and collaboration with suppliers have helped us to achieve high rates of recycled aluminium in our cans.

All our production facilities operate using robust environmental management systems, with a focus on continual improvements. We place great importance on responsible waste management, avoiding landfill usage and striving to minimise water consumption wherever possible.

Overview of GHG Protocol scopes and emissions across AMP's value chain[1]



1 Copyright: GHG Protocol.org

ESRS E1: Climate change

Introduction

Our climate change strategy focuses on reducing energy consumption and emissions, while maximising recycling rates and optimising materials' usage. Made from a durable metal that can be reprocessed with minimal losses, we believe our products can play a key role in a more circular economy, reducing emissions and environmental pollution.

Climate change IRO table[1]

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Climate change adaption								
Manufacturing activities require significant energy use, contributing to greenhouse gas emissions.	Negative impact	Developing a decarbonisation roadmap to ensure our business meets our sustainability targets while continuing to grow.		●		●		
Risks related to physical changes in climate, such as more extreme weather events, may impact operational efficiency.	Risk	Using scenario analysis to inform long-term capital investments and operational decisions.	●	●				●
Promoting a circular economy model, including reuse and recycling, can reduce waste and emissions.	Opportunity	Collaborating across the value chain, including strategic engagement with suppliers on low-carbon materials and customers on recyclable product design.	●	●	●	●		
Climate change mitigation								
Implementing energy-saving measures, efficiency improvements including waste practices, in the manufacturing process can reduce GHG emissions and contribute to climate change mitigation.	Positive impact	Evaluating and testing step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions. We remain committed to long-term investment that supports enduring operational improvements.		●		●		
Transitioning to low-carbon technologies and energy sources can reduce Ardagh's carbon footprint and contribute to climate change mitigation.	Opportunity	Investing in technologies to enhance operational efficiency and reduce our thermal energy and electricity consumption.		●			●	
Failure to meet emissions reduction targets or comply with future potential governmental regulations might result in fines or legal action.	Negative impact	Promoting ongoing efficiency enhancements through our Energy and Carbon Management Guidelines, in alignment with the principles of our Responsible Procurement policy.	●	●	●			●
Energy								
Energy use for production processes within metal such as alumina production and smelting contribute to GHG emissions and climate change.	Negative impact	Disclosing in our Responsible Procurement Policy that our suppliers must understand their organisation's environmental footprint and establish a programme for environmental stewardship.	●			●		
Encouragement of proper disposal and recycling can minimise energy usage.	Positive impact	Collaborating across the value chain – including industry associations, suppliers and customers – to improve glass and aluminium collection and recycling rates, which supports energy savings and increases recycled content in packaging.		●	●	●		
Increasing energy costs could affect the cost of raw materials, operating expenses and overall profitability.	Risk	Monitoring energy price volatility as a cost driver and mitigating exposure through strong procurement practices and supplier partnerships. We also invest in renewable electricity where feasible – including onsite, near-site and direct-connect PPAs – to reduce long-term energy cost risk.	●	●				●

1 Adapted from the Ardagh Group DMA.

ESRS E1: Climate change continued

Our decarbonisation roadmap

E1-1-16(i)

In 2024, we published the AMP structured decarbonisation plan. The roadmap sets out our aims to reduce emissions for Scopes 1, 2 and 3 and applies to all AMP operations.[1]

AMP's sustainability strategy is focused on three pillars: Emissions, Ecology and Social. We aim to reduce emissions, material use, waste and water consumption while fostering a diverse and inclusive work environment and making a positive impact on the communities in which we operate.

While this broader strategy remains valid and unchanged, we recognise the reality of advancing climate change and an increasing public and regulatory focus on the topic. With recycled aluminium avoiding over 95% of the emissions of virgin material,[2] increasing the presence of recycled aluminium in our cans is a key environmental priority and business opportunity.

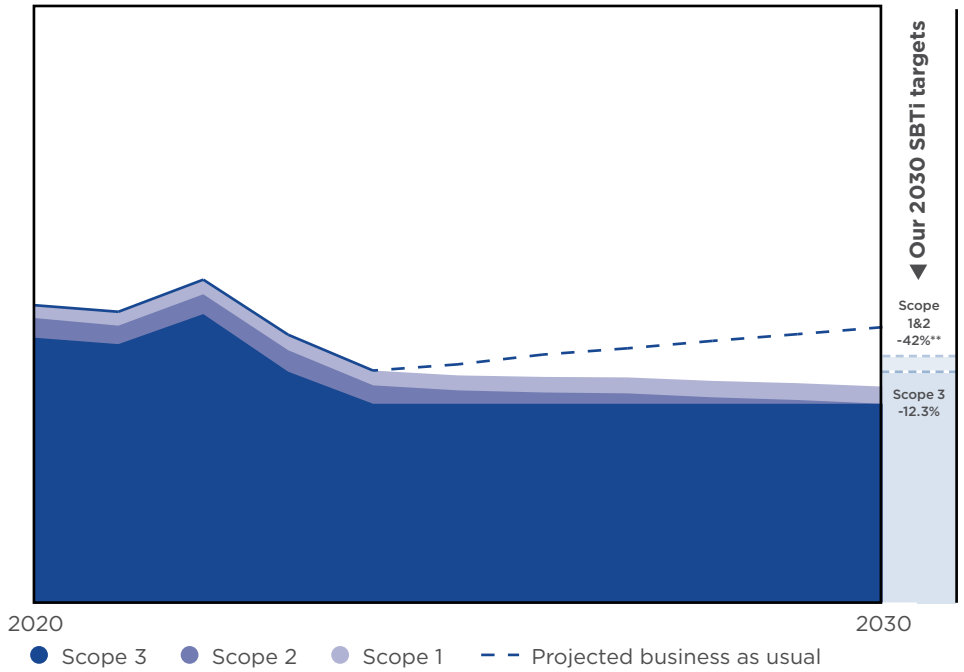
In 2022, SBTi-approved our 2030 emissions reduction targets. Aligned to the Paris Agreement, these guide our decarbonisation roadmap. These include a commitment to reducing our Scopes 1 and 2 greenhouse gas (GHG) emissions in line with limiting global warming to 1.5°C. Our harder-to-abate Scope 3 emissions targets support a limiting of global warming to 2.0°C.

Decarbonisation levers

E1-1-16(b)

At AMP, we are committed to our sustainability goals and progressing toward our 2030 SBTi-approved targets.

Fig. 2024 AMP Decarbonisation roadmap[1]



The image and information shown is for illustrative purposes only and may not be an exact representation of our roadmap.

Our key levers for decarbonising are:

- **Energy efficiency:** Reducing energy usage and driving efficiencies in all our operations
- **Energy transition:** Transitioning to renewable electricity and alternative low-carbon thermal solutions
- **Sustainable transport:** Investing in lower-carbon transport
- **Circularity and material use:** Reducing material consumption through product design and increasing recycled content use in aluminium
- **Innovation:** Identifying technologies and promoting further low-carbon aluminium sourcing

We continue to explore other levers to maximise impact this decade, including selecting technologies for sustained decarbonisation beyond 2030.

Investment and funding to support the decarbonisation roadmap

E1-1-16(c) & E1-1-16(e)

Following the setting of our 2030 SBTi-approved targets, we initiated both capital and operational investments to meet them. These include programmes to reduce carbon dioxide and equivalent (CO_2e) emissions across Scopes 1 and Scope 2 to support our decarbonisation roadmap.

In 2024, AMP invested $2.64 million in technologies to enhance our operational efficiency and reduce our thermal energy and electricity consumption. To support both the reduction of our CO_2e emissions for Scopes 1 and 2, as well as our VOC emissions' intensity, we invested more than $5 million in new technologies in our manufacturing facilities.

To help reach our 2030 renewable energy target of 100%, we continued to enhance our electricity procurement strategy. In 2024, we invested approximately $270,000 to secure PPAs, renewable energy contracts and certificates – all contributing to the reduction of our Scope 2 emissions.

We continued to innovate with our customers and suppliers. In 2024, we conducted trials on processes and technologies to further reduce the raw material consumption of our facilities. These included optimisation projects which enhance the performance and quality of aluminium beverage cans.

We have also raised the recycled content across our product portfolio, reducing our overall Scope 3 emissions by a significant margin beyond our 2030 target. To support this progress, we made investments of just over $2.74 million in innovative manufacturing solutions. Progress so far indicates that these new techniques will make significant further improvements to the emissions profile of our products.

1 AMP operations manufacture aluminium beverage cans without the participation of industries that violate the United Nations Global Compact (UNGC) principles or which are excluded from the EU Paris-aligned Benchmarks (ESRS E1-1-16.g).
2 Source: Aluminum Association, https://www.aluminum.org/sustainability

ESRS E1: Climate change continued

Assessing potential locked-in emissions

E1-1-16(d)

We recognise that we need to mitigate potential locked-in GHG emissions – those that are inherent to legacy processes and systems.

The causes of locked-in emissions may include the relatively long lifespan of beverage can manufacturing facilities, with complex assets that are expensive and hard to replace. They can also arise due to the use of aluminium as a primary raw material, whose production can be energy intensive. To address these challenges, we have continued to do the following:

- Invest in energy efficient practices to reduce energy consumption
- Source more renewable energy
- Reduce raw material consumption
- Advocate for higher recycling rates through our trade associations
- Work in partnerships with our suppliers to procure more can sheet with a higher recycled content
- Support industry initiatives to reduce energy-intensive virgin aluminium mining which accounts for the overwhelming majority of GHG emissions of our products.

Strategic alignment and Board approval

E1-1-16(h)

Governance of AMP's climate strategies, including its decarbonisation roadmap, is overseen by the Board's Sustainability Committee. The Sustainability Committee monitors progress against the AMP's current decarbonisation roadmap. In addition, the Sustainability Committee is responsible for reviewing, and recommending to the Board for approval, any changes to the targets set out in AMP's decarbonisation roadmap. Function leaders in Sustainability, Operations and Finance have assigned management roles with formal accountability processes on performance.

Decarbonisation roadmap progress

E1-1-16(j)

SBTi has approved our emissions reduction plan.

We have set ambitious targets to reduce Scopes 1 and 2 GHG emissions by 42% and Scope 3 GHG emissions by 12.3% by 2030, versus our 2020 baseline year. Significant business growth during 2024 led to an increase in absolute Scope 1 and 2 emissions of 2% from the 2020 baseline. To address this, we have initiated the following:

- Established Scope 1 efficiency projects, upgrading to equipment with higher efficiency, optimising settings including introducing waste recovery. See emissions reductions table on page 24
- Entered into new renewable electricity PPAs with the following partners:
  - Sunnic Lighthouse GmbH in Germany: The PPA will secure a solar energy supply allocation to our facilities in Germany, which makes this the first of its kind to supply renewable energy to both AMP and to AGP, our sister company
  - BNZ in Portugal: This PPA, commencing in 2026, will, over 12 years, annually secure 146 GWh of renewable electricity certificates, offsetting approximately 36% of AMP's mainland European energy consumption
- Created innovation programmes with significant investment of $1.8 million. We are working in partnership with our suppliers and customers to reduce our material consumption and enable increased recycled content product design to support our Scope 3 emissions reduction plan.

Policies addressing climate change mitigation and adaption

E1-2.24(a) & E1-2-24(b)

AMP's Enterprise Risk Management (ERM) Policy and Framework cover all major risks, including those climate-related:

- AMP Responsible Procurement Policy: Encourages all suppliers to be engaged in their GHG emissions reduction efforts
- Environmental Policy: Supports the AMP sustainability strategy and the achievement of our climate change and broader targets and is included in our Code of Conduct

Policies addressing energy efficiency

E1-2.25(c)

The AMP Responsible Procurement Policy requires suppliers to continually identify and implement energy saving initiatives where applicable. The AMP Responsible Procurement Policy also encourages suppliers to contact us if they have any suggestions for collaborative projects.

Policies addressing renewable energy deployment

E1-2.25(d)

The AMP Responsible Procurement Policy indicates that our suppliers should move away from non-renewable energy sources when feasible and economically viable. In the interim, expectations have been set of suppliers to identify and implement energy saving initiatives where applicable.

ESRS E1: Climate change continued

Actions and resources to meet climate change policies

E1-2.25(d)

At AMP, we have been tackling our emissions by taking a holistic approach to our operations and across our supply chain.

We have sought to drive efficiencies and to deliver through innovative solutions in manufacturing. We procure renewable energy when feasible and economically viable, and we work in close collaboration with our industry associations to increase recycled content and to reduce the direct and indirect emissions of our materials.

We have set ambitious goals to deliver on our 2030 SBTi targets through the following key levers:

- **Implementing several significant Scope 1 and 2 efficiency projects.** Despite growing year on year, AMP has demonstrated that we have made the right strategic investments, continuing to reduce our Scope 1 and 2 GHG emissions by 12% in 2024 compared to 2023 – per 1,000 units of finished goods.
- **Trialling further step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions.** We continue to invest for long-term change within our operations. During 2024, we invested $7.74 million on sustainability projects across our global footprint.
- **Focusing on delivering our ambition to use 100% renewable electricity by 2030.** Our power purchase strategy continues to deliver improvements across our global operations. In 2024, we increased our global renewable electricity coverage by 10%, compared to 2023. We also successfully signed a Virtual Power Purchase Agreement in mainland Europe, taking our consumption of renewable electricity to 46% in 2024.
- **Targeting a reduction in our volatile organic compound (VOC) intensity of 10% by 2030.** We invest in technologies to neutralise VOCs and improve our energy efficiency. In 2024, we spent over $2.37 million, achieving 89% of this target. This included a pivotal shift in our operations to increase aluminium production. On December 31st, 2023 we ceased steel production in Weißenthurm, initiating a new aluminium can production line at the same location during 2024. These changes resulted in substantial environmental benefits, with 50 tonnes of reduction in VOC emissions, (equivalent to 51%) at the facility in 2024 versus 2023.
- **Working in partnership with our aluminium suppliers to continue to increase recycled content.** During 2024, the recycled content of our aluminium beverage cans continued to be leading – based on public disclosures of industry peers we reviewed – at a global average of 78%.[1] During 2024, we made investments of $2.74 million in innovation projects.

Aluminium beverage cans are uniquely placed to support decarbonisation, using technology and other levers that are already available today. They combine a high percentage of recycled content, minimal process losses and a high intrinsic value, making them attractive for informal and commercial collection systems. Highly circular, with potentially lower emissions, beverage cans represent a valuable opportunity to help deliver a more sustainable economy.

1 Percentage assured independently by the Research Institutes of Sweden, May 23rd, 2025.

2 Source: https://european-aluminium.eu/wp-content/uploads/2025/02/EA-MPE-BevCan-2022-Recycling-Results-Press-Release-10-February-2025.pdf

In several markets, including Europe, aluminium associations[2] have identified an increase in metal recycled from beverage cans. This suggests that a significant reduction in CO_2 emissions is already happening. To sustain this progress, it is essential for the industry to continue investing in recycling and innovation. This will enable lower-emissions products and drive regulation and activities that support future increases in consumer recycling rates.

As our sector moves towards the reality of an almost fully circular beverage can, we continue to remain an active and engaged industry partner. We collaborate with our industry partners to further enable decarbonisation and recycling across the entire beverage can value chain.

Nature-based solutions to support climate objectives

E1-2.25(a)

As well as industrial initiatives, we also leverage our scale and network to support ecosystems to mitigate CO_2 emissions.

During 2024, our initiatives included:

- **Sustaining progress on zero waste to landfill:** We have continued to improve our waste reduction measures across our facilities, reducing potential GHG emissions, including of methane. In 2024, this included ongoing improvements to our performance in our facilities, enhancing performance on waste recycling and recovery. These initiatives have contributed to a rise from 75% to 83% ZWTL in 2024, keeping us on track to meet our 2025 100% target.
- **Supporting consumer recycling and awareness:** We are funding partners and have continued to support the industry initiative Every Can Counts (ECC). This international organisation creates can-collecting interventions in public venues such as sports stadia and music festivals. These raise the profile of aluminium's recyclability and build support for initiatives such as Deposit Return Schemes and funding for recycling infrastructure. ECC expanded in 2024, with representation in both UAE and the United States.
- **Reducing the water intensity of our industrial processes:** We continued our ongoing programme to improve the efficiency and ability to treat and recycle water used in our plants. This included implementing new monitoring technology at our can body plant in Valdemorillo, Spain. Real time data and flow control resulted in over 30% water savings from our 2020 baseline year. With water resources under increasing pressure from industry, human development and climate change, we are on track to achieve our 20% reduction 2030 target, reducing intensity by 6% since our baseline year.

For more detail, see Spotlight story (pg. 36)

Investing in lower-carbon transport

E1-3

We have continued to work with our logistics partners to reduce transport emissions and lower costs.

A key initiative for the year was the expansion of our relationship with logistics partner Cargo Service Europe (CSE). Their large lithium-ion battery trucks are paired to transport huge volumes of aluminium can bodies from our Oss, Netherlands plant to CSE's logistics distribution warehouse in Weert. This process delivers 25%-30% in efficiency savings – or a total of 280 tonnes of CO_2e avoided per year. We will continue to assess our logistics provision to increase efficiency and carbon savings.

ESRS E1: Climate change continued

Targets related to climate change mitigation and adaption

E1-4-30, E1-4-32, E1-4-33, E1-4-34(a-c)

We embrace the opportunity to help reduce emissions and have set ambitious 2030 emissions targets.

We remain focused on our commitment to meeting our stated sustainability objectives across our three strategy pillars of Emissions, Ecology and Social. So far, we have set aggressive targets for 2030 based on our baseline year of 2020, approved by the Sustainability Committee. The SBTi has validated and approved our near-term GHG emissions reduction targets. All data collected and tracked against our targets is third-party verified.

SBTi approved targets to be achieved by 2030:[1]

- Scope 1 and 2 reductions of 42%
- Scope 3 reduction of 12.3%

2030 targets to further support our GHG reduction pathway:

- Renewable energy of 100%
- VOC intensity reduction of 10%

In addition, we have committed to reducing resource consumption as well as limiting our waste generation to support our Ecology pillar:

- Water intensity reduction of 20% by 2030
- Zero waste to landfill by 2025

We track our progress against our targets and publicly report this information annually. We also conduct Sustainability Committee meetings with members of executive management and the Board at least quarterly. In these sessions, we review key sustainability topics, ensuring pragmatic decision making and sustained and measurable improvements in our progress against targets.

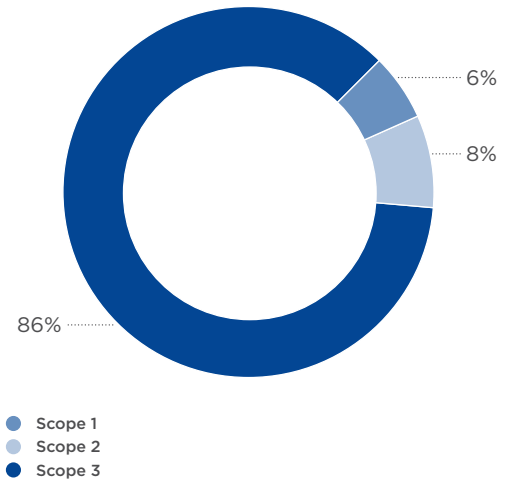
Composition of our emissions

- Scope 1 represents 44% of AMP's total annual absolute Scope 1 and 2 emissions
- Scope 2 accounts for 56% of AMP's total annual absolute Scope 1 and 2 emissions

Note: Scope 1 and Scope 2 make up 6% and 8% respectively of our total GHG emissions inventory. Scope 3 makes up 86% of our total absolute GHG emissions inventory. See pie chart fig. below:

*Scope 2 calculation is market-based

Fig. GHG Emissions 2024



1 Baseline figures for emissions are from 2020.

Our 2024 progress against targets

- **Renewables:** By investing in PPAs, we secured more renewable electricity, increasing the total by 10% in 2024 from 2023 levels to 30% overall. This included a new 46% total for Europe, up from 35% in 2023. In South America the 2024 total was 43%.
- **Scope 1 and 2 reduction vs 2023:** Despite the significant 3% YoY growth of the business, our combined absolute Scopes 1 and 2 decreased 10% from 2023 levels:
  - Scope 1 YoY reduction of 5% since 2023
  - Scope 2 YoY reduction of 14% since 2023
- **Intensity down:** Overall, the business has grown 17% since the 2020 baseline. By the end of 2024, Scopes 1 and 2 had only risen by 2% above 2020 levels.
- **Scope 3:** Our total Scope 3 emissions for 2024 also reduced compared to 2023, and we have exceeded our 2030 target significantly. Our decarbonising focus on reducing material consumption, with innovation in manufacturing and improved recycled content levels also contributed positively.
- **Recycled content:** The proportion of recycled content in our cans is one of the highest in the industry, at 78% in 2024, versus 64% in 2020, according to the public disclosures from peers we have reviewed. To enable more transparent and improved accounting of data, we have been working closely with our trade associations to develop a standard recycled content methodology. We believe this will benefit all beverage can aluminium sheet providers.
- **VOC intensity:** This is on track, with a 9% reduction in 2024 compared to our baseline year of 2020. Led by our Operations teams, technology and process improvements delivered these reductions.

ESRS E1: Climate change continued

Target values for 2030

E1-4-34(d)

To meet our SBTi approved targets (with a potential minimum financial impact), our total Scope 1 and 2 emissions in 2030 would fall to:

- **Scope 1** 183,704 tCO_2e
- **Scope 2** 0 tCO_2e
- **Total** 183,704 tCO_2e

This represents a total reduction of 170,546 tCO_2e from 2024 levels.

Refining our emissions targets

E1-4-34(e)

In 2022, the SBTi approved our 2030 GHG emissions targets and their alignment with the Paris Agreement. The SBTi targets received external assurance and the key metrics for our Emissions and Ecology sustainability strategy pillars also receive annual third-party assurance.[2]

Future developments such as changes in sales volumes, shifts in customer preferences and demand, regulatory factors, and new technologies are difficult to model. Some or all of these could potentially impact both our GHG emissions and emissions' reductions. That said, at AMP we believe that our strategy to focus on the decarbonising levers will continue to make the right level of impact.

We recognise the ambition of the Paris agreement to achieve net zero emissions by 2050 and to formulate realistic medium- and long-term science-based targets for the years beyond 2030. We are working on a decarbonisation plan which will track the intervals aligned to SBTi[1] recommendations and best practice.

We plan to continue to improve operational efficiencies and enhance our power procurement strategy. We will carry on investing pragmatically in lower-carbon technologies. We will also work to raise the amounts of recycled content in our products, partnering with our suppliers to use low carbon aluminium. We will support this work by advocating circularity through our trade association partnerships. We believe this will continue to reduce our own material and energy consumption, as well as helping the wider industry to achieve a lowest-carbon beverage can as standard.

Our decarbonisation levers

E1-4-34(f)

Our emissions profile is as follows:

- Scope 1 – 6% of our total GHG emissions inventory
- Scope 2 – 8% of our total GHG emissions inventory
- Scope 3 – 86% of our total absolute GHG emissions inventory

Our decarbonisation plan employs the following levers:

- Reducing energy usage and driving efficiencies in all our operations
- Investing in low-carbon transport
- Developing alternative low-carbon thermal solutions
- Transitioning to renewable electricity
- Increasing recycled content in aluminium
- Lightweighting and downgauging to reduce material consumption
- Identifying technologies and promoting further low-carbon aluminium sourcing

Scenario modelling and planning assumptions

We have developed our targets using emissions data aligned with the GHG Protocol and internal scenario modelling that consider:

- Regional energy transition pathways
- Recycled content availability
- Business growth projections through 2030 and beyond

Transitioning to renewable electricity

Our ambition is to convert to 100% renewable electricity by 2030, eliminating 8% of our total emissions from electricity consumption – Scope 2.

For more detail, see chart on pg. 20

Increasing recycled content, lightweighting and downgauging

Aluminium, our key raw material, accounts for 91% of our Scope 3 emissions. Our procurement strategy seeks to increase the proportion of recycled content in our products, which avoids 95% of the energy and emissions associated with virgin metal.

In 2024, we achieved a global average of 78% recycled content in our beverage cans. Our procurement strategy seeks to further increase the proportion of recycled content in our products, enabling business growth, and the achievement of our reduction targets.

We also work with partners to innovate with raw materials to optimise our product design within our manufacturing facilities. This enables further reductions in the quantities of metal required in each unit, avoiding more emissions.

1 SBTi suggests targets for 2035, 2040, 2045 and 2050.
2 The Research Institutes of Sweden (RISE) provided limited assurance of the acquisition, processing and aggregation of the quantitative data necessary.

Spotlight:

Recognition for our work with suppliers

We were happy to make CDP's Supplier Engagement Assessment (SEA) A-list for the 2024 disclosure cycle. This accolade recognises our work to collaborate with our suppliers to increase efficiency in their supply chains. Collaboration with our suppliers to help reduce their emissions improves our Scope 3 performance and makes our industry more resilient as the world acts to limit climate change.

Image: AMP-E facility Valdemorillo

ESRS E1: Climate change continued

Energy consumption and mix

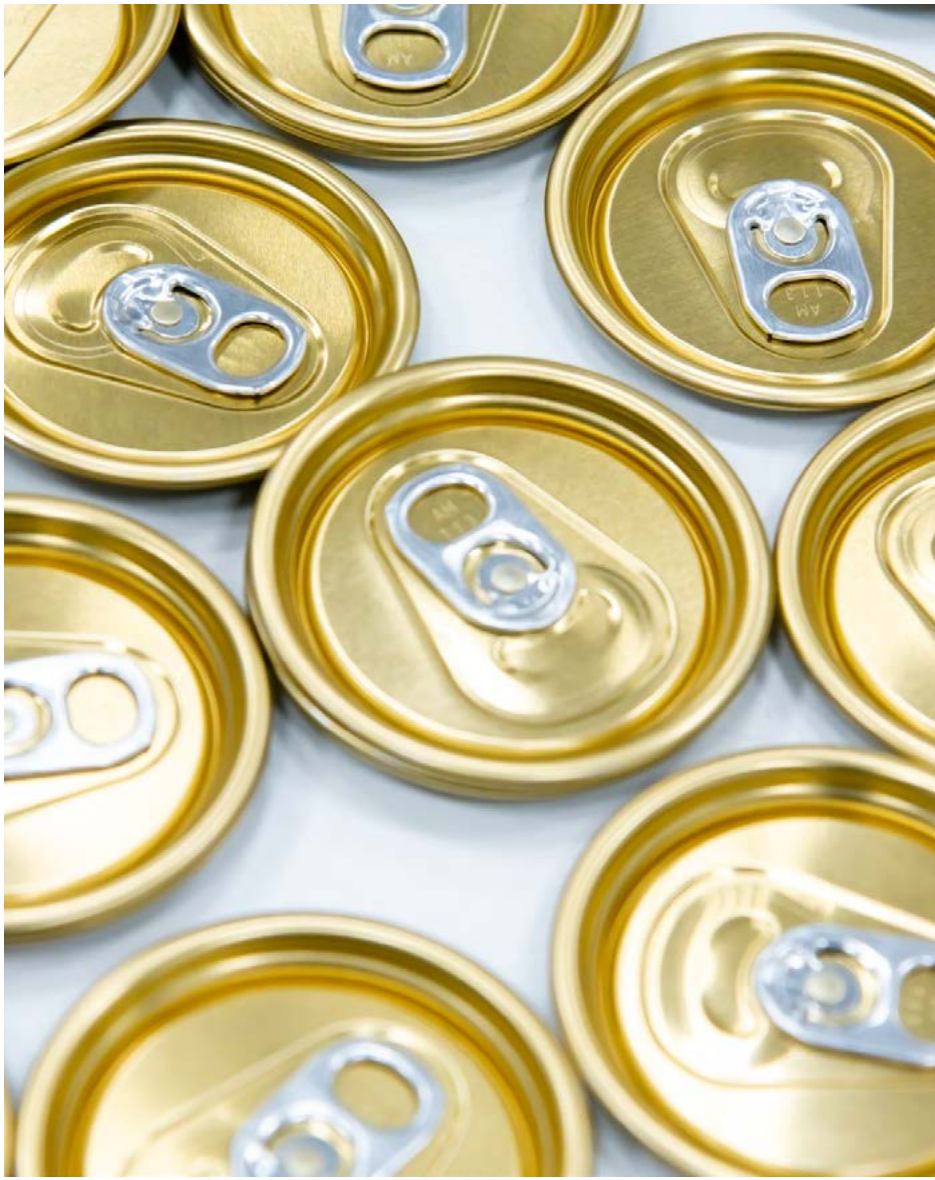
E1-5-(37-40)

Energy consumption	Unit	2023	2024
Fossil energy consumption			
Share of fossil sources in total energy consumption	%	89%	84%
Fuel consumption from crude oil and petroleum products	MWh	6,798	4,012
Fuel consumption from natural gas (incl. LNG)	MWh	809,068	775,441
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources[1]	MWh	738,040	636,152
Renewable energy consumption			
Share of renewable sources in total energy consumption	%	11%	16%
Fuel consumption from renewable sources	MWh	–	–
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources[2]	MWh	185,730	269,874
Consumption of self-generated non-fuel energy	MWh	40	1,762
Share of renewable sources in electricity consumption	%	20%	30%
Total energy consumption	MWh	1,739,675	1,687,241

1 Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources is a mix of all sources.
2 Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources includes fully renewable facilities only.

Energy intensity	Unit	2023	2024
Total energy consumption from activities in high climate impact sectors per net revenue from activities high climate impact sectors	MWh/mio$	362	344
Total energy consumption from activities in high climate impact sectors per 1,000 units of finished goods (pieces[3]) from activities high climate impact sectors	kWh/1,000 pcs	37	35

3 Includes data only for can body plants (4 can end plants + 1 hybrid plant excluded). Huron plant (hybrid) data omitted because of combined reporting for cans and ends (will be included in 2026 when separated 2025 data for cans and ends is available).



ESRS E1: Climate change continued

Gross Scopes 1, 2, 3 and total GHG emissions

E1-6-44, E1-6-48, E1-6-49, E1-6-50, E1-6-51, E1-6-53

Breakdown of GHG emissions	Unit	2023	2024
Scope 1 GHG emissions			
Gross Scope 1 GHG emissions	$mtCO_2e$	165,020	157,506
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	n/a	n/a
Scope 2 GHG emissions			
Gross location-based Scope 2 GHG emissions	$mtCO_2e$	289,309	254,275
Gross market-based Scope 2 GHG emissions	$mtCO_2e$	229,138	196,744
Scope 3 GHG emissions			
Total Gross (indirect) Scope 3 GHG emissions	$mtCO_2e$	2,474,926	2,132,911
1. Purchased goods and services	$mtCO_2e$	2,195,701	1,931,416
2. Fuel and energy related activities	$mtCO_2e$	73,684	93,202
3. Upstream transportation and distribution	$mtCO_2e$	198,001	97,839
4. Waste generated in operations	$mtCO_2e$	7,540	10,455
Total GHG emissions			
Total GHG emissions derived from location-based method	$mtCO_2e$	2,929,255	2,544,692
Total GHG emissions derived from market-based method	$mtCO_2e$	2,869,084	2,487,161

ESRS E1: Climate change continued

Fig. AMP Scope 1 and 2 decarbonisation progress

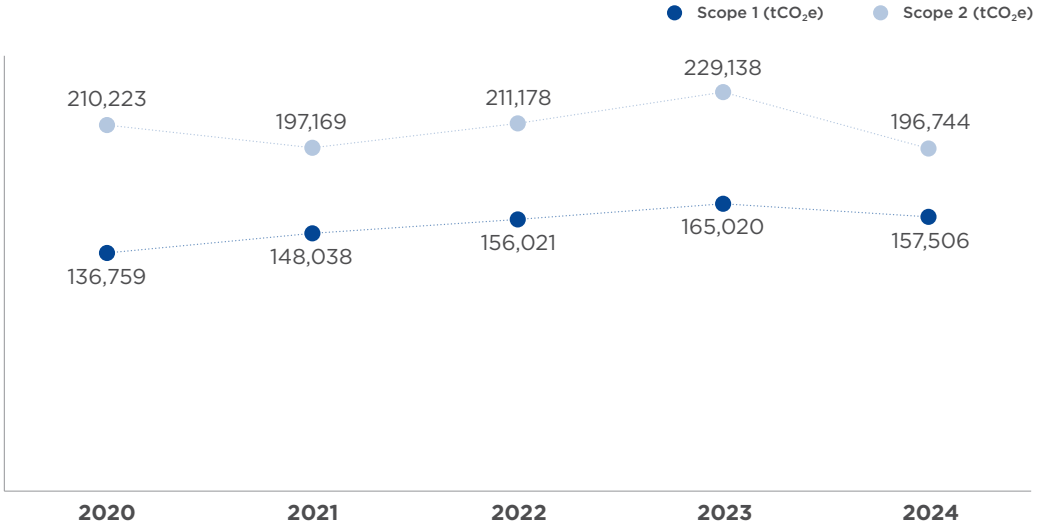
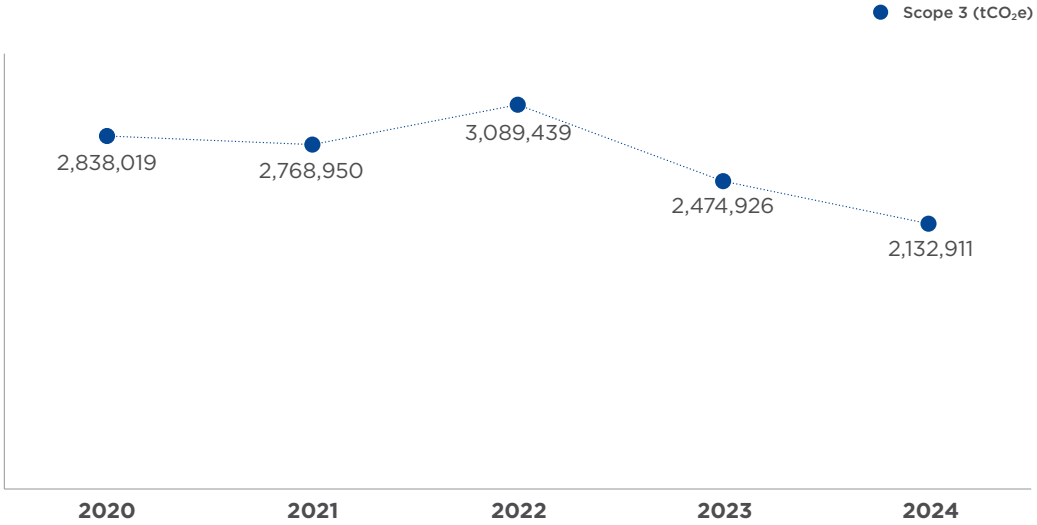


Fig. AMP Scope 3 decarbonisation progress



GHG intensity based on net revenue

E1-6-54

	Unit	2023	2024
Total GHG Emissions intensity on net revenue			
Total GHG emissions intensity, location-based	$mtCO_2e$/mio$	609	518
Total GHG emissions intensity, market-based	$mtCO_2e$/mio$	596	507

GHG intensity based on production

E1-6-54

	Unit	2023	2024
GHG Emissions intensity on 1000 pieces			
Total GHG emissions intensity of can body[1], location-based	$kgCO_2e$/1000 pcs	46.6	38.6
Total GHG emissions intensity of can body[1], market-based	$kgCO_2e$/1000 pcs	45.1	37.1

1 Includes data only for can body plants (4 can end plants + 1 hybrid plant excluded). Huron plant (hybrid) data omitted because of combined reporting for cans and ends (will be included in 2026 when separated 2025 data for cans and ends is available).

ESRS E1: Climate change continued

Delivering consistent environmental management standards

E1-6

In August 2024, AMP achieved International Organization for Standardization (ISO) 14001 certification for an environmental management system (EMS) at all our production facilities. ISO 14001 is an internationally recognised standard that provides companies with a framework to help monitor and control their environmental performance through efficient resource management and waste reduction.

Internal carbon pricing

E1-8-63(a)

AMP has developed an internal capital expenditure allocation process for all sustainability projects that is integrated in the annual budget approval processes across each regional operation. Each region receives a budget allocation and approval for projects that deliver a return on investment (ROI) based on tonnes of CO_2e emissions eliminated or avoided.

AMP is not currently subject to any carbon trading scheme. However, our climate scenario analysis did identify carbon pricing as a future potential risk from emerging regulations. In that modelling, we estimated the following, based on the mass of the aluminium we procured at the time:

- CO_2e emissions for aluminium with a 78% recycled content = 1,931,416 tCO_2e
- Estimated CO_2e emissions for aluminium using an average recycling rate as a proxy for recycled content at 47%[1] = 3.2 million tCO_2e
- The difference between 78% recycled content and 47% (industry level) recycled content is equivalent to 1.28million tCO_2e (3.2 million tCO_2e-1.9 million tCO_2e) = 1.27million tCO_2e.

Implications: By using aluminium with more recycled content, we can build resilience against emerging regulations such as the Carbon Border Adjustment Mechanism (CBAM). We believe this opportunity can significantly reduce our exposure to such potential costs.

1 Source: https://www.aluminum.org/sites/default/files/2024-12/FINAL-2024_Aluminum-Can-KPI-Report.pdf

Spotlight:

AMP-Europe driving renewable progress with a new vPPA in Portugal

AMP-Europe continues to accelerate its transition to renewable electricity through a new virtual Power Purchase Agreement (vPPA) signed with BNZ in Portugal. Starting in 2026, this 12-year agreement will secure 146 GWh per year of renewable electricity certificates – expected to offset around 36% of AMP-Europe's total electricity consumption across the continent.

This marks the second major renewable energy agreement for AMP-Europe in 2024, following a solar vPPA in Germany secured earlier in the year. Together, these projects represent significant progress toward AMP-Europe's goal of sourcing 100% of its electricity from renewable sources by 2030.

The project was supported by Schneider Electric, a leading adviser in renewable energy procurement and carbon management, who guided AMP-Europe through project selection and negotiations. Our collaboration with partners like BNZ and Schneider Electric reflects shared values and a joint commitment to accelerating a clean energy transition. It is also a major step towards our CO_2 reduction and renewable electricity goals.

Image: Aerial shot of solar field

ESRS E2: Pollution

Introduction

At AMP we are actively engaged in prevention measures relating to the pollution of air, water, and soil resources. Each manufacturing facility has received ISO 14001 certification for environmental management and assesses itself against the Ardagh Group BGreen7 standards. These aim to respond to environmental risks, prevent incidents and avoid impacts.

Pollution impacts, risks and opportunities table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Pollution of air								
Aluminium converting processes such as printing and lacquer application create emissions.	Negative impact	Controlling air emissions through a combination of good operational practices – such as burner optimisation, investing in cleaner technologies and preventive maintenance – emissions abatement technologies (e.g. VOC capture control systems) and full compliance with local air permitting requirements.		●				●
Using renewable energy sources can reduce the combustion of fossil fuels, decreasing air pollutants.	Positive impact	Setting a 2030 goal of 100% renewable energy. Currently achieved 30%.		●			●	
Adoption of energy-efficient equipment and techniques can lower the emissions from Ardagh's manufacturing activities.	Positive impact	Evaluating and testing step-change projects for roll-out across our facilities to reduce our scope 1 and 2 emissions. We remain committed to long-term investment that supports enduring operational improvements.	●	●	●			●
High energy intensity in suppliers' mining process contributing to air pollution.	Negative impact	Stipulating, in our Responsible Procurement Policy, that our suppliers must understand their organisational environmental footprint and establish a program for the prevention of pollution: e.g. CO_2 emissions.	●					●

ESRS E2: Pollution continued

Pollution impacts, risks and opportunities table continued

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Pollution of water								
Water used in the manufacturing process can become contaminated with chemicals and heavy metals, contributing to water pollution if untreated.	Negative impact	Controlling water pollution through on-site pre-treatment, discharge to municipal systems, or third-party treatment, depending on facility needs. These measures control pollutants like heavy metals, oils, and nutrients, and are governed by BGreen7 standards and local permit requirements.		●			●	
Encouraging water recycling and conservation within manufacturing processes can minimise water wastage and pollution.	Positive impact	Implementing internal closed-loop water systems as a key practice to reduce water consumption and minimise pollution whenever feasible.		●			●	
Water scarcity may be accelerated by pollution, leading to increased costs and conflicts over water resources.	Risk	Assessing water stress using the WRI Aqueduct Water Risk Atlas to identify and benchmark facilities in high-risk regions, prioritising them for water efficiency investments where needed. To help protect water quality and prevent pollution-related scarcity, we conduct regular equipment checks (e.g. oil-water separators and wastewater controls) and, in some regions, implement Contingency, Emergency, and Spill Prevention Plans to address wastewater incidents.	●					●
Enhancing sustainable water management practices can improve the company's environmental footprint.	Opportunity	Setting 2030 water intensity reduction target of 20%. In addition, our internal environmental management system standards include limits on wastewater pollutants, which apply where local regulations or permits do not set stricter thresholds		●				●
Pollution of soil (and respective loads)								
Extraction activities may result in the release of heavy metals and pollutants into the soil (via by-products and wastewaters).	Negative impact	Seeking to minimise upstream environmental impacts by working with suppliers to improve responsible sourcing practices and by increasing recycled content in our packaging. Reducing reliance on virgin raw materials helps lower the risk of pollution from extraction-related activities.	●				●	
Soil pollution can impact future land use and cause regulatory complications and sanctions.	Risk	Engaging suppliers through responsible sourcing expectations to help minimise environmental risks – such as soil pollution – associated with raw material extraction and processing. By increasing recycled content, we reduce our reliance on virgin raw materials, helping to limit the land use and contamination risks tied to extractive activities across our value chain.	●		●		●	

ESRS E2: Pollution continued

Pollution of air

E2-4-28(a)

AMP pollution to air	Unit	2023	2024
VOC	Kg	2,655,638	2,733,461

Site screening

ESRS 2 IRO-1-11(a)

AMP operates key processes to identify pollution-related IROs in both our operations, and our upstream and downstream value chain.

We use emissions reduction systems including combustion optimisation equipment, electrostatic precipitators and selective catalytic reduction technologies. AMP employees are actively engaged in implementing our pollution prevention measures related to air, water and soil. Their experience and knowledge ensure our approach to pollution prevention and control directly relates to operational realities, contributing to more effective and locally grounded environmental performance.

Our approach includes:

- Monitoring emissions and regular equipment checks on systems such as oil-water separators and wastewater controls
- Reporting environmental incidents and performing incident investigations using the Ardagh Group Risk Management System (ARMS), sharing learnings as pro-active measures across facilities and regions
- Periodic self-assessments against BGreen7 standards, our environmental management framework
- Site-level audits, inspections and environmental procedure reviews
- Data collection and operational reviews related to permitting requirements, such as air dispersion modelling to track effluent discharges
- Evolving environmental practices through structured safety or improvement programmes
- Developing and testing Contingency, Emergency and Spill Prevention Plans to address issues such as spill drills, air release scenarios and wastewater incidents

Community consultation

ESRS 2 IRO-1-11(b)

In line with the ISO 14001 certification, all manufacturing facilities evaluate the needs and expectations of interested parties and stakeholders. This includes the interests of the communities around our locations. These evaluations, together with the environmental aspects and impacts analyses, determine information exchange with local communities.

Policies to control pollution

E2-1-14, 15

In March 2024, we published our revised Environmental Policy. This sets out the AMP's responsibility to natural resources, with a commitment to continuous improvement in industrial performance.

The objectives of the Policy are to:

- Ensure material compliance with environmental and operational licences, environmental regulations, internal control standards and other requirements
- Limit incidents with environmental impacts
- Minimise the impacts of our operations on the environment
- Ensure good environmental practices and continuous improvement through environmental management systems in our factories

Our Responsible Procurement Policy sets out the expectation that upstream of our value chain there is:

- Adherence to legal requirements
- Completion of an environmental risk assessment, at a minimum annually
- An established programme for the prevention of pollution, e.g. water use, CO_2 emissions
- Sustainable use of resources including use of recycled content
- Appropriate collection and disposal of waste that must be managed with authorised service providers
- Requirement to manage all chemicals responsibly, including: controlling exposure of humans and the environment to hazardous chemicals; eliminating carcinogenic, mutagenic or toxic for reproduction substances (CMR substances) and EU/UK substances of Very High Concern delivered to AMP; and ensuring products are registered and approved with EU REACH and other legal requirements
- Periodic environmental assessments carried out in our plants to evaluate environmental impacts, risks and opportunities

Our policies and procedures around the prevention of, or correction to the risk of pollution, emergency preparedness and response procedures align to ISO 140001. Within the ISO 14001 Standard, any environmental risk of significant impact requires an operational control procedure to control the risk and establish robust control measures to mitigate and reduce pollution.

We have implemented structured Environmental Control Standards (ECSs) built upon four pillars: ISO 14001 certification; BGreen7; incident root cause analysis; and action planning with capital expenditures and operational expenditures integration. Under our BGreen7 environmental management framework, we have established minimum policy requirements and proactive controls across five key impact areas, including air emissions, soil contamination, water consumption and wastewater discharge. Our framework encourages site-level participation in environmental risk assessments, operational controls and incident response activities, to help reduce pollution and our impact on the environment.

ESRS E2: Pollution continued

Actions and resources related to pollution

E2-2-18; E2-2-19(a-c)

We have assessed our pollution risks and put place measures to avoid and reduce impacts on all natural resources.

Reducing impacts on natural resources

Compliance with regulatory requirements is non-negotiable at AMP. In 2024, we rolled out the BGreen7 standards. These focus on implementing a solid foundation that aims to prevent environmental incidents. The standards encourage active management and seek to make environmental responsibilities relevant to all levels of the company hierarchy.

BGreen7 mandates that every manufacturing facility completes a self-assessment. This discloses how the facility controls and mitigates negative impacts, including detail on the application of environmental controls. The standards target the significant environmental impacts of our manufacturing processes, including pollution to air, soil and wastewater.

BGreen7 follows the ISO 14001's underlying approach of identifying risks and opportunities and defining the requirements that aim to reduce pollution risks. The standards also demonstrate good practice of day-to-day management of environmental processes.

For air pollution, we focus on controlling airborne emissions, preventing the release of Legionella and phasing out the use of fluorinated gases and ozone-depleting substances. We also seek to manage noise impacts on neighbouring communities and natural surroundings.

Our manufacturing processes have a limited direct impact on soil, particularly in terms of agricultural land use, excavation, or the deposition of materials onto natural soil. Any potential soil pollution is primarily indirect, resulting from airborne emissions that settle on the ground, water use that leads to wastewater discharge and the generation of waste.

We address soil pollution through compliance-based measures, including Spill Prevention Plans, secondary containment systems and site-level adherence to BGreen7 protocols. Spill Response Plans address identified concerns. Our BGreen7 Standards include bunded containment for tanks, double-walled piping, monthly inspections, emergency spill protocols and waste area containment to prevent ground contact. Together, these initiatives constitute our policy-based approach to soil pollution mitigation.

We aim to reduce our water use and preserve this resource for water-stressed areas. In reducing the volumes of water used, we strive to evaluate and consider pollution that enters the water streams we control. Our BGreen7 standards include a mandatory list of pollutants to be measured, covering areas with less strict water-related regulations or permits. For facilities based in Europe, all facilities report the parameters as demanded by the regulations on the European Pollutant Release and Transfer Register (E-PRTR). We operate internal closed-loop water systems to reduce water consumption and minimise water pollution.

Our facilities track their water use, with efforts underway to enhance daily monitoring practices and to mandate immediate leakage checks when abnormal consumption is identified. Pollution prevention measures include separating stormwater from sanitary sewers and emergency spill response protocols. We also monitor emissions to water from our industrial processes and implement controls to ensure compliance with regulatory discharge limits. Pollutants and parameters monitored include absorbable organic halogens (AOX), fluoride, heavy metals, hydrocarbons, chemical oxygen demand (COD), pH and total suspended solids (TSS).

For more detail, see Site screening (pg. 30)

Wastewater from manufacturing processes is treated on-site where applicable, then discharged in accordance with local regulations. Wastewater discharges, including from production and sanitary sources, are analysed across all facilities. In the absence of local regulations or less strict regulatory requirements, we have started to apply our own internal pollutant thresholds as outlined in the BGreen7 Wastewater Standard. We formally document all incidents and learnings, to share with our network of facilities.

Emergency preparedness

To mitigate the impacts of events, our locations assess and document their emergency response procedures. These include spill drills, severe weather responses, and mock air emissions releases. All employees receive relevant training.

We have formal emergency preparedness and response procedures in place, aligning to ISO 14001. Included in the plants' Emergency Response Plans (ERP) or Emergency Preparedness Plans (EPP), these include direction on the organisation, communication and actions to be followed in the event of an environmental accident or emergency.

When spills or discharges occur, we use dedicated professionals to evaluate and plan for successful containment and remediation. We work in close cooperation with local authorities and have equipment and resources as part of our standard operating procedures. We formally document all incidents and learnings, to be shared with our network of facilities.

Reducing pollution through how we use materials

Our programmes, actions and improvement programmes follow the waste hierarchy of avoiding, reducing and re-using materials to manage and mitigate environmental impacts.

Our facilities follow local legislation and permitting limits for all potential pollutants. The Standard Operation Procedure (SOP) Chemical Substance Management and BGreen7 standard – covering ozone-depleting substances or fluorinated substances – describe how to phase out critical substances according to regulations and preclude the introduction of these substances. The substances defined as 'substances of very high concern' (SVHC) by the EU are forbidden and need to be phased out by all facilities. Products containing SVHC or similar in other countries – e.g. the United States – are not allowed to be introduced. Carcinogenic, mutagenic and reprotoxic substances in declared products are forbidden to be introduced as well.

Our priority is to comply with all legal regulations. The Ardagh Group zero waste to landfill guidance contains our mitigation hierarchy for land pollution. We first control and minimise our impacts through our ECSs, see Policies to control pollution. We also align with local air, water and waste permit conditions to manage impacts of the risk level of pollution. Deviations to these requirements are captured and addressed in ARMS incident reporting. Our typical pollutants include VOCs, which we aim to reduce through technology upgrades and supplier engagement on lower-emissions materials.

For more detail, see Policies to control pollution (pg. 30)

ESRS E2: Pollution continued

Pollution targets

E2-3-23(a-b)

The AMP pollution-related targets are central to our sustainability strategy, guided by ISO 14001 standards and our BGreen7 environmental management framework.

While we have no formal stakeholder engagement process specific to pollution target-setting, our pollution targets reflect the input and operational insight of senior leaders across AMP's global manufacturing footprint. The AMP Board-level Sustainability Committee approves AMP's sustainability targets, which align with our Environmental Policy. They complement mandatory environmental controls established through site-specific air, water and waste permits.

The targets:

- **VOCs:** Reduce emissions intensity by 10% by 2030, from a 2020 baseline
- **Waste to landfill:** Achieve ZWTL status by 2025 for AMP manufacturing facilities
- **Water:** Our BGreen7 standards include internal levels of wastewater pollutants where stricter levels defined by regulations or permits are not present

The above targets apply to all AMP-owned manufacturing facilities but do not extend to upstream or downstream value chain activities. Additional detail, including actions and commitments, is explored in the further sections of this report, see below:

For more detail, see Climate change (pg. 16)

For more detail, see Water and marine resources (pg. 33)

For more detail, see Resource use and circular economy (pg. 41)

Internal governance documents contain all water-related commitments procedures and mandatory standards. AMP's current objective is to ensure continuous compliance with all applicable water discharge regulations across our operations, while progressively reducing discharge volumes and improving water quality through engineering controls and operational best practices. Our water pollution target is under review as we strengthen our water stewardship and discharge management practices.

For more detail, see Water and marine resources (pg. 33)

Methodology and assumptions

We define pollution KPIs on an intensity basis, measured as emissions or waste per 1,000 units of finished can bodies and per net revenue. We calculate performance using verified internal platforms and protocols, including Tagetik, ARMS and ISO 14001-aligned data collection methodologies.

Key assumptions include:

- A 2020 baseline year
- Continuous improvement through equipment upgrades and process optimisation, including combustion efficiency and abatement system performance
- Stable production volumes and operating scale across core product lines

We review progress periodically and integrate outcomes into our broader sustainability governance and performance management processes.

Reporting on performance

E2-4-30(a-c)

All facilities report environmental data in an AMP-wide document provided by the Sustainability team, ensuring a consistent approach to data calculation and enabling meaningful comparisons across facilities and regions.

Our BGreen7 standard on wastewater and rainwater pollutants defines a mandatory list of pollutants to be measured in the absence of more strict regulatory demands or obligations by permits. This includes typical parameters such as COD and suspended solids.

All facilities located in Europe report emissions and transfers of pollutants in compliance with the requirements of the E-PRTR, as implemented under national regulatory frameworks. We measure and report VOCs using the same approach. We include the emissions in our ARMS and Tagetik reporting systems as absolute values and intensities.

Although local norms and regulations may vary across the countries where we operate, we employ certified consultants to consistently sample and assess potential pollutants. To maintain accuracy and comparability, our reporting system includes standardised calculations, such as conversions between metric and imperial units.

Our Environmental Data Handbook outlines how to report emissions data. To make data comparable across regions and facilities, the units used in the reports are re-calculated in standardised units, with external assurance. The Handbook covers production, waste management, water, energy and air emissions, and describes reported information, applicable formulas, calculation factors and source types.

ESRS E3: Water and marine resources

Introduction

The acceleration of climate change is putting pressure on limited supplies of fresh water, making this a priority topic for ecosystems, communities, our customers and the future of the business. Achieving excellence in water management is a key focus for the Ecology pillar of AMP's sustainability strategy.

Water and marine resources IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Water consumption								
Manufacturing processes, such as cooling and cleaning, may consume large volumes of water, potentially causing local water scarcity.	Negative impact	Setting a water intensity reduction target of 20%.		●				●
Increasing water scarcity due to climate change may increase operation costs or limit production capacities.	Risk	Assessing water stress using the WRI Aqueduct Water Risk Atlas to identify and benchmark facilities in high-risk regions, prioritising them for water efficiency investments where needed. We continue to explore closed-loop water systems as a key practice to reduce water consumption.		●	●			●
Implementing efficient water management strategies and technologies can lead to significant water savings in the manufacturing process.	Positive impact	Aiming to further invest in water efficiency projects, including measuring, recycling and optimising water usage.		●			●	
Water withdrawals								
High volume of water withdrawal from groundwater for operations can lead to falling water tables and water scarcity.	Negative impact	Addressing water-related risks in our value chain through our sustainable procurement practices, which include expectations around responsible resource use. Our supplier standards encourage transparency and mitigation of environmental impacts, including groundwater withdrawal, to help reduce pressure on local water resources and avoid contributing to scarcity.	●					●
Developing a comprehensive water management strategy focusing on the water recycling and engagement in community water stewardship initiatives can add value to business operations and enhance stakeholder relationships.	Opportunity	Implementing and maintaining an environmental management system in accordance with the ISO 14001 standard by ensuring the continual improvement of our plants.		●				●
Over-reliance on local water sources for operations can put pressure on community water supplies.	Negative impact	Aiming to further invest in water efficiency projects, including measuring, recycling and optimising water usage.	●	●	●		●	

ESRS E3: Water and marine resources continued

Water and marine resources IRO table continued

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Water discharges								
Untreated water discharges can lead to severe penalties or operations suspension due to regulatory non-compliance resulting in business loss.	Risk	Managing water discharge risks across our operations through BGreen7 environmental programme, which require compliance with local discharge permits and set internal expectations for controlling key pollutants such as heavy metals, oils, and nutrients. In our value chain, we promote responsible water management through our sustainable procurement practices, encouraging suppliers to prevent untreated discharges and comply with relevant environmental regulations.	●	●	●	●		
Regular water quality and/or effluent testing can ensure discharged water is within acceptable parameters, reducing pollution risks.	Positive impact	Conducting regular water quality and effluent testing in line with permit requirements and internal expectations. These practices are governed by our BGreen7 environmental programme, which defines minimum standards documentation.		●		●		
Improvements in waste management and water use within production facilities can lead to lower waste generation, reducing the volume of discharge into local bodies.	Opportunity	Aiming to further invest in water efficiency projects, including measuring, recycling and optimising water usage.	●				●	

ESRS E3: Water and marine resources continued

Our approach to water governance and policies

E3-1-11, E3-1-12(a), E3-1-13, E3-4-28(e)

We source from ground, surface and municipal supplies and use water in the forming, washing, rinsing and cooling stages of the can making process. Water is also a key component in the value chain of beverage packaging – from the manufacturing of aluminium to the production of the various beverages made by our customers.

Water stewardship is a key focus under the Ecology pillar of our sustainability strategy. As water is essential to our manufacturing processes – from forming and cooling to rinsing and washing – we recognise its value, not only in our operations but also across the full beverage packaging value chain.

We manage water-related impacts, risks and opportunities through a structured environmental governance framework. This includes ISO 14001-certified Environmental Management Systems, the internally developed BGreen7 programme, ARMS for environmental data tracking and risk mitigation. Together, these systems provide standardised guidance for water sourcing, consumption, discharge, reuse and pollution prevention across all facilities.

BGreen7, implemented in 2024, establishes minimum environmental requirements applicable at all our facilities. Periodic self-assessments reinforce these requirements and facilities are expected to ensure effective implementation. BGreen7 includes specific water management standards covering withdrawal monitoring, quality control – via on-site or third-party treatment – and discharge compliance. These practices are embedded in facility-level operations, regardless of local water stress status.

We track monthly water consumption and discharges, historically through ARMS, using data from smart meters, supplier invoices and facility-level registers. All facilities maintain regulatory permits and documentation related to wastewater discharge and treatment. To support enhanced data quality, consistency and ESG reporting, all environmental data has transitioned to Tagetik. This enterprise platform will strengthen sustainability reporting and streamline performance tracking across our organisation. The Environmental Data Reporting Handbook continues to define key indicators that aim to maintain standardisation during and after the transition.

To identify areas of heightened water-related risk, we use the WRI Aqueduct Water Risk Atlas methodology. As of the reporting period, seven AMP facilities are located in regions of high or extremely high-water stress. While the BGreen7 programme provides a unified sustainability framework across all manufacturing facilities, facility-specific policies are not currently in place. The need for such localised governance is under review as part of the ongoing development of our water stewardship strategy.

Water use, design and water-stressed areas

E3-1-12(a-c)

We manage water use, discharge and related risks through a structured, facility-level approach anchored by ISO 14001-certified environmental management systems and the BGreen7 programme. These systems guide operational practices on water sourcing, treatment, reuse and pollution control, while enabling transparency and performance monitoring.

We withdraw water from municipal sources, groundwater, surface water, and, in select cases, harvested rainwater. All withdrawals are metered and regulated under local permits. To reduce dependency on freshwater, we strive to use closed-loop systems and rainwater reuse.

Used process water is treated on-site or pre-treated before discharge to municipal treatment facilities or shipped for treatment. Wastewater quality is monitored regularly for parameters such as adsorbable organic halogens (AOX), COD, heavy metals, hydrocarbons and total suspended solids (TSS). In addition, rainwater from high-risk areas – such as rooftops and bulk material storage zones – is analysed every two years. Infrastructure and procedures are in place to prevent pollution – including the separation of rainwater and wastewater flows, emergency spill response protocols and the inspection and maintenance of sewer and containment systems. These measures reflect the minimum requirements established by BGreen7.

Product and manufacturing design also reflect water-related considerations. Efficiency initiatives such as continuous process optimisation for beverage cans help lower water intensity in operations. While we do not offer water or marine-related services, we believe pollution prevention practices support ecosystem protection by minimising contaminants in runoff and wastewater.

Assessing risks

ESRS 2 IRO-1, E3-8(a)

To identify and assess production facilities at high risk of water stress we use the WRI Aqueduct Water Risk Atlas methodology.

AMP operates 23 production facilities across 9 countries, all of which are included in the WRI Aqueduct assessment. In 2024, we evaluated all production facilities worldwide by location and address. Six out of the 23 production facilities were rated as 'high' risk, and one rated as 'extremely high' according to the WRI Aqueduct Water stress indicator.

Reducing water use in our operations

E3-2-17, 19

Water is a finite and essential resource, and we are committed to reducing usage across our operations.

In 2024, our capital expenditure on water efficiency projects included water meters, recirculation and washer improvements. To ensure the continual improvement of our facilities, we implement and maintain an environmental management system in accordance with the ISO 14001 standard. The Ardagh Group Risk team defines and develops corporate expectations and control standards. To ensure adherence to our Environmental Policy, we maintain appropriate assurance controls, including regular compliance checks and annual management reviews.

We have identified water scarcity as a growing concern. Our strategy to mitigate against this is to implement water efficiencies and benchmark water usage across our facilities and apply best practices across our operations, with added focus on production facilities located in areas of high-water stress. We take a proactive approach to managing water-related risks by identifying current and future water stress in the regions where we operate, using tools such as the WRI Aqueduct Water Risk Atlas. Regular monitoring helps us to anticipate climate-related challenges and strengthen our adaptive capacity.

For more detail, the Spotlight story (pg. 36)

Spotlight:

AMP: Investing in plant water efficiency

Our Valdemorillo facility in Spain has a 'high' water risk rating under the WRI Aqueduct Water Risk Atlas methodology. To address this, we have implemented an active system upgrade that optimises and controls washer overflow, significantly reducing water usage. The initiative uses an advanced real-time monitoring system to control the flow according to chemical triggers. This helps to minimise losses, and associated discharges, increasing water efficiency. In addition, we have carried out projects to replace auxiliary cooling equipment.

Together, investments of $340,000 for these upgrades resulted in 2024 water savings of 30% from our baseline 2020 levels and have achieved one of the lowest water intensity levels across all our can body manufacturing facilities.

In the United States, at our AMP production facility in Fairfield, California, we replaced 50% of the lawn with water-conserving landscaping. This initiative will save approximately 6,435 m^3 of water annually.

At our Chicago AMP manufacturing facility, rated 'high' under the WRI Aqueduct Water Risk Atlas methodology, we made significant investments of $4.2M, replacing an older washer with new technology during 2024. The upgraded system captures and recycles rinse water, avoiding significant consumption. We also replaced a steam boiler with a closed-loop hot water system and implemented a stack heat exchange unit to capture condensate from the washer. Together, these investments helped to reduce the 2024 water intensity for the plant by 21% compared to 2023.

Image: Valdemorillo counterflow system

ESRS E3: Water and marine resources continued

Meeting our water intensity target

E3-3-22, E3-3-23(c)

Water intensity remains a key focus area for AMP, and we continue to invest in facility-level improvements to support long-term water stewardship.

We have set a 2030 water intensity reduction target of 20%. The target applies globally, regardless of water stress classification. By the end of 2024, we had achieved a 6% reduction, keeping us on track towards our goal. To guide implementation, we benchmark water use at the facility level. We prioritise capital investment in efficiency, recycling and reuse technologies for facilities located in water-stressed areas.

In 2024, CDP awarded AMP an environmental management score for sustainability performance, including a ranking of B for water management. This means we are among the highest-rated companies in all industries scored by CDP. Our assessments include measuring and analysing our incoming and outgoing water, as well as overall resource utilisation. An external third-party verification process validates our water withdrawal and discharge performance.

For more detail, see the Spotlight story (pg. 36)

Disclosing our performance

E3-3-23(a), E3-3-2

AMP is committed to transparency and accountability in our sustainability efforts. We recognise the importance of disclosing how our voluntary targets contribute to improving water quality. Our annual sustainability report includes detailed information on our progress towards these targets. We report on the measures we have implemented to enhance water conservation and sustainable use, such as investments in water efficiency, recycling, and reusing water. We believe these initiatives help us to achieve our water intensity reduction goals and contribute to the overall improvement of water quality in our operations.

Water withdrawal, consumption and intensity

E3-4-28(a-d), E3-4-29

AMP	2023	2024[2]
Total water consumption (m^3)	338,191	353,151
Total water consumption (m^3) vs revenue ($)	70	72
Withdrawals from water-stressed locations (m^3)[1]	1,333,403	1,343,316

1 Stress locations are defined as high and very high risk location according to WRI Aqueduct Water Risk Atlas criteria baseline water stress, as required by CDP.
2 New WRI Aqueduct Water Risk Atlas results for classification available.

Water withdrawals from areas of water stress rose slightly in 2024 by 0.74% vs 2023. This was due to business growth as well as an increase in the amount of land where we operate deemed 'water stressed' in 2024. We continue to monitor and implement efficiency projects to improve our water intensity.

ESRS E4: Biodiversity and ecosystems

Biodiversity is an increasingly important consideration in understanding the broader environmental impacts of industrial activity. As part of our sustainability journey, we are beginning to explore how our operations intersect with biodiversity and how we can support nature-positive outcomes over time. As we advance our understanding of this topic, we will consider ways to integrate mitigating actions for our biodiversity impacts into our decarbonisation roadmaps.

For more detail on our decarbonisation roadmaps, see Climate change (pg. 16)

Biodiversity and ecosystems IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Direct drivers of biodiversity loss – Climate change								
Manufacturing's direct operations and supply chain can produce high levels of GHG emissions, resulting in direct and adverse effects on biodiversity.	Negative impact	Developing and applying a structured decarbonisation roadmap designed to reduce emissions across Scopes 1, 2 and 3 and addressing all of our operations. AMP is fully committed to reducing Scope 1 and 2 GHG emissions in line with limiting of global warming to 1.5°C and reducing Scope 3 emissions targets in line with limiting of global warming to 2.0°C.	●	●	●			●
Implementing energy-saving measures and targets such as achieving 100% renewable energy by 2030 can mitigate climate change impacts and indirect impacts on biodiversity loss.	Opportunity	Investing in our electricity procurement strategy by securing Power Purchase Agreements, renewable energy contracts and certificates to further reduce reliance on fossil fuels and achieve our target of 100% renewable energy by 2030.		●			●	
Direct drivers of biodiversity loss – Land-use change, fresh water-use change and sea-use change								
Land or sea-use changes – such as those related to bauxite – can cause long-term environmental harm and reputational damage. Extraction, processing and mining activities within the supply chain may directly contribute to biodiversity loss.	Risk	Currently investigating this topic to better inform how we manage this risk. At this stage we have conducted an IBAT assessment and identified facilities that are priority facilities for further investigation. In the short term, we are developing our strategies and position.	●					●
Direct drivers of biodiversity loss – Pollution								
Manufacturing activities may generate waste and hazardous byproducts that, if not managed effectively, could harm biodiversity.	Negative impact	Setting a 2025 zero waste to landfill goal. To achieve this goal we aim to minimise waste in all of our operational processes, adopting a reuse and recycle approach wherever possible and limit waste-to-energy incineration.	●	●				●
Robust environmental management systems, adherence to local legislative guidelines and application of best practice in waste, water and air pollution management all help to mitigate harmful impacts on biodiversity.	Positive impact	Achieving ISO 14001 certification at all our plants as well as by adopting an internal environmental management system that goes beyond local and federal regulation.	●	●				●
Impacts on the extent and condition of ecosystems – Land degradation								
Extraction processes can contaminate the soil with heavy metals and other harmful substances. Mining activities, including bauxite extraction, can lead to landscape alteration and land degradation.	Negative impact	Currently investigating this topic to better inform how we manage this risk. At this stage we have conducted an IBAT assessment and identified facilities that are priority facilities for further investigation. In the short term, we are developing our strategies and position.	●					●

ESRS E4: Biodiversity and ecosystems continued

Biodiversity transition plan

E4-1-13(a-f)

We are refining our approach to managing our biodiversity impacts, adopting credible methodologies across AMP to assess and improve performance.

To ensure a greater understanding of our potential impacts on biodiversity, we are working to gain a full understanding of our value chain impacts. While our current actions related to climate, water and pollution already contribute to mitigating nature-related risks, further investigation is required to identify additional impacts not yet addressed.

As part of this process, we plan to adopt the initial phases of the Taskforce on Nature-related Financial Disclosures (TNFD) framework – specifically the Locate and Evaluate stages. These steps will help us to map our interfaces with nature across our operations and value chain and to assess the materiality of our dependencies and impacts on biodiversity.

Insights gained through this approach will be used to assess whether further actions are required. When we have fully identified our direct operational impacts and actions needed, we will consider developing a suitable strategic approach for our value chain.

For more detail, see Double materiality assessment and Value chain sections (pg. 9 and pg. 5)

Once we have assessed our value chain, in addition to our direct operations, we can explore the possibility of producing an analysis of our business model and strategy according to our unique Dependencies, Impacts Risks and Opportunities (DIROs). In addition, this DIRO process will help identify relevant stakeholders for future engagement.

To ensure a greater understanding of AMP's potential impacts on biodiversity we are working to gain a full understanding of our value chain impacts.

Identifying material DIROs and their interaction with our corporate strategy and business model

ESRS 2 SBM-3-26(a-c), ESRS 2 IRO-1-17(a-e), ESRS 2 IRO-1-19(a)

Guided by the TNFD's Locate, Evaluate, Assess and Prepare (LEAP) framework we are assessing our biodiversity impacts. The initial focus is to understand where and how the business interacts with nature. Future analyses will explore how activities and our value chain may impact biodiversity, aligned with the Evaluate stage of LEAP.

Own operations – interfaces with protected areas

For this report, we focused on identifying on AMP's direct operations' priority locations for biodiversity and ecosystem impacts, see the four-stage process below:

- **Step one:** Conducted a WWF Biodiversity Risk Filter (BRF) analysis. The risk indicators in this tool are especially relevant for prioritising AMP facilities in terms of water availability, key biodiversity areas, protected/conserved areas, facilities of international interest and other important delineated areas. For these selected risk indicators, AMP identified priority facilities as those with a BRF risk score of higher than 3.4 – the 'high-risk' threshold of at least one indicator.
- **Step two:** Carried out an Integrated Biodiversity Assessment Tool (IBAT) analysis. The IBAT's Disclosure Preparation (DP) Report assesses the level of overlap of direct operations with biodiversity sensitive locations – i.e. the number of Protected Areas (PAs) and Key Biodiversity Areas (KBAs) within a certain buffer zone. This helped to prioritise facilities for deeper investigation in relation to KBAs and PAs, while assessing biodiversity risk using Species Threat Abatement and Restoration (STAR) scores.

Buffer zones

AMP followed IBAT best-practice recommendations and applied a default buffer zone of 20km. By applying this default zone, the assessment becomes replicable and auditable, as well as avoiding the selection of an operation type that does not align with our activities.

- **Step three:** Analysed the RESOLVE Ecoregions and Biomes dataset in relation to operations. The objective was to gain a full understanding of the biomes and ecosystems that direct operations may interface with, and which, potentially, were not captured by the IBAT DP report. The team applied a 20 km buffer in the analysis of the impact of facilities on surrounding biomes.
- **Step four:** Aligned the ecoregions from the RESOLVE Ecoregions and Biomes dataset with the IUCN Global Ecosystem Typology Report. An important distinction between the two datasets is that the RESOLVE dataset represents only the theoretical, natural biomes of a region and does not account for human-altered landscapes. In contrast, the IUCN Ecosystem Typology includes anthropogenically modified biomes, such as urban and agricultural areas.

ESRS E4: Biodiversity and ecosystems continued

Summary of outcomes

The results identify how many – and which – facilities are classified by IBAT as 'sensitive'. This is based on distance to a KBA or PA, their habitat restoration potential (STAR) and threat abatement potential (START), including a 20km buffer.

To aid prioritisation, the IBAT DP report assesses whether a facility is in or near a biodiversity-sensitive area and assigns a significance score. High, medium and low scores are presented based on the proximity of the facility to a KBA or protected area relative to the buffer size, or based on the maximum START and STAR scores found within the area of influence.

This IBAT analysis allowed us to identify facilities in order of priority as well as potential country hotspots.

Next steps – own operations

We screened all AMP facilities using the BRF analysis. Based on the risk indicators identified, the team used the IBAT to evaluate the biodiversity sensitivity of priority facilities.

Impact assessment involves evaluating biodiversity's sensitivity and exposure to environmental pressures. To identify material impacts, an assessment of impact drivers is required at both corporate and facility levels. Both IBAT and the BRF analysis clarify the nature of the ecosystems that AMP's facilities have potential interactions with.

AMP has also begun to assess biodiversity physical and transition risks and opportunities. The same prioritisation and IBAT mapping enable a focus of effort on locations with the highest potential biodiversity-related risks and dependencies. We will next assess our reliance on ecosystem services at these priority facilities.

A full biodiversity mapping of direct operations and supply chains will provide a useful insight into the systemic risks to which AMP is exposed. The mapping will also help to identify the full range of stakeholders who should be engaged with and point to immediate mitigation measures.

For more detail, see Climate change and Pollution chapters (pg. 16 and pg. 28)

Next steps – value chain

At the Ardagh Group level, we evaluated potential negative impacts from land degradation, desertification and soil sealing. Land degradation was identified, and only within the value chain, rather than direct operations. The IBAT results will guide the selection of facilities for further assessment.

Once we have conducted a full mapping of our direct operations, we will review our value chain in relation to biodiversity. This will illuminate the systemic risks that we are exposed to, together with the appropriate stakeholders, as well as any concrete mitigation measures.

Our approach and policies

E4-2-22, E4-2-23(a-f), E4-2-24(a-d), E4-3

We have conducted an Ardagh Group-wide DMA aligned with ESRS E4 AR-4 to address biodiversity and ecosystems.

We will use the DMA as a foundation to create a future biodiversity policy. We can then tailor this policy to unique identified material DIROs, as required to comply with ESRS 2.[1]

All our manufacturing operations operate under strict environmental management guidelines. These are designed to help mitigate potential impacts on biodiversity – particularly those related to emissions, pollution, waste, water use and wastewater.

To ensure the continual improvement of our facilities, we implement and maintain an environmental management system in accordance with the ISO 14001 standard. The Ardagh Group Risk team has defined and developed corporate expectations and control standards. To ensure adherence to our Environmental Policy, we maintain appropriate assurance controls, including regular compliance checks and annual management reviews.

Our disclosures in relation to Climate change, Pollution, Water and marine resources, and Resource use and circular economy, outline how we minimise our impacts on the environment for these topics.

For more detail, see Climate change, Pollution , Water and marine resources, and Resource use and circular economy (pg. 16, pg. 28, pg. 33 and pg. 41)

Biodiversity and ecosystems targets

We have not yet developed targets in relation to biodiversity. As part of our commitment to advancing nature-related disclosures, we are considering guidelines from the TNFD framework. This will serve as a foundational step in identifying appropriate biodiversity-related targets and mitigation measures, both within our direct operations and across our upstream and downstream value chains. We have also not assessed or disclosed how potential targets would align with the biodiversity and ecosystem DIROs identified across our operations and value chain.

Our current focus is on building an initial understanding of data across our direct operations. This will help guide the potential development of science-based and context-specific targets and better prepare us to navigate evolving regulatory landscapes and stakeholder demands. We aim to integrate biodiversity considerations into AMP's broader sustainability strategy and risk management framework.

1 MDR-P – policies adopted to manage material sustainability matters: https://www.efrag.org/sites/default/files/sites/webpublishing/SiteAssets/ESRS%202%20Delegated-act-2023-5303-annex-1_en.pdf

ESRS E5: Resource use and circularity

As a large-scale producer of aluminium packaging, we are committed to playing a significant role in enabling a more circular economy. Aluminium beverage cans are the world's most recycled drinks package, at 71%.[1] They can play a vital role in enabling circularity, reducing emissions and waste. Recycling aluminium avoids 95% of the energy and emissions generated from producing virgin metal. With a high raw material value and their relative simplicity to recycle, when collected and processed, we believe aluminium beverage cans contribute to a sustainable, closed-loop system.

Resource use and circular economy IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Resource inflows, including resource use								
Dependency on single or limited sources of raw materials can expose manufacturers to supply chain vulnerabilities and price volatility.	Risk	Seeking to mitigate raw material supply chain risks by increasing recycled content in our products and reducing dependence on virgin materials. Through our procurement strategy, we work to diversify sourcing, build strong supplier relationships and reduce exposure to price volatility and availability constraints.	●	●		●		
Continuously improving operational efficiency can reduce the need for resource inputs and lowers operational costs.	Opportunity	Investing in technologies and systems that enhance operational visibility and drive efficiency across our production lines. These improvements reduce the use of raw materials, energy and water, helping to lower costs and resource intensity. Our zero waste to landfill goals complement these efforts by minimising waste and promoting circularity.		●		●		
Incorporating circular economy principles into supply chain practices can reduce resource inflow, promote recycling and extend the life of raw materials.	Opportunity	Sourcing sustainably via the procurement policy, prioritising purchasing recycled aluminium and reducing reliance on virgin materials.	●		●	●		
Resource outflows related to products and services								
Improper disposal of products by consumers creates waste, contributing to global resource outflows.	Negative impact	Partnering with Trade Associations promoting and advocating for increasing recycling rates and education of recyclability of our products.			●	●		
Promoting and offering recycling programmes for consumers can promote proper product disposal and reduce resource outflows.	Positive impact	Supporting Deposit Return Scheme (DRS), Extended Producer Responsibility (EPR) and recycling refund policies through our Trade Associations.			●			●
Transitioning to resource-efficient machinery or technologies can reduce raw material and energy consumption, thereby minimising resource outflows.	Opportunity	Evaluating and testing step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions. We continue to invest in technologies to optimise product design in order to reduce raw materials and energy consumption.		●			●	
Implementing wastewater and waste recycling programs can reduce resource outflows.	Opportunity	Setting a 2030 water intensity reduction of 20%. In addition to our water intensity, we have zero waste to landfill goal by 2025.		●		●		

1 Source: https://international-aluminium.org/new-iai-study-reveals-environmental-benefits-of-increased-global-aluminium-can-recycling/#:~:text=Marlen%20Bertram%2C%20IAI's%20Director%20of,ingots%20for%20a%20second%20life.

ESRS E5: Resource use and circularity continued

Resource use and circular economy IRO table continued

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Waste								
Waste from manufacturing activities can contribute to overall waste volumes if not correctly managed.	Negative impact	Meeting our zero waste to landfill goal by 2025.		●		●		
Compliance costs and penalties may arise from non-adherence to waste management regulations.	Risk	Managing waste-related compliance risks through our BGreen7 standards and ISO 14001-certified environmental management systems at all facilities. These frameworks ensure proper waste handling and documentation in line with regulatory requirements, helping to reduce the risk of non-compliance, penalties and associated costs.			●	●		
Offering product return or recycling schemes to customers can reduce waste from product disposal.	Opportunity	Supporting Deposit Return Schemes (DRS), Extended Producer Responsibility (EPR) and recycling refund policies through our Trade Associations.			●		●	
Consumers recycling or reusing products can reduce the amount of waste going to landfill.	Positive impact	Funding initiatives like Every Can Counts (in partnership with our Trade Associations) to encourage and advance recycling.			●	●		

Our approach and policies

E5-1 -14, 15(a-b)

We have integrated circular economy principles into our long-term sustainability strategy and daily operational practices.

Although our formal policy documentation is still evolving, circular economy principles are already embedded in our strategic roadmaps, project planning, and operational decision-making across the business.

Our approach to circularity is guided by related action plans – which include investments in aluminium recycling, water reuse, waste recovery, and innovative design for recyclability.

For more detail, see Actions and Resource use and circular economy (pg. 43 and pg. 41)

We are currently reviewing and updating our internal governance to reflect our commitments to circular design, waste prevention, reuse and recycling. As part of this process, we are evaluating how our circular economy principles – aligned with both our ambitions and stakeholder expectations – can be formalised into policy. In the interim, these commitments are embedded, directly or indirectly, in the following policies:

- **AMP Code of Conduct Policy and Environmental Policy:** These outline our environmental and ethical principles, including adherence to applicable environmental laws and regulations.
- **AMP Responsible Procurement Policy:** Sets out the expectation that our suppliers use sustainable resources, such as aluminium with a high recycled content.

ESRS E5: Resource use and circularity continued

The International Aluminium Institute has reported that aluminium beverage cans are the world's most recycled drinks package.[1] We continue to collaborate with our suppliers to source aluminium with a high recycled content. Promoting industry-wide recycling and the use of recycled content represents a critical step towards the achievement of our Scope 3 GHG emissions reduction targets.

Achieving global decarbonisation and circularity requires industry-wide action. To drive an increase in the recycled content in our products, we partner with both suppliers and customers. Together, we have identified several strategic initiatives to lower emissions. These include reducing material usage, lightweighting aluminium without compromising quality and procuring aluminium with a higher recycled content.

Actions for circularity

E5-2-17, 18, 19

AMP aluminium beverage cans are inherently recyclable, and a proven contributor to the circular economy model.

In 2024, the share of recycled content in our aluminium beverage can reached 78%.[2] Our initiatives to increase recycling rates and recycled content are key components of our decarbonisation roadmap. With demand outstripping production capacity across all beverage categories, our experience is that consumers are also seeking more recyclable and environmentally friendly packaging.

To promote and advocate for increased metal packaging recycling rates and recycled content, we work in partnership with industry associations. These include the Can Manufacturers Institute (CMI) in North America, Metal Packaging Europe (MPE) in Europe and Abralatas in Brazil – representing the three regions where we operate.

In 2022, we co-sponsored the inaugural Global Aluminium Can Sustainability Summit. This event assembled more than 100 leaders from global organisations in the value chain, with an agenda to operationalise the decarbonisation of aluminium produced from can sheet. Key objectives included the creation of transparent information on recycling and circularity and a plan for how to standardise the measurement of recycled content in aluminium beverage cans.

Two years later, AMP was a key participant in developing, together with industry peers and trade associations, the world's first industry-aligned Beverage Can Recycled Content (BCRD) methodology. This helps to ensure a standard approach to calculating recycled content across the entire aluminium value chain for beverage packaging. We believe this methodology is widely being adopted and will be the industry standard going forward, creating transparency and enabling accountability.

Targets for resource use and circularity

E5-3-21

To support a more circular economy, AMP has set an ambitious 2025 ZWTL target. We minimise waste in all of our operational processes, adopting a reuse and recycle approach wherever possible and a limited amount of waste-to-energy incineration.

We have continued to work in partnership with trade associations to help drive up recycling rates, a key lever to increase the availability of recycled content in packaging. We work in partnership with our suppliers and customers, identifying technologies that will increase the recycled content of both can bodies and ends.

Our procurement strategies and product carbon footprint disclosure requirements have encouraged our suppliers to make progress. In 2024, our products contained an average 78% recycled aluminium compared to 64% in our 2020 baseline year.

Tracking the effectiveness of policies and actions

E5-3-23

Our ambitious target to achieve ZWTL by 2025 reflects the embedded practices of our operations.

In 2024, we made considerable progress, with 83% of all our facilities meeting their ZWTL targets versus 75% of the facilities that had met the target in the previous year. Our Environmental Policy and Code of Conduct set out our environmental and ethical principles and practices, with an emphasis on continual improvement. We are committed to complying with all relevant environmental laws and regulations.

Robust environmental management systems in our production facilities, service centres and offices support our effectiveness. We also champion recycling efforts and reduce waste and reuse materials where possible. We track waste fractions across each facility, monthly, and record actions to reduce, reuse and recycle.

To support regional and facilities' waste management, we have established cross-functional working groups. They meet monthly, consulting with waste collection providers, technical engineering experts and operational teams on best practices and ways to improve performance.

1 Source: https://international-aluminium.org/landing/aluminium-cans-are-the-most-recycled-beverage-container/

2 Percentage assured independently by the Research Institutes of Sweden, May 23rd, 2025.

ESRS E5: Resource use and circularity continued

Targets on waste, products, materials and circular product design

E5-3-24.a

As well as our 2025 ZWTL target, we have also set SBTi-aligned targets to reduce our Scope 3 emissions by 12.3% by 2030.

To meet this goal, we intend to reduce the use of virgin aluminium, promote recycling rates and increase the use of recycled content within our products – avoiding 95% of the energy and emissions used to produce primary virgin aluminium.

Our main raw material, aluminium, is highly recyclable and as an element, it cannot be destroyed. Manufacturers transform aluminium into packaging and many other product applications used in industries such as aerospace, automotive and construction. Once these product applications reach the end of their useful life, the aluminium can be recycled and used again to produce another product application in a 'virtuous circle'. This cycle can occur nearly an unlimited number of times while retaining the structural properties of the metal.

To minimise material consumption and process inflows, we continue to improve the design of our products. We work in partnership with our customers and suppliers on lightweighting and downgauging techniques, reducing the use of resources and their impacts.

Increasing circular versus primary materials

E5-3-24.b, E5-3-24.c

Using recycled content in our products avoids most of the emissions associated with virgin metal.

According to the International Aluminium Institute,[1] in 2022 the carbon footprint of global primary aluminium production, from mine to cast house, totalled 15.1 tonnes of CO_2e per tonne. In contrast, the carbon emissions for producing recycled aluminium (cradle-to-gate) amounted to 0.52 tonnes of CO_2e per tonne. As well as saving 95% of the energy needed for primary aluminium production, recycling production also saves the direct and indirect GHG emissions associated with primary production.

We have recycling rate goals for metal beverage cans in all of the regions where AMP operates:

- As a member of Metal Packaging Europe (MPE), we support our trade association partners' ambition to achieve a 100% recycling rate by 2030
- In the United States, the Can Manufacturers Institute (CMI) has published a recycling roadmap announcing a 70% recycling rate goal by 2030, 80% by 2040 and 90% by 2050
- In Brazil, the industry association Abralatas is committed to maintaining one of the highest recycling rates globally, achieving a ~100% recycling rate[2] for aluminium beverage cans in 2023

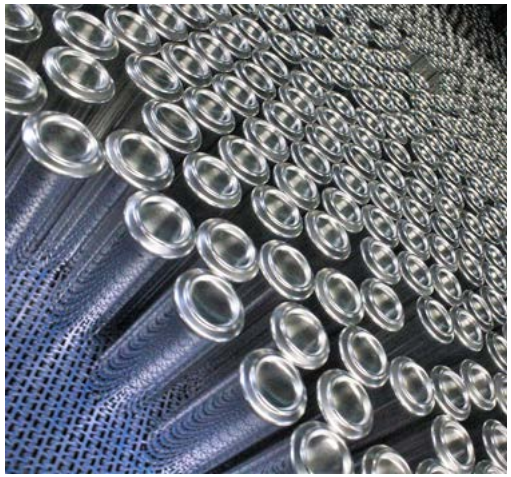
We continue to increase the amount of recycled content in our products, supporting our SBTi Scope 3 reduction and net zero ambitions. We achieved 78% recycled content in 2024, compared to 64% in our 2020 baseline year.

Sustainable sourcing and renewable resources

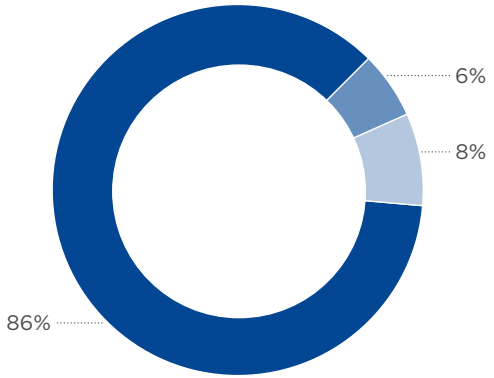
E5-3-24(d), E5-3-24(f)

We drive sustainable sourcing via the AMP procurement policy and our SBTi-aligned targets for Scope 3, which accounted for 86% of our overall 2024 GHG emissions.

The emissions associated with our raw material aluminium contributed 91% to the overall emissions total, see the infographic below. As stated previously, 95% of the energy and emissions associated with primary aluminium can be avoided by sourcing recycled metal. Our procurement strategy and partnerships with our suppliers prioritise obtaining higher recycled amounts.



2024 Scope 1 t CO_2, Scope 2 t CO_2, Total Scope 3 Emissions t CO_2e (M tonnes)



2024 Scope 3 by Emission Category t CO_2e (M tonnes)

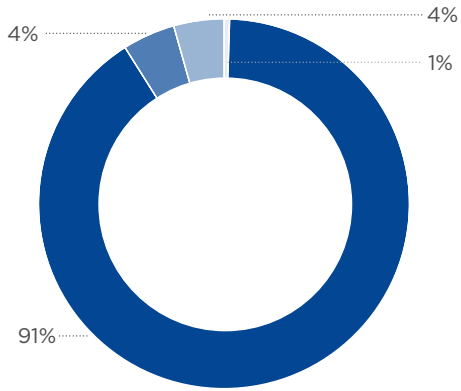


Fig. Emissions by Scope and sources of largest share – Scope 3 – in the value chain

1 Source: https://international-aluminium.org/
2 Source: https://abralatas.org.br/wp-content/uploads/2024/11/RELATORIO_ESG_ABRALATAS_2024_compressed.pdf

ESRS E5: Resource use and circularity continued

Waste management

E5-3-24(e)

In 2024, 83% of AMP facilities achieved our ambitious 2025 ZWTL goal and we are on track to meet this target. Our waste management strategy addresses the following activities:

- Recycling – including recovery and preparation for reuse of materials
- Disposal – including waste-to-energy, incineration with no energy recovery, fuel blending, chemical or physical treatments and landfill

The focus across all our operations is to follow the hierarchy of waste, see below, and to use the correct treatment to minimise the environmental impact of any operational waste generated.

Details on the nature of our targets

E5-3-25, E5-3-27

Our ZWTL targets are voluntary, following guidance proposed by the Waste Management Directive 2018-851 EU.

The focus across all our operations is to follow the accepted waste hierarchy[1] and to use effective treatments that minimise the environmental impact of any generated operational waste. We prioritise avoiding the generation of waste. We reuse or recycle any unused material with a limited amount sent to waste-to-energy recovery facilities. Our actions in order of preference, are as follows:

1. Prevent
2. Reuse
3. Recycle
4. Recover
5. Dispose

Through our ZWTL target, we are driving the behavioural change needed across our operations to ensure the waste hierarchy is prioritised. We focus first on eliminating waste at its source, then on treating any remaining waste as a valuable resource by maximising reuse and recycling. Where reuse or recycling is not possible, we direct waste to energy recovery programmes.

Resource inflows

E5-4-30 & 31(c), E5-4-31(a-b)

Unlike some materials, aluminium maintains its properties during remelting and reprocessing. This viability is a key reason why 75% of all aluminium ever produced is still in circulation today.[2]

Aluminium, a metal element, is inherently recyclable and supports a more circular economy.

Aluminium accounts for the highest proportion of our purchased goods and the largest proportion of our materials inflow used to produce beverage cans.

Within our operations, the use of virgin aluminium is limited, equating in 2024 to 155,522 tonnes. In the same year, we used 554,623 tonnes of recycled aluminium, enabling the production of cans with 78% recycled content, a key lever in our decarbonisation plan

Through our partnerships with trade associations, we continue to advocate for increasing recycling rates and the use of recycled content in beverage packaging, supporting a more sustainable use of raw materials.

Upstream to our operations, bauxite mining is essential to produce virgin aluminium but can result in negative environmental impacts. To mitigate these, the aluminium industry has increasingly focused on adopting sustainable mining practices and implementing comprehensive environmental conservation efforts. These measures, which we believe need to be reinforced and practised as widely as possible include:

- When necessary, clearing land, responsibly
- Collecting timber and seeds for revegetation
- Using mining machinery as efficiently as possible
- Ensuring equipment is regularly maintained
- Optimising transport routes to reduce emissions and other forms of pollution

The AMP Responsible Procurement Policy stipulates that our suppliers use sustainable resources, and we seek partner companies who address their environmental impacts. Our production processes use no biologically derived materials. We request that our aluminium cansheet suppliers assess their environmental footprints and provide us with product carbon footprint data. We ask for this across the entire value chain – from mining to shipping rolled aluminium sheet coils for beverage can production, known as 'cradle-to-gate'. We also support sustainable practices across the entire value chain, such as suppliers setting science-based emissions targets.

Aligning our industry on disclosing recycling content

E5-4-32, E5-5-40

AMP has supported the revision and standardisation of the methodology used to calculate recycled aluminium content.

Our sponsorship and partnership with CMI has contributed to the Beverage Can Recycled Content (BCRC) measurement methodology being adopted across the industry. The method outlines in detail how the recycled content is captured and all AMP suppliers now use it to report recycled content. To obtain AMP's annual corporate GHG emissions inventory data, we collect the metrics from these suppliers and verify the information through a third-party.[3]

1 See Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives: https://eur-lex.europa.eu/eli/dir/2008/98/oj/eng
2 Source: https://www.aluminum.org/Recycling
3 Data assured independently by the Research Institutes of Sweden, May 23rd, 2025.

ESRS E5: Resource use and circularity continued

Resource outflows

E5-5-33 & 34, E5-5-36(c)

At AMP, we aim to use less virgin raw materials by increasing the recycled content of the beverage cans we produce. We also work with our suppliers on lightweighting and downgauging efforts.

We make all of our products from aluminium, a metal that can be recycled and reproduced without compromising on quality, and which supports a circular economy. We reroute all our processed aluminium scrap and spoilage back to can sheet suppliers for recycling.

In 2024, 78% of the aluminium used to manufacture our products was recycled, avoiding 95% of the energy and Scope 3 emissions compared to using virgin metal. We promote end-of-life recycling initiatives such as Every Can Counts. Through our trade association partners we advocate for deposit return schemes (DRS) and increasing recycling rates, post-consumer.

Our waste management strategy and zero waste to landfill commitment is evidence that we are seeking to minimise waste generation. Where feasible, we adopt a reuse and recycle approach to all waste and in 2024, 83% of all of AMP's facilities achieved ZWTL.

Product durability and structural integrity

E5-5-36(a-b)

Our aluminium beverage containers are designed to deliver high performance, preserve product quality and support circular use models.

The cans are lightweight, airtight and lightproof, effectively protecting beverages across a wide range of alcoholic and non-alcoholic categories. Their construction ensures an extended shelf life and prevents degradation due to oxygen or light exposure.

The can body is sealed at the filling line through a process called double seaming, creating a hermetic closure that maintains carbonation and prevents contamination. While not designed for repair, the robust and permanent nature of this packaging supports high recyclability and minimal material degradation. Our packaging solutions deliver durable, high-performance formats that we believe align with long-term sustainability goals.

Reducing waste

E5-5-37(a-b)

We process our waste according to the following hierarchy:

- Recycle – includes preparation for reuse and recover
- Dispose – covers waste-to-energy, combustion and incineration with no energy recovery, fuel blending plus chemical and physical treatment
- Landfill

Waste generated by Ardagh Metal Packaging facilities during 2024

E5-6-41, E5-5-39

AMP absolute operational waste (tonnes)	2023	2024
Sum of total waste	22,568	24,796
Sum of total waste disposed	1,533	4,258
Sum of total waste recovered	17,971	18,839
Sum of waste landfilled	3,064	1,699
Sum of total hazardous waste	8,254	10,134
Sum of radioactive waste	–	–
Sum of total non-hazardous waste	14,314	14,662

Non-recycled waste

E5-5-37(d)

AMP waste ratios (%)	2023	2024
Waste recovered	80%	76%
Waste not recovered	20%	24%

ESRS E5: Resource use and circularity continued

Sorting waste into appropriate channels

E5-5-38(a)

We generate a limited amount of both hazardous waste and non-hazardous waste, see table above. For non-hazardous content, most of the waste is by-products from processing. We return all excess aluminium to the suppliers as scrap – to be recycled and reused in the aluminium sheets procured for beverage can manufacture. We generate hazardous waste intermittently and this is carefully managed according to strict regulations. We track and report the quantity of both hazardous and non-hazardous waste for every facility, and we review and assess all data for accuracy, reporting annually.

Composition of waste generated

E5-5-38(b)

Aluminium scrap accounts for the majority of the waste generated within our operations. We return this to our suppliers for recycling. The remainder is process waste, consisting of:

- Filter cake
- Oils and grease
- Lacquers, solvents and cleaning chemicals
- Solid contaminants such as absorbents and filters
- Mixed municipal including household waste
- Packaging, including: secondary packaging contaminated/non-contaminated and interlayer pads that are reused or recycled
- Paper and cardboard that is sent for recycling
- Wood
- Electrical items

Anticipated financial effects of circularity

E5-5-6

Aluminium retains a high value after consumer use, making it a financially viable material in a circular economic system.

Our circularity strategy centres on increasing the recycled content of the aluminium used in the manufacturing of our beverage cans. Recycled aluminium is an efficient alternative to the use of new metal. This is due to the high intrinsic value of the material, a comparatively low rate of material losses per cycle and the low energy and processing requirements in recycling – compared to the production of virgin aluminium. We believe the potential for a high level of circularity is a particular strength of the beverage can. AMP has been successfully collaborating with suppliers for many years to increase recycled content and is looking to continue this trajectory, while lessening the environmental impact of our business.

Risks

On an industry scale, a continued transition towards very high levels of circularity will depend on the availability of aluminium scrap to meet increasing demand. While several sources of process scrap are used in can making, a large portion of recycled material already comes from used beverage cans.

The availability of material made from used beverage cans depends on both the installation of sufficient recycling capacity and the collection of used cans from consumers. If supply – based on these key factors – does not grow to the requirements needed to support the ongoing increase in circularity, we can anticipate risks to the further decarbonisation of beverage cans. This will also potentially lead to financial impacts from the sourcing of recycled material or from upcoming carbon pricing legislation in some of the markets we operate in.

Opportunities

To address the risks, AMP is partnering with industry associations and making key investments in programs to promote recycling and enable the sufficient availability of used beverage cans (UBCs):

- **North America:** Partnering with the Can Manufacturers Institute (CMI) to fund can capture equipment at five Material Recovery Facilities, recovering 140 million cans annually
- **Europe:** Supporting the Every Can Counts campaign through Metal Packaging Europe (MPE)[2]
- **Brazil:** Promoting aluminium can recycling through Abralatas and contributing to Brazil's 100% recycling rate since 2022

To increase the availability of UBCs, AMP has invested approximately $1.06 million[1] in these programmes through our industry associations. While we recognise the limitations in our ability to impact consumer behaviour and drive regional scrap markets towards more circularity, we believe in contributing to industry-wide efforts that can reach the required scale to have a meaningful impact. We also advocate for recycling-friendly legislation in the markets we operate in.

1 MPE ($577,883) plus CMI ($257,000) plus Abralatas ($225,161).
2 We engage with Every Can Counts in all operating regions, this is an example of how we advocate for UBCs in Europe.

ESRS Social

ESRS S1: Own workforce

Everyone in AMP shares a common Purpose – we make packaging for good. We support this culture through our Core Values – Inclusion, Trust, Teamwork and Excellence. These inform our culture, policies and working practices, underpinning everything we do at AMP. While our working environment may change, our commitment to these Core Values is constant. They are the foundations supporting our dedication to the business and respect for each other. They also directly inform both the AMP Code of Conduct and our policies.

Own workforce IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49, S1-5

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Working conditions – Working time, adequate wages, work-life balance								
Offering good work-life balance, competitive wages and employment opportunities helps attract and maintain highly skilled personnel.	Positive impact	Actively safeguarding our employees' working conditions by implementing and Maintaining comprehensive social protection measures. We conduct regular reviews of our salaries against local and global market benchmarks to ensure our compensation remains competitive and equitable across all regions we operate.		●		●		
Working conditions – Social dialogue, freedom of association & collective bargaining								
Failure to engage compliantly in collective bargaining or lack of effective workers' representation could lead to strikes work stoppages, and legal disputes.	Risk	Respecting the rights of employees to freely form or join organisations of their choice to represent their interests. We engage constructively with these organisations, including in collective bargaining processes, in accordance with applicable laws and practices.		●		●		
Respecting the right of workers to form work councils or join labour unions can foster open dialogue, promoting a harmonious and productive work environment.	Positive impact	Maintaining regular and constructive engagement with employee representatives, including trade unions and Works Councils, to support open dialogue, collective bargaining and the continuous improvement of working conditions.		●		●		
Working conditions – Health and safety								
Non-compliance with health and safety standards can result in workplace accidents, serious injuries, lost work time and regulatory fines.	Risk	Health and safety underpins all our practices. We regularly review the effectiveness of BSafe! 7 / 7+ and other elements of our safety management programme with internal assessments and audits. We continuously raise awareness of health and safety within the organisation through multiple channels.		●		●		
The risk of injury to the workforce can be reduced and proactive safety culture, enhanced, by setting new industry-leading standards and following best practices in health and safety.	Opportunity	Health and safety is key to all of our practices. We continuously raise awareness of health and safety, through multiple channels. We regularly review the effectiveness of BSafe! 7/7+ with internal verification audits, and one of our safety management is that plants complete self-assessments against all BSafe! Standards and create an action plan to close any non-compliances or gaps.		●			●	

S1: Own workforce continued

Own workforce IRO table continued

ESRS 2 SBM-3-48 (b-c), SBM-3-49, S1-5

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Equal treatment and opportunities for all – Gender equality and equal pay								
Disregarding gender equality and equal pay laws could lead to legal penalties and reputational damage.	Risk	Having employment practices built around the principles of fairness and consistency. We are committed to embedding equal pay as a core principle across our organisation.		●			●	
Equal treatment and opportunities for all – Training and skills development								
Lack of training and development opportunities could decrease employee morale and job satisfaction, lower productivity and increase turnover rates.	Risk	Committing to building a highly skilled workforce through innovative learning practices and a comprehensive training programme. In 2024, we developed the Learning Academies, which provides structured development pathways within our key capability areas. Our Executive Mentoring programme pilot was launched in January 2025 matching Mentors and Mentees on a six-month programme.		●			●	
Equal treatment and opportunities for all – Measures against violence and harassment in the workplace								
Mishandling or ignoring cases of harassment or violence can lead to legal penalties and reputational damage.	Risk	Providing a Speak Up Hotline that allows for confidential reporting of discrimination or harassment. Any such reports, however received, are handled by a dedicated legal team and appropriate action is taken where required. The Audit Committee receives an overview of all such cases on a quarterly basis.		●		●		

S1: Own workforce continued

Policies related to our workforce

S1-120(a-c), S1-121, S1-123, S1-124(a-d)

We strive to create a safe, inclusive, and supportive work environment.

We are committed to fair and equitable employment practices and to operating with the highest standards of integrity and honesty. We expect full compliance with all applicable laws and regulations across the business and our supply chain. The AMP Code of Conduct (our Code) is the framework for achieving this commitment and sets out the principles and expectations for what we consider to be acceptable behaviours.

Our Code, along with our policies, aims to eliminate discrimination and harassment, to promote equal opportunities and advance diversity, equity and inclusion. Together, they also seek to protect human rights and individuals' health and safety. The Board has approved the Code, which is reviewed and updated on a regular basis.

Our Code applies to everyone in the AMP business, including all directors, officers and employees worldwide (collectively 'employees'). This also includes all AMP companies and any joint ventures we control. AMP also expects all our business partners to adhere to the principles and values set out in our Code. Detailed underlying policies support the high-level commitments set out in our Code – including in relation to workers' rights, health and safety, and human rights.

We are dedicated to fostering a positive and productive work environment that enhances the overall well-being and growth of our employees. The AMP Employment Policy details our collective respect for the International Labour Organization (ILO), Declaration on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

We support employees' freedom of association and right to collective bargaining. We also back 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. The AMP Employment Policy also details our commitment to: social dialogue; diversity, equity and inclusion; creating a workplace free of violence and harassment; and fostering open communication.

Supporting the commitments in AMP's Employment Policy, we have implemented additional comprehensive policies, covering areas such as well-being, learning and development, recruitment, onboarding, compensation and benefits, and personal development reviews.

Safety is integral to AMP, aligning with our Core Values and our commitment to work safely and to prevent incidents. It is AMP's commitment to provide a healthy and safe workplace for all employees, visitors and contractors operating within our workplace. AMP is committed to complying with the laws that regulate health and safety and managing workplace behaviours and practices that can lead to occupational injuries and illnesses. Further provisions are detailed in our Health & Safety Policy.

For more detail, see Creating healthy and safe workplaces (pg. 56)

Our commitments to human rights, in addition to being set out in our Code, are also included in the AMP's Social Sustainability Policy. This details our respect for the Universal Declaration of Human Rights, and our commitment to complying with human rights in our business and value chain.

For more detail, see Workers in the value chain (pg. 58)

Our Speak Up and Whistleblowing Policy details the mechanisms that we have put in place to enable and encourage employees to speak up if they identify any identify any concerns, including in relation to violations of our Code or any of our policies.

For more details on our approach to respecting human rights, see Business conduct (pg. 68)

All the above-mentioned policies are approved in line with AMP's Policy Management Framework, which requires groupwide policies to be approved by the highest level of management. The Framework sets out the basis for how group policies can be developed, issued, implemented and maintained. This includes guidance on communications and regular training. To ensure the highest standards of compliance, we diligently review our policies and closely monitor performance.

We strive to prevent accidents, occupational injuries and workplace illnesses by:

- Providing the appropriate physical conditions and protections
- Implementing robust standards and procedures
- Fostering the right behaviours
- Promoting work and life balance
- Tracking, from 2025, all participation metrics via our learning management systems myLearning

Further provisions regarding Safety can be found in our Health & Safety Policy.

S1: Own workforce continued

Engaging with our own workforce and representatives about impacts

S1-2.27(a-e), S1-2.28, S1-2.29

Two-way communication between the management team and employees is vital for AMP, enabling us to recognise performance, promote teamwork and celebrate results.

We engage with our employees throughout the year in a variety of ways. Our two-way approach ensures our employees are informed on important developments, policy updates and news from around the business; and that we also understand our employees and their viewpoints, as well as areas for improvement.

- We conduct a biennial Global Engagement Survey in partnership with a market-leading employee experience platform. Our 2024 Global Engagement Survey had a 74% participation response rate. To effectively address survey results, we hold meetings with employees at each of our offices and facilities to design local action plans. We also organise leadership meetings to discuss results and design regional and global action plans.

  We communicate actions taken to employees and provide regular updates, following up on progress throughout the year. AMP's global favourable engagement rate remained stable at 64% in 2024, having been 66% in 2022. We scored above the industry average on: 1. Everyone knowing what is asked of their roles to be successful; 2. Pride in our sustainable product range; and 3. Feeling supported within roles for flexible working arrangements where available. We have committed to placing greater emphasis on Leadership Communication.
- Twice a year, our AMP Leadership Executives broadcast company-wide townhalls, sharing key operational, business and market updates. AMP's CEO and Regional Business CEOs also broadcast local quarterly townhalls, with region and country-specific updates. On myArdagh, our intranet system, we distribute regular monthly employee emails, which accompany bi-weekly news updates (published in relevant languages).
- To increase communication with manufacturing employees, we also feature company news and updates on TV screens at every AMP location.
- We engage with employee representatives, including unions and works councils. The Ardagh Group European Works Council (EWC) has an open dialogue with our management team. The EWC and the management team have established a fair and trust-based relationship. Regular meetings include discussions on employee-related topics affecting European countries and provide a forum for exchanging views on company statements and policy drafts. At our Annual EWC Forum, participants talk directly with the management team and receive business updates.
- In the US and Brazil, we have regular business updates, discussions on current trends, and the prioritising of our workforce needs. As outlined in our Collective Bargaining Agreements, we frequently meet with local unions to address specific issues.

S1: Own workforce continued

Supporting our workforce to raise concerns

S1-3.32(a-e), S1-3.33, S1-3.34

We encourage employees, contractors and any other individuals in our workforce to speak up if they have concerns, without fear of retaliation or discrimination.

Employees can raise concerns, including on violations of our Code, confidentially through our established reporting channels: they can speak to their line managers, local Human Resources, or our Ardagh Group Legal and Compliance team. Our Speak Up Hotline is available for individuals to raise concerns anonymously. Our Speak Up and Whistleblowing Policy outlined in our Code, provides guidance on how to access these channels and details the procedure for how concerns are handled. We take all concerns seriously, with reports handled by qualified investigators.

For more detail, see Workers in the value chain (pg. 58)

All employees receive training on reporting concerns, including on how to use the Speak Up Hotline and on our commitment to protecting reporters from retaliation or discrimination. The AMP Compliance Committee, reporting to the Audit Committee of the Board (Audit Committee) manages the effectiveness of AMP's Speak Up and whistleblowing programme and policy. The Audit Committee maintains oversight of all compliance cases, including those raised via the Speak Up Hotline.

Employee characteristics

S1-6-50(a-f)

Total AMP employees by country in 2024

S1-6-50(a)

Country[1]	Employees
Serbia	150
Spain	154
Austria	164
France	316
Poland	319
Netherlands	365
United Kingdom	703
Brazil	946
Germany	1,164
United States	1,820

1 Table excludes countries with less than 50 employees.

AMP employees by contract type and gender (excl. Board)

S1-6-50(b)

Headcount	Female	Male	Not declared/Other	Total
No. of permanent	873	5,011	5	5,889
No. of temporary	73	206	0	279
No. of non-guaranteed hours	0	0	0	0
No. of employees total	946	5,217	5	6,168

AMP employee turnover in 2024

S1-6-50(c)

Headcount	Total
Total number of leavers	773
Rate of employee turnover	13%

Methodologies and assumptions

S1-6-50(d)

As of 31 December 2024, AMP's total employee headcount was 6,168. This was calculated based on the total of all active employees as of the last day of the reporting period. The employee turnover rate is determined by comparing the number of employees who have left the company to the average number of permanent employees during the reporting period. This rate includes all types of departures, whether voluntary or involuntary.

Contract types:

- Permanent – Employment with no predetermined end date
- Temporary – Employment for a specific period, with a clear start and end date
- Non-guaranteed hours – Employees have no guarantee of working hours

The workforce figures as of 31 December 2024 were formally submitted to the Finance Department. These figures have been incorporated into the Annual Report.

S1: Own workforce continued

Collective bargaining and social dialogue

S1-8-60(a-c), S1-8-61, S1-8-63(a-c)

AMP recognises that employers and employees have both mutual and potentially competing interests.

We recognise the importance of social dialogue, including at an international level, as well as applicable collective bargaining structures. We respect and do not obstruct the right of employees to form or join their own organisations to advance their interests or to bargain collectively. To mitigate any adverse impact to the greatest extent possible, we provide reasonable notice to the appropriate government authorities and employee representatives bodies, where changes in operations would have major employment impacts.

Representation metrics for 2024:

- Collective bargaining agreements covered more than 60% of AMP's employees, highlighting our commitment to fair labour practices and employee rights
- Workers' representatives supported more than 79% of AMP's employees across all regions, helping to ensure their voices are heard and their interests are advocated for within the company.

Collective bargaining coverage

S1-8-60(b-c)

Coverage Rate	Employees – EEA (for countries with >50 employees)		Employees – Non-EEA (estimate for countries with >50 employees)	
0-19%	Ireland	0%	Serbia	0%
	Poland	0%		
20-39%			United States	32%
			United Kingdom	35%
40-59%				
60-79%	Germany	86%	Brazil	100%
80-100%	Spain	90%		
	Netherlands	99%		
	Austria	100%		
	France	100%		

Global percentage of employees covered by workers' representatives

S1-8-63(a)

Coverage Rate	EEA countries	Non-EEA countries
100%	Spain	Brazil
	Germany	United Kingdom
	Ireland	Serbia
	Netherlands	
	Poland	
	Austria	
	France	
32%		US
0%		Switzerland

S1: Own workforce continued

S1-9 Diversity

S1-9-66(a-b), S1-12

Diverse talent can help to solve our biggest challenges, driving growth and our continued success.

We organise our Diversity, Equity and Inclusion (DE&I) strategy through the pillars of Culture, People and Processes. We aim to create a positive working environment where everyone is treated with fairness and respect within AMP. Externally, we expect the same attitudes and standards when collaborating with customers, suppliers and in the global marketplace. We ensure alignment with the laws and regulations of every jurisdiction in which we operate.

To support our commitment to support DE&I, we continuously review and enhance our employee lifecycle processes. In 2024, our DE&I champions reviewed our talent practices. This biennial process ensures alignment of our practices with our DE&I principles and values. We compare our performance against industry data, and report regularly against our sustainability commitments.

Recruitment

We are committed to providing equal employment opportunities for all applicants and employees. We do this in a fair and consistent manner, free from discrimination. Factors such as ethnicity, colour, religion, gender, national origin, ancestry, age, disability, marital status or sexual orientation should not be part of any AMP hiring or promotion process. All our employment decisions are based on legitimate considerations, including skills, qualifications, performance and business needs – in accordance with our Employment Policy.

Gender distribution at top management[1] level 2024

S1-9-66(a)

Female		Male	
Headcount	Percentage	Headcount	Percentage
4	8%	45	92%

Age distribution across all employees 2024

S1-9-66(b)

Age groups	Number of people	Percentage
<30	1,016	17%
30-50	3,346	54%
>50	1,806	29%

1 Top management in the business is defined not more than two levels below the Board.

As part of our broader commitment to inclusion, we are also investing in the future workforce through our Ardagh for Education initiatives. These efforts aim to build a more diverse pipeline of workers by supporting education access and equity, particularly encouraging more girls to pursue STEM subjects.

For more detail, see Spotlight story (pg. 65)

Adequate wages and remuneration

S1-10, S1-16

We seek a culture that is fair and equal, and we reflect this in how we reward our teams for their efforts.

We want our people to feel rewarded fairly for their talent and hard work. An adequate wage should enable employees to cover basic expenses, such as housing, food, healthcare and education, and provide some discretionary income.

We operate fair and consistent pay frameworks that reward employees for their competence, capability and experience, relative to the market for their role. These principles enable us to attract and retain high-quality, talented employees who are motivated to develop and grow their careers within the business. In 2024, our remuneration packages reflected the following:

- All wage packages were above the relevant local statutory minimum wages in all relevant countries
- The gender pay gap stood at 15% for AMP. This is the difference in average earnings between male and female employees across our organisation, regardless of seniority or tenure

Social protection

S1-11-74 (a-e), S1-11-75, S1-11-76

We believe in supporting our valued employees during periods of hardship and complexity.

Our comprehensive social protection programs include employee assistance programmes or support for situations such as illness, unemployment, work-related injuries, parental leave and retirement. We strive to create a positive work environment where employees can thrive. We believe this supports engagement and productivity and is key to ensuring wellbeing. We know that wellbeing goes beyond the workplace, and we offer programmes that are designed to support employees in activities outside the working environment.

S1: Own workforce continued

Training and skills development

S1-13-83(a-b)

AMP is committed to nurturing our employee's potential and supporting their professional growth.

Employee training and skills development are integral to our strategy. Our approach focuses on continuous employee development through regular feedback, personalised development plans and clear goal setting. We believe we are developing a highly skilled workforce through innovative skills development practices and a comprehensive training programme. Our learning and development strategy aims to create a competitive advantage, combining in-house expertise with external learning content.

Across our global teams we have developed strategic partnerships with training vendors, to provide innovative learning tools and build in-house teaching expertise. Our comprehensive skills development programmes focus on knowledge, skills and behaviours required and are presented in different formats. These include internal and external courses, eLearning, on-the-job training/assessment and instructor-led materials, coupled with reporting dashboards that provide oversight.

All employees in all regions now have access to the myLearning platform. This enables all employees to access learning opportunities, with the platform also serving as a central repository for training records. Our learning resources include key materials on topics such as leadership, business and people skills, sustainability and environmental health, IT, health and safety, leadership, team building, quality management topics, languages, communication skills and legal and compliance topics. In 2024, we developed the AMP Learning Academies, which house pathways in our key development areas.

We have established communication networks across our learning and people development leads globally, supported by regular learning and development meetings.

Our existing and developing leaders have leadership development programmes and digital/workshop learning activities. We also provide assessments, coaching and mentoring opportunities. Topics include unconscious bias, respectful workplace training, supervisor training, emotional intelligence and leading difficult conversations. The AMP Executive Mentoring programme pilot was launched in January 2025, matching 4 mentees and 6 mentors, paired across the regions. Over a period of six months, mentors and mentees meet on a regular basis to discuss the mentee's professional development.

Employees participating in regular performance and career development reviews

S1-13-83(a)

Female			Male		
Total Headcount	Participants	Participation Rate	Total Headcount	Participants	Participation Rate
911	785	86%	5,181	3,935	76%

All employees participate in compliance training, including on our Code, Speak Up and Cyber Awareness. This accompanies targeted safety and job-specific training.

Creating healthy and safe workplaces

S1-14-88(a)

We are determined to provide a healthy and safe workplace for all employees, visitors and contractors operating within our workplace.

We want all our employees to return home safely to friends and family each and every day. The prevention of physical harm and support for mental health and wellbeing are vital to our organisation and supported by policies, processes and training.

At AMP, we articulate our approach to workplace health and safety through the BSafe! 7/7+ Programme (BSafe! 7/7+). Managed by our dedicated Environmental, Health and Safety team, the programme incorporates training and communications, which cover safety topics including traffic safety, machine operations and work permits.

Internal audits enable us to regularly review the effectiveness of BSafe! 7/7+. These assess all aspects of our safety management, including policies, planning, implementation and operation and corrective actions. Timely safety reviews help encourage accountability and safety performance for all AMP facilities.

We continuously raise awareness of health and safety, the role of protective equipment and need for constant improvement in workplace and procedural safety. All our production facilities implement an accident and injury investigation system, which also covers near-misses. This examines root causes and identifies potential short- and long-term corrective actions, together with emergency action plans.

Work-Life balance

S1-15-93(a-b)

We take a holistic approach to supporting our employees in the conviction that their health and wellbeing is fundamental to the sustainability of our business. We support a work-life balance by offering hybrid working, which provides flexibility for employees in eligible roles. To encourage well-being and productivity, we also seek to ensure reasonable working hours for all employees in line with local guidelines.

Employees entitled to family related leave and percentage of employees that took family-related leave

S1-15-93(a-b)

We are dedicated to fostering a supportive and balanced work environment, with 96% of our workforce entitled to family-related leave. In 2024, 2% and 8% of our female and male workforce, respectively, took advantage of this benefit.

Rewarding employees

We know the tremendous value our people bring to their work. We seek a culture that is fair and equal and we reflect this in how we reward our teams for their efforts. We want our people to feel rewarded fairly for their talent and hard work.

To provide consistency in our approach to recognition across AMP, we have employee recognition and reward global guidelines. When local laws, regulations and labour agreements dictate, we adapt the details to local contexts as necessary.

Remuneration reflects each employee's competence, capability and experience, relative to the market for their role. These principles enable us to attract and retain high-quality, talented employees who are motivated to develop and grow their careers within the business. We have variable remuneration

S1: Own workforce continued

incentive schemes, reflecting our core values, and employees are rewarded for delivering against key performance indicators relevant to their role, such as productivity, efficiency, quality and financial performance.

Benefits

We offer comprehensive benefits programmes tailored to each employee's position, location and organisational level. These are designed to present a compelling total rewards package for all employees, wherever they work. Benefits include pension and retirement support or health and wellbeing provisions, available to all our employees. Conditions of work, wages and other forms of remuneration comply with national laws and regulations. They are consistent with applicable International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

Protecting human rights

S1-17-103 (a-d), S1-17-104(a-b)

AMP is committed to ensuring that there are no human rights abuses in our business and supply chain.

In addition to the human rights policies described above in Own workforce, Ardagh Group has implemented a risk-based management system. This helps us to identify and manage potential social, ethical, and environmental risks across our business and supply chain, including the risks of child labour and forced labour. We have conducted human rights risk assessments at each of our operating locations, with all risks rated 'low'.

For more detail, see Own workforce (pg. 49)

As described above in Supporting our workforce to raise concerns, we encourage all employees to report issues, including those related to human rights, and all such reports are investigated. Where there are any potential negative impacts, we consider additional mitigation measures. In addition to encouraging reporting, we have also adopted an internal procedure on reporting child labour and modern slavery. This procedure includes detail on indicators for modern slavery and how to report and remediate issues.

For more detail, see Supporting our workforce to raise concerns (pg. 53)

Certain employees within our business, including those in our HR team, are required to undertake annual online training. This covers our policies, how to recognise signs of human rights abuses and the steps to take if our employees encounter them. AMP publishes all relevant actions in an annual Modern Slavery Statement, approved by the Board and made available on our website.

AMP undertakes risk assessments in each location to identify risks of human rights abuses, including child labour and forced labour, within its business and supply chain. We have various procedures and controls to ensure that there are no human rights abuses. For child labour, these include age verification processes for potential employees prior to commencing work at AMP.

Discrimination (including harassment)

S1-17-103(a-c)

The Audit Committee receives quarterly overviews of all compliance cases, including those related to discrimination, including harassment. We had the following work-related incidents or complaints in 2024:

a. Total number of incidents related to discrimination and harassment reported in 2024 which were substantiated: 9[1]

b. Total number of complaints raised within AMP in 2024 relating to discrimination and harassment, including those through the Speak Up Hotline (not including the incidents mentioned in a.) – i.e. cases there were not substantiated or uninvestigable due to lack of information: 51[2]

c. Total amount of fines, penalties and compensation for damages because of incidences disclosed above: 0

Human rights incidents

S1-17-103(a-b)

AMP did not identify any severe human rights incidents connected to its workforce in 2024, nor did we receive any fines, penalties or need to pay compensation for damages for any such incidents.

1 Note: this does not include cases reported in 2023, which were substantiated in 2024.
2 Note: the figures provided for number of complaints raised via our Speak Up Hotline, where the reporter identified that their concerns related to discrimination and harassment. These figures may also include cases reported via local HR and our compliance team. The numbers may not include cases that were handled via a grievance mechanism, or which were handled via trade unions or workers representatives.

ESRS S2: Workers in the value chain

Responsible labour practices are fundamental to our sustainability strategy and decision-making. We prioritise the well-being and human rights of all workers in our value chain. This is the right thing to do but it also helps to secure the longevity of our business, reduce risks and boosts long-term performance.

Workers in the value chain IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Working conditions – Working time and adequate wages								
Suppliers not adhering to working time laws and regulations could face regulatory action, impacting supply chain reliability.	Risk	Expecting and requiring our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence, and risk assessments we look to ensure that these values are being upheld in our supply chain.	●	●			●	●
Working conditions – Social dialogue, freedom of association & collective bargaining								
Suppliers with poor social dialogue practices could face increased employee turnover, impacting supply chain reliability.	Risk	Expecting and requiring our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence, and risk assessments we look to ensure that these values are being upheld in our supply chain.	●	●			●	●
Working conditions – Health and safety								
Workplace accidents or health issues among suppliers could have negative impacts on individuals and impact supply chain reliability.	Risk	Expecting and requiring our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence, and risk assessments we look to ensure that these values are being upheld in our supply chain.	●	●			●	●

ESRS S2: Workers in the value chain continued

Policies related to value chain workers

S2-1-16, S2-1-17(a-c), S2-1-18, S2-1-19

Our concern for human rights extends beyond AMP facilities to the locations where we procure products and services.

We aim to protect human rights throughout our business and supply chain. The AMP Responsible Procurement Policy, AMP Social Sustainability Policy and Modern Slavery statement support this goal. We expect our suppliers to respect and enforce our standards and comply with all applicable laws and regulations.

Code of Conduct

The AMP Code of Conduct, and all its accompanying policies, applies to all our directors, officers and employees, as well as all controlled joint ventures. We expect our business partners to adhere to the principles and values in our Code.

Our commitments to respecting human rights within our own workforce are set out in the Own workforce chapter. The AMP Code sets out our respect for the Universal Declaration of Human Rights and our commitment to adhering to and supporting human rights.

For more detail, see Own workforce (pg. 49)

We expect our suppliers to comply with all relevant human rights-related laws. These include those associated with safe working conditions and the prevention of human exploitation through forced labour, child labour and human trafficking. We also have strict guidelines on preventing discrimination and sound environmental management.

Responsible Procurement Policy

The AMP Responsible Procurement Policy sets out our approach to managing topics, including human rights, across our value chain. It outlines the standards we require of our suppliers, including social, ethical and environmental matters, human rights (covering prevention of human exploitation including human trafficking, forced labour and child labour, rights to collective bargaining, fair working conditions, discrimination, the promotion of diversity, harassment and violence, and health and safety.

Our requirements closely follow the Ethical Trading Initiative (ETI) Base Code Principles, which were founded on the conventions of the International Labour Organisation. The Policy also aligns to the United Nations (UN) Guiding Principles on Business and Human Rights.

The AMP Responsible Procurement Policy details how we monitor adherence to our requirements. It also sets out the consequences faced by suppliers not meeting this standard, including cancelled orders or the non-renewal of supplier contracts.

We classify serious misconduct, including the use of child labour and inhumane working conditions, as a material breach of our contracts. We have established internal procedures for supplier human rights and environmental rights due diligence. The Ardagh Group regularly reviews the AMP Responsible Procurement Policy and its associated procedures.

Social Sustainability Policy

The AMP Social Sustainability Policy reinforces our commitment to complying with human rights in the AMP's operating business and supply chains. The Policy details our respect for the Universal Declaration of Human Rights. It also sets out how we identify and address potential human rights issues in our supply chain and support social responsibility in the wider value chain.

ESRS S2: Workers in the value chain continued

Processes for engaging with value chain workers about impacts

S2-2.22(a-e), S2-2-23, S2-2-24

Our responsible procurement risk assessment process addresses actual and potential impacts for value chain workers.

The assessment begins from the time when our representatives are conducting enquiries with the sales representatives and supply chain managers of potential suppliers. The initial supplier risk assessments include human rights, health and safety and environmental rights-related risks.

Selected suppliers may be subject to more in-depth risk assessments. Following onboarding, we may carry out further supplier risk assessments for selected suppliers, depending on the supplier's risk profile.

We regularly assess the effectiveness of our supplier engagement and develop risk mitigation measures if needed. Suppliers may also be required to undergo ethical audits, conducted by a third party.

We have a number of channels where negative impacts on value chain workers are visible. These include our risk assessment process, news monitoring and during supplier due diligence or when third parties approach us with information. Where necessary, we take appropriate preventative measures.

We regularly develop and review the process for assessing suppliers and potential impacts on value chain workers. In 2024, we conducted a full review of the criteria. A dedicated Sustainable Supply Chain Manager works with the AMP's Procurement team to conduct supplier engagement. Our AMP Chief Procurement Officer and the Ardagh Group Compliance Director have ultimate responsibility for these activities.

Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3-27(a-d), S2-3-28, S2-3-29

We adopt appropriate remedies material to address negative impacts affecting value chain workers.

Following the identification of issues with direct suppliers, we implement corrective actions, including improvement plans. We then regularly review the effectiveness of these measures. To gain insights into potential negative impacts and understand appropriate remedies at an industry level, AMP engages with the aluminium associations across the regions we operate within.

The AMP Responsible Procurement Policy and AMP's websites detail our grievance mechanisms. Any AMP employee, value chain worker, supplier or indirect supplier who becomes aware of or suspects any concerns or violations of human rights, environmental rights or other ethical or compliance matters, may raise concerns via our Speak Up Hotline or by contacting the Legal and Compliance team.

Our Speak Up and Whistleblowing Policy

Our Speak Up Hotline, operated by an independent third party, enables individuals to report concerns in a confidential, secure and effective manner, verbally or in writing. Where permitted by local law, concerns may be reported anonymously. Our internal Procedure on Reporting Child Labour and Modern Slavery details indicators for modern slavery – including forced labour and human trafficking. It also sets out the steps to take if it is discovered.

For more information refer to disclosures in Governance (pg. 67)

We are committed to protecting reporters from retaliation as part of our Code and Speak Up and Whistleblowing Policy. AMP will protect all employees submitting a report in good faith against any form of retaliation, discrimination or disciplinary action as a result of such a disclosure. AMP tracks and monitors all reported concerns, with the Audit Committee receiving details on a quarterly basis.

Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

S2-4-32(a-d), S2-4-33(a-c), S2-4-34(a-b), S2-4-36, S2-4-38

All our suppliers must comply with the AMP Code of Conduct and AMP Responsible Procurement Policy.

For more detail see Policies related to value chain workers (pg. 59)

We engage with suppliers throughout our annual risk assessment cycle, analysing risk to identify potential negative impacts in our value chain, such as:

- Forced and child labour
- Fair working conditions
- Workers' rights
- Health and safety

We set out clear expectations to our direct suppliers on expectations for each category. Selected suppliers must participate in detailed risk assessments. This process includes responding to questions about their practices and mitigation measures in place to address potential negative impacts. Examples of our approach are set out in the table below.

Supplier risk assessment overview

Risk area	Example questions asked of selected suppliers
Child labour	Whether they confirm the age of workers as part of their hiring process. If the suppliers hire workers below the age of 18, they are asked to identify the measures taken to ensure their protection.
Fair working conditions	If they pay wages in line with the statutory or industry minimum wage.
Workers' rights	If workers are organised in a union, and whether workers are offered bonuses or other benefits if they are not members of a union.
Health and safety	Whether they have systems to track working time to ensure appropriate breaks and rest periods and are asked about their systems for health and safety management.

ESRS S2: Workers in the value chain continued

Managing risk in our supply chain

Overseen by the Chief Procurement Officer, our Procurement teams continuously work to assess our supply chain, helping to ensure human rights are upheld, together with business continuity. They conduct mapping activities and engage in close dialogue with suppliers. When necessary, suppliers implement improvement plans or corrective actions. The Procurement teams consider multiple factors in their assessments, including the industry, geography and the respective risks of human rights abuses such as modern slavery. They obtain information from multiple sources, including supplier questionnaires, independent risk indices and online media sources.

Detailed supplier risk assessments

By collaborating with suppliers, we ensure appropriate measures are in place to prevent or mitigate against key risks. We ask selected suppliers to occasionally participate in our detailed risk assessments. These consider existing practices and mitigation measures for social issues including modern slavery, together with environmental and health and safety matters. AMP representatives or third parties will conduct on-site ethical audits with a site tour, a review of the site's records and worker interviews.

We prefer third-party audits for suppliers within higher-risk geographies and do not conduct unannounced audits. We focus on suppliers where we can exert the greatest influence and those with a higher-risk exposure, from a social and ethical perspective. We re-evaluate our approach at least every two years. We share assessment outcomes with relevant suppliers and then agree any necessary risk mitigation measures.

Human rights breaches

If we become aware of a heightened potential of human rights breaches, we may introduce additional mitigation measures. In Brazil, where human rights risks are higher, we have initiated regular supplier communications on ethical employment practices and worker safety.

In 2024, we identified potential negative impacts related to human rights, environment and health and safety topics of two organisations in our supply chain. We worked with both suppliers – one direct and the other indirect – to implement action plans to remedy the impacts and prevent future recurrences.

We continue to monitor those suppliers to ensure the measures are effective. AMP did not cause or contribute to those incidents, and no fines, penalties or compensation demands for damages for any such incidents were made to the company.

Human rights governance and training

We annually review our progress and effectiveness in combatting slavery and human trafficking, prioritising actions with the greatest risk and opportunities to our supply chain workers. The Sustainability Committee oversees human rights, and a Sustainable Supply Chain Manager is responsible for monitoring adherence to AMP's Responsible Procurement Policy.

We use a third-party tool to manage and monitor suppliers' human rights risks. This has features to record preventive or corrective actions, and gather news related to suppliers. In addition, we publish annual reports on our activities, such as our Modern Slavery Statement.

The Procurement team undertakes mandatory annual online training regarding our policies, on recognising signs of modern slavery and what steps to take if they encounter it. We have developed and implemented similar training for all of our Human Resources teams and review its effectiveness every year.

Objectives related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2-5-39(a-c), S2-5-42(a-c)

The following objectives for 2025 have been approved by our Sustainability Committee:

- Conduct social and environmental due diligence for 100% of global strategic suppliers
- Conduct training for 100% of category managers on prevention on human exploitation

As part of Ardagh Group, we annually complete the EcoVadis questionnaire, which assesses the quality of Ardagh Group's sustainability management system. In 2024, we achieved Gold, placing us in the top 5% of companies across the areas of environment, labour and human rights, ethics and sustainable procurement.

We conduct social and environmental due diligence on our suppliers of critical categories such as aluminium can sheet and coatings. By doing so we measure their efforts to prevent material negative impacts on the workers in our supply chain. The process also helps us to understand any gaps that we can address through capacity building or collaborating with suppliers or the industry to manage material risks and opportunities.

Our training target measures the number of managers equipped with human rights-related knowledge and their capability to react and respond if they encounter any material negative impacts on workers in our supply chain. We have not engaged directly with workers in the value chain to set these targets.

AMP also aims to achieve Aluminium Stewardship Initiative (ASI) Chain of Custody certification in the future.

Spotlight:

Community action

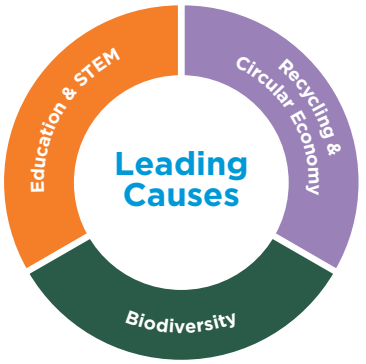
To bring all of our community efforts under one umbrella we launched the Ardagh in the Community strategy, focusing the majority of outreach around three key pillars: Education & STEM, Recycling & Circular Economy, and Biodiversity.

The flagship programme, Ardagh for Education, leads efforts in the education space, creating new opportunities for collaboration across all three themes. As part of Ardagh Group's general volunteering goals, we aim to deliver at least one meaningful Community Involvement Project (CIP) at each Ardagh Group location annually.

This year, Ardagh Group took a regional approach – expanding Ardagh for Education partnerships in Brazil and South Africa, with a focus on educational impact. In North America, AMP and AGP collaborated with Project Lead The Way to develop engaging, hands-on recycling workshops. Across Europe, colleagues explored Biodiversity through activities ranging from tree planting to building community gardens.

Together, more than 1,350 Ardagh Group colleagues contributed ~12,854 volunteer hours – equivalent to 17.5 months – demonstrating our strong global commitment to the communities we serve.

Areas of focus



Total Ardagh Group volunteering hours

~12,854

Ardagh Group colleagues volunteering

~1,350

Image: AMP shot of the students from the local Enzesfeld Volksschule (school) after planting trees at a nearby playground

Spotlight: Community action continued

Recycling and circular economy – Fairfield recycling workshop and facility tour

Our AMP-North America facility teams took on the challenge of delivering new hands-on recycling workshops. Co-created with Project Lead The Way, our enthusiastic teams deepened their connections with the local community with in-school workshops, which were followed up with facility tours for students from the local school.

Fairfield: Students participate in an immersive discussion about careers in manufacturing

Fairfield employees deliver a hands-on workshop and talk about the importance of recycling for National Recycling Day in a local school

Education and STEM – Bringing a splash of colour to a Brazilian school

AMP-Brazil employees were happy to help give a Sao Paulo school a new lease of life via a colourful makeover. Employees attended the Professor Luiz Carlos Maiola Covre Municipal School, in Jacarei, to redecorate the buildings, in partnership with paint supplier PPG. The initiative, which attracted over 150 volunteers, also received support from City Hall and the Department of Education.

Volunteers painting the exterior of the school

Volunteers leave colourful signatures to commemorate this community action

Spotlight: Community action continued

Biodiversity – Celebrating Earth Day with the Austrian community

Our facility in Enzesfeld, Austria marked International Earth Day 2024 by partnering with a local school and community leaders to donate and plant new trees. AMP employees worked with the elementary school children to plant five pollinator-friendly japonica trees at a nearby playground. Eventually reaching 30 metres in height, these trees will provide much-needed summer shade. The event, attended by the mayor and Enzesfeld-Lindabrunn municipal representatives, reflects our commitment to supporting our community and implementing nature-based solutions.

Volunteer planting a tree in the playground

Spotlight:

Ardagh for Education

Increasing STEM skills and opportunities

As a major component of our social pillar, the mission of Ardagh for Education is to give back to the communities we operate in through high-quality Science, Technology, Engineering, and Maths (STEM) education. We aim to upskill teachers and provide students with hands-on, engaging STEM learning experiences that enhance their technical abilities and equip participants with in-demand, 21st century skills. Students are exposed to a variety of exciting STEM activities, such as robotics, coding and IT, engineering design, climate change, recycling, advanced manufacturing and many others.

Additionally, our local employees are engaging with these schools, building relationships with teachers and students, volunteering time in classrooms, and highlighting career opportunities in STEM and our organisation. Some of these students have also joined our internship and apprentice programmes, and it will continue to be an important priority to invest in the next generation of talent in our local communities. This initiative is creating a more diverse STEM pipeline, reaching often overlooked populations, and providing opportunities to young people.

More information on the Ardagh for Education programme can be found at:
ArdaghGroup.com/ardagh-for-education/

Image: Jacarei, Brazil

Spotlight: Ardagh for Education continued

Ardagh for Education Goals

Country	Beneficiaries (students)	Duration (years)	Teacher Training		Partner
			Teachers	Schools	
United States	500,000	10	5,000	2,000	Project Lead The Way (PLTW)
Germany	200,000	10	1,000	300	Wissensfabrik
Brazil	200,000	10	2,500	200	Brazilian Social Service for Industry (SESI)

Image: Jacarei, Brazil
Teachers participating in training in our Jacarei, Brazil community

AMP Ardagh for Education – Results & impact to date:

$5m
Money committed

350+
AMP colleagues volunteered with local schools

275+
Schools

90%*
of participating students indicating improvements in problem-solving, communication, and critical thinking through this programme

20
AMP communities worldwide

95%*
of participating students who are more aware of STEM career paths

600+
Teachers upskilled in STEM

47%*
of participating students who are female

75k+
Students reached with hands-on STEM learning

70%*
of participating students who are underserved

* Survey data aggregated at Ardagh Group level.

ESRS Governance

ESRS G1: Business conduct

AMP is committed to operating with the highest standards of integrity and honesty and to complying with all applicable laws and regulations. Our Board has adopted a Code of Conduct (our Code), which is the framework for achieving these commitments. Our Code outlines our principles and clear expectations regarding what AMP considers to be acceptable behaviour. It is based around core values of Inclusion, Trust, Teamwork and Excellence, and applies to everyone in the business. Our Chair and CEO set a clear tone from the top, promoting our Code and everything AMP stands for.

Business conduct IRO table

ESRS 2 SBM-3-48 (b-c), SBM-3-49

Description of material IRO	IRO category	We manage the IRO by	Value chain location			Time Horizon		
			U	O	D	S	M	L
Corporate culture								
Building trust among employees can lead to a more positive and productive work environment, as well as increased collaboration and innovation.	Positive impact	Proactively engaging with our employees to create a more productive work environment through leadership training. To effectively address the employee engagement survey results, we hold meetings with employees at each location where we discuss the results and design local action plans. We also organise leadership meetings to discuss the results and design action plans at regional and global levels, which we track over time. We communicate the actions taken based on feedback to employees and provide regular updates.		●		●	●	●
Protection of whistle-blowers								
A robust whistle-blower policy can prevent mismanagement, and unethical behaviour within own operations and the supply chain.	Positive impact	Encouraging employees, contractors and any other individuals in our workforce to speak up if they have any concerns. They can speak to their line managers or local Human Resources team – often best-placed to support concerns. We have also established a Speak Up Hotline, where individuals can raise concerns anonymously. An independent third party operates the channel, enabling stakeholders to raise concerns in a confidential, secure and effective manner.	●	●	●	●	●	●
Management of relationship with suppliers								
Customers may be lost if they learn that a manufacturer's suppliers are engaging in unethical practices and if controls are identified as insufficient.	Risk	Together with the contractual obligations requiring suppliers to follow ethical practices, AMP has established and implemented an ethical due diligence and risk assessments procedures for its supply chain.	●	●	●		●	

ESRS G1: Business conduct continued

The role of administrative, management and supervisory bodies

ESRS 2 GOV-1-21 (a-e), GOV-1-22 (a-d), GOV-1-23(a-b), G1-5 (a-b)

As of year-end 2024, the AMP Board had eight members, five of whom were non-executive directors – meaning not employed by AMP or any of our affiliates. All five of its non-executive directors were independent – representing 63% of the Board – according to the corporate governance standards of the New York Stock Exchange.

There have been changes to our Board in 2025. As of 27 May 2025, our Board had nine members. The number of non-executive directors and independent directors remained unchanged from year-end.

In accordance with Ardagh Metal Packaging S.A. Articles of Association, the Board must have at least three, and no more than 15 directors. The holders of Ardagh Metal Packaging S.A.'s ordinary shares have the right to elect the Board members at a general meeting of shareholders by a simple majority of the votes validly cast. The existing directors have the right to appoint persons to fill vacancies on the Board and such persons may hold office until the next following annual general meeting of shareholders. None of the Board members are elected by employees.

Biographical information on each Board member, including relevant experience in sectors, products and geographic locations, is presented in our 2024 Annual Report. Currently, the Board members consist of two women and seven men.

Ardagh Metal Packaging S.A. is a Luxembourg public limited liability company (Societe Anonyme) and is subject to the Luxembourg law of 10 August 1915 pertaining to commercial companies, as amended from time to time. AMP's business is managed and conducted by (or under the direction of) our Board, which is AMP's ultimate decision-making body (except for those matters reserved to or shared with the shareholders). The Board's responsibilities are set out in Ardagh Metal Packaging S.A.'s articles of association.

Our executive officers are appointed by the Board to serve in their roles. Each executive officer is appointed for such term as may be prescribed by the Board or until a successor has been chosen and qualified or until such officer's death, resignation or removal. The Board has five standing committees (the Committees): the Audit Committee, the Compensation Committee, the Nomination and Governance Committee, the Sustainability Committee and the Finance Committee. The members of each Committee are appointed by the Board and serve until their successors are elected and qualified – unless they are removed or they resign.

Each Committee reports to the Board as it deems appropriate, and as the Board may request. The composition, duties and responsibilities of the five standing Committees is presented in our 2024 Annual Report. In the future, the Board may establish other committees, as it deems appropriate, to assist it with its responsibilities.

Each Committee has its own charter. The Committee charters, as well as Ardagh Metal Packaging S.A.'s Articles of Association, are available in the Governance section of our website. In addition, the Board has adopted corporate governance guidelines that serve as a flexible framework within which the Board and its Committees operate.

Skills and expertise to oversee sustainability matters

The Nomination and Governance Committee selects and recommends nominees for election by our shareholders or appointment to the Board. Among other matters, it reviews Board member composition for characteristics such as independence, knowledge, skills, experience and diversity. In addition, the Board and certain Committees, including the Sustainability Committee, perform an annual self-evaluation focusing on the composition and competencies of, and results achieved by, the Board and such Committees.

We believe that the composition of the Board, which includes a broad spread of nationalities, backgrounds and expertise, provides the breadth and depth of skills, knowledge and experience that are required to effectively lead an internationally diverse business with interests spanning three continents and nine countries. Biographical information on each Board director, is in the AMP Annual Report. In addition, the Board may draw on external expert advice. The Board is responsible for ensuring that the Committees and management team have appropriate skills and expertise relating to ESG matters – including material impacts, risks and opportunities.

Role and expertise related to business conduct

The Board and the Audit Committee play a key role in monitoring, evaluating and strengthening APM's business conduct and corporate culture. The Board has adopted a Code of Conduct, which establishes the standards of ethical conduct applicable to all our directors, officers and employees. Any amendments to the Code must be approved by the Board.

The Audit Committee is responsible for, among other matters, AMP's internal control activities and compliance with legal and regulatory requirements. This includes taking actions necessary to enforce the Code, including establishing procedures to consider alleged violations of such codes, reporting and disclosure of such violations (including reviewing quarterly reports prepared by the compliance committee) and any waivers granted by the Board under such codes.

The Audit Committee has established a compliance committee to drive the implementation of the Code and ensure that AMP has appropriate policies to address compliance risks. The compliance committee includes representatives from across the business and is responsible for reviewing compliance violations and reporting these to the Audit Committee.

The Ardagh Group Compliance Director, who is part of the Ardagh Group Legal team and reports directly to the Ardagh Group Chief Legal Officer, manages topics related to the Code. These include anti-corruption, prevention of bribery and protection of whistleblowers. The Audit Committee receives quarterly updates on material fraud incidents and compliance cases – including those related to business conduct, including any submissions to our Speak Up Hotline.

ESRS G1: Business conduct continued

Sustainability matters addressed by the administrative and supervisory bodies

ESRS 2 GOV-1-21 (a-e), GOV-1-22 (a-d), GOV-1-23 (a-b), G1-5 (a-b), GOV-2

Information related to sustainability matters is provided to the Sustainability Committee at least four times a year, and to the full Board on at least an annual basis. These matters include sustainability-related regulatory changes and evaluation of the impacts, risks and opportunities related to our sustainability strategy and major corporate actions.

For more detail, see Our administrative, management and supervisory bodies (pg. 69)

For more detail, see 2024 Progress to Targets (pg. 8)

Members of management, including our Chief Sustainability Officer, attend the Sustainability Committee meetings. Our Sustainability team engages with a diverse range of stakeholders, including employees, customers and industry organisations to understand their sustainability priorities and expectations, to inform our decision-making processes.

Management and other members of the Sustainability team provide regular updates to the Sustainability Committee regarding significant sustainability issues that could impact our business and stakeholders, as well as updates on the implementation of our sustainability strategy. In addition, sustainability topics are annually discussed with the full Board as part of management's update on our ESG strategy, performance and reporting.

In accordance with its charter, the Sustainability Committee periodically reviews AMP's performance against its publicly disclosed sustainability targets. These targets evaluate effectiveness in managing material impacts, risks and opportunities; see Double materiality assessment for more information. The Sustainability Committee also reviews and discusses with management any proposed sustainability targets, or changes to existing publicly disclosed sustainability targets and recommends such changes to the Board for review and approval.

For more detail, see Double materiality assessment (pg. 9)

Integration of sustainability-related performance in incentive schemes

ESRS 2 GOV-3.-7, E1

As of 31 December 2024, the incentive schemes and remuneration policies for members of management and the Board were not directly linked to sustainability matters, targets or impacts.

Risk management and internal controls over sustainability reporting

ESRS 2 GOV-5-36(a-e)

Our climate-related risk management is integrated into a multi-disciplinary enterprise risk management (ERM) process.

The ERM Committee oversees risk management activities across AMP and reports to the Audit Committee. To help mitigate risks and promote clear controls in reporting, the Chief Sustainability Officer, the Ardagh Group Legal team and the Sustainability Committee (which includes members of executive management) review AMP's sustainability report. In addition, we have established ESG working groups that report to the Chief Sustainability Officer and the Sustainability Committee. Multi-functional teams are responsible for interpreting ESG reporting requirements such as CSRD and ensuring a standardised approach across all reporting components.

We have identified potential risks in the sustainability reporting process and implemented targeted risk mitigation strategies as follows:

- **Data completeness and quality:** We have adopted a sustainability reporting software tool to enhance data efficiency, automation and standardisation. We are strengthening our reporting processes through active engagement with data owners, training sessions and increased awareness of reporting requirements. We are also implementing controls and multiple levels of review to ensure data integrity. The sustainability reporting team provides ongoing support and conducts internal checks to verify the accuracy and completeness of collected data.
- **Data source variability:** We continuously monitor our data collection systems and processes for consistency across different sources. We are developing customised data collection methods tailored to specific operational environments, helping to ensure consistent and reliable input from all sources.
- **Systems and process alignment:** although we rely, in part, on manual data gathering methods, our new ESG software system centralises and automates sustainability reporting. We continue to streamline and integrate reporting processes.

Business conduct policies and corporate culture

G1-1-10 (a-h) ex. (d-f)

The Code of Conduct covers corporate culture and business conduct.

The Code includes commitments and expectations on:

- Acting ethically and with integrity
- Not taking unfair advantage of anyone, whether through manipulation, concealment, abuse of confidential information, misrepresentation or any other unfair practice
- Bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Corporate opportunities
- Accurate financial reporting
- Insider trading
- Competition and anti-trust compliance
- Sanctions and export control laws

Anyone who sees or suspects a violation of our Code, or of the law, is encouraged to speak up, raising their concerns either directly with line management, HR team or Ardagh Group Legal team, or reporting via our Speak Up Hotline, see page 59 for details. A failure to comply with the Code, policies or applicable laws may result in disciplinary action, which may include the termination of employment.

ESRS G1: Business conduct continued

In addition to the Code, our Anti-Bribery and Corruption Policy sets out our zero-tolerance approach to bribery and corruption. It also details the procedures intended to support compliance with anti-bribery and corruption laws, including the US Foreign Corrupt Practices Act and the UK Bribery Act. We encourage anyone who suspects or identifies bribery or corruption to raise this – by reporting concerns either directly to Ardagh Group's Compliance Director or on an anonymous basis through the Speak Up Hotline. All concerns are strictly confidential and investigated appropriately.

Our Conflicts of Interest Policy sets out how we ensure our decision-making processes are not influenced by undue personal interests. Where there are any conflicts of interest, we ensure these are disclosed, reviewed and recorded, improving transparency and safeguarding the integrity of AMP and our employees.

Protection of whistleblowers

AMP is committed to ensuring that those reporting suspected violations of the Code of Conduct in good faith are protected against any form of retaliation or discrimination. The Speak Up Hotline helps employees to raise concerns anonymously, in a confidential, secure and effective manner. It is operated by an independent third party and has restrictions to ensure that access to each case is limited to people investigating it.

Reports received via the Speak Up Hotline are handled by qualified investigators, in accordance with the Speak Up and Whistleblowing Policy.

All employees receive training on speaking up, including how to use the Speak Up Hotline and our commitment to protect reporters from retaliation or discrimination. The Speak Up programme, including a Speak Up and Whistleblowing Policy and Speak Up Hotline, comply with legal requirements under relevant national laws and conform to the EU Whistleblowing Directive (Directive (EU) 2019/1937).

Business conduct training

All our employees are trained on business conduct, including the AMP Code of Conduct and how to speak up and raise concerns. In 2024, we rolled out a new business and ethics compliance training programme for all employees. In addition to courses on the Code and speaking up, the programme covers conflicts of interest, privacy and fraud prevention.

The anti-bribery and corruption elements include enhanced training for those in roles most at risk such as Sales and Procurement positions.

Managing supplier relationships

G1-2-15 (a-b)

AMP's procurement strategy seeks to build a strong future and for the organisation to become a leader in sustainability.

Responsible procurement

AMP's Procurement team actively supports our sustainability goals by working with suppliers who are committed to fair and responsible practices within their own businesses and supply chains. The AMP Procurement Policy informs our Code of Conduct. We have been reviewing ways of working and how to provide employees with new skills – a process that is continuing in 2025.

All AMP procurement activities comply with relevant laws and regulations where we operate and source from – including laws on taxation, environmental regulations, employment, health and safety, and corruption. Our procurement procedures encourage supplier diversity and, where appropriate, the development of small suppliers, start-up companies, local suppliers and minority-owned businesses.

Our General Terms and Conditions and bespoke contractual arrangements reference the AMP Code of Conduct and AMP Responsible Procurement Policy. This helps ensure that we engage with suppliers and contractors who subscribe to our business conduct principles. Sourcing Councils validate significant sourcing decisions according to business needs and the Responsible Procurement Policy.

As part of our category management principles, within our Responsible Procurement Policy, we assess category-specific risk and opportunities: from supply continuity to innovations with suppliers. The objectives, corresponding business initiatives and measurements will be agreed with the business going forward. We also engage with Risk Domain Owners to implement risk management procedures (see our Third-Party Risk Management Policy). In 2025, AMP will launch a strategy refresh of its core categories.

Partnering with our suppliers

AMP has established partnering programmes with our key strategic suppliers of core categories. These have created strong relationships that extend beyond transactional engagement, and which will drive future business growth. As part of each partnering programme, we identify initiatives ranging from operational improvement to jointly building sustainable product offerings. We also engage and collaborate with suppliers to better understand risks and opportunities in the supply chain.

HREDD compliance with our suppliers

AMP operates a HREDD (Human Rights and Environmental Due Diligence) programme, as detailed in the AMP Responsible Procurement Policy. It enables the assessment and management of HREDD risks in our supply chain. The HREDD programme includes training for employees, including Procurement teams, on identifying risks within supply chains and how to conduct due diligence on suppliers. Regular internal reviews and assessments support organisational learning and progress to objectives.

Appendix

ESRS 2 General disclosures – supplementary content

Value chain reporting

BP-1-5(c)

This sustainability report has been prepared with consideration of our upstream and, to a more limited extent, downstream value chain activities, in addition to our own operations.

Our carbon footprint reporting follows a cradle-to-gate system boundary and so does not include downstream emissions beyond AMP's operational control. We have limited downstream data beyond our cradle-to-gate system boundary but will continue to evaluate this as we evolve our stakeholder expectations and data availability.

Our assessment of IROs covers the whole value chain. We have considered different value chain impacts when defining relevant targets, metrics and actions. As examples of value chain considerations, our GHG target covers sources of emissions from AMP's own operations, as well as our upstream value chain activities.

Exemptions and omitted information

BP-1-5(d-e)

We have not omitted any information relating to intellectual property and know-how. The report excludes all matters in the course of negotiation, unless publicly disclosed and deemed relevant to report.

General approach to identifying material IROs

Methodology and assumptions

IRO-1-53(a)

The Double materiality assessment (DMA) was conducted in accordance with the guiding principles outlined in EFRAG's Implementation Guidance for Materiality Assessments (IG 1) and ESRS 1 (General Requirements).

The process assessed both impact materiality and financial materiality, determining our reporting obligations. In identifying the IROs, we considered all sub-subtopics outlined in ESRS 1.

For inside-out impacts – those on people and the environment – the DMA addressed both positive and negative effects, considering actual and potential sustainability-related impacts. For the outside-in financial perspective, the DMA evaluated sustainability-related risks that could negatively affect our business, as well as opportunities that could provide financial benefits.

The assessment covered both our operations and those arising from our business relationships and value chain. While the value chain analysis primarily focused on first-tier suppliers, the DMA also drew on broader industry-wide assessments, sector-specific knowledge and internal insights gained through participation in relevant forums.

We paid particular attention to the upstream value chain, especially raw materials sourcing and geographic regions, which may present elevated risks – including the potential adverse human and labour rights issues and environmental impacts, that reflect the inherent risk profile of the can making industry.

Process to identify, assess, prioritise and monitor IROs

IRO-1-52 (b-h)

Our assessment approach included the following steps:

Understanding the context

Key business relationships

Our business success is closely tied to relationships with key stakeholders, including customers, suppliers, employees, communities, investors and industry associations. These relationships form the foundation of our operational and strategic approach, helping to deliver long-term value and sustainable growth.

The brand owners we sell to are critical to our performance. To mitigate risks associated with customer concentration, we focus on delivering high-quality, consistent products, as well as providing added value through innovation, customer service and sustainability initiatives. Strong supplier partnerships support our ability to meet customer expectations and maintain supply chain resilience.

Affected stakeholders

Our operations have significant social and environmental impacts affecting a range of stakeholders, including employees, customers, suppliers, communities, regulators, investors and industry associations. These impacts range from job creation and economic contributions to environmental considerations such as GHG emissions and the potential for disturbances in local communities. We are conscious of our influence and committed to responsible business practices that minimise negative impacts and maximise positive outcomes.

We see strategic value in taking a more active role in industry associations. By leading collaborative initiatives, we aim to help advance sustainability for the metal packaging industry – helping to shape a more sustainable future at the local, regional and global levels. This proactive engagement not only reinforces AMP's sustainability commitments but also serves as a competitive differentiator in the marketplace.

Peer benchmarking

We conducted peer benchmarking to evaluate how our material topics align with the priorities of both customers and competitors. The exercise analysed sustainability disclosures, ESG strategies and reporting practices of key industry peers and major customers. The results provided valuable insights into sector-wide expectations, emerging risks and best practices. They also helped us to identify gaps and opportunities in our ESG approach, helping to align with stakeholder expectations and remain competitive within the packaging industry.

Identification of IROs

Review of existing work

In 2023, Ardagh Group undertook a materiality analysis which followed the Global Reporting Initiative (GRI) guidelines. During 2024, we engaged an external consultant to carry out a comprehensive DMA in line with the ESRS requirements, which also leveraged insights from the existing 2023 GRI-based assessment.

Topic definitions

To help meet the CSRD requirements, Ardagh Group developed company-specific definitions for all ESRS topics, subtopics, and sub-subtopics across the ESG pillars outlined in ESRS 1, paragraph AR16. These definitions reflected the specific relevance and materiality of each topic to our operations, value chain and strategic objectives. To ensure accuracy and alignment with company priorities, the

Appendix continued

project team reviewed the drafted topic definitions and validated them through consultation with senior management. This collaborative approval process was critical, and the resulting topic definitions informed the subsequent phases of our sustainability reporting and DMA. Together, they helped to provide ESG disclosures that are meaningful and comply with regulatory expectations.

Identified IROs

We developed a comprehensive list of relevant IRO topics, encompassing both actual and potential impacts – positive and negative – across environmental, social, and governance dimensions. This included impacts directly caused or contributed to by AMP, as well as those indirectly linked to us through upstream and downstream value chain relationships. In addition to impacts, the exercise identified and assessed potential risks that could have a negative financial impact on the business. The initiative also examined opportunities with the potential to generate positive financial outcomes. The project team mapped each IRO to the specific stages of our value chain where it occurs, providing a clear understanding of origin and reach. To ensure a forward-looking approach and inform effective sustainability strategy and risk management planning, we also evaluated the IROs across short-, medium- and long-term time horizons.

IRO review

Members of Ardagh Group's senior management team with topical expertise and knowledge of our operations and strategic priorities reviewed the draft list of IRO topics. Many of these individuals were actively involved in the DMA process, supporting consistency, accuracy and relevance in identifying and evaluating IROs.

Engaging senior management in this review was essential to validate the completeness and accuracy of the IROs. It also helped to ensure that the outcomes of the assessment were aligned with our business context, stakeholder expectations and regulatory obligations. This collaborative engagement fostered cross-functional insights and strengthened internal ownership of sustainability topics. It also helped in delivering a final IRO list that is robust, balanced and reflects both internal expertise and external sustainability imperatives.

Obtaining additional stakeholder insights

To enhance the DMA, we incorporated elements from the previous 2023 GRI materiality approach. This including direct engagement with key internal functions through stakeholder interviews. These conversations helped to surface ESG-related perspectives, concerns and expectations across the organisation.

To gather a comprehensive understanding of material IROs, the project team also sought input from a broad range of external stakeholders. Ongoing engagement, particularly with the communities where Ardagh Group operates, continues to provide insights and strengthen the credibility of the assessment.

To reduce potential bias and address knowledge gaps, we encourage active collaboration between internal and external stakeholders. When applying the materiality scoring criteria, we exercised professional judgment and used publicly available evidence on the occasions when direct input was not available.

Assessment and determination of IROs

Scoring methodology

Impact materiality

For the assessment of impact materiality, we evaluated each ESRS topic based on the calculated severity and likelihood.

Severity was determined using:

- **Scale:** Considers the gravity of the negative impact or the benefit of the positive impact on people or the environment
- **Scope:** Assesses how widespread the impact is
- **Remediability:** Applies to negative impacts only and evaluates the extent to which the impact can be mitigated or reversed

Likelihood was assessed by taking into account historical occurrences, current initiatives and existing preventative measures – all grounded in our risk management practices. For consistency, reliability and relevance to our operational context, we aligned the assessment criteria with our established risk management framework wherever possible.

Financial materiality

In line with ESRS standards, we determined the financial materiality of a risk or opportunity by evaluating two factors: the potential magnitude of its financial impact on the business and the likelihood of its occurrence.

Magnitude reflects the size of the financial effect.

Likelihood considers the probability of the risk or opportunity materialising (applicable to potential impacts only), using parameters consistent with AMP's Enterprise Risk Management (ERM) framework.

Although the ESRS does not prescribe a standard grading scale for assessing financial impact, we adopted a 0–5 point scale that aligned to our existing financial risk thresholds used in internal reporting. This approach supported consistency with our established risk management practices and provided a structured, comparable basis for evaluating financial materiality.

Defining materiality thresholds

We established quantitative thresholds for both impact and financial materiality to determine matters that are considered material for reporting purposes. These thresholds were reviewed and validated in collaboration with our senior management team to ensure alignment with our priorities and reporting requirements.

Assessing IROs for materiality

Building on research from a gap assessment – drawing from a wide range of both internal and external documentation – we used a dedicated scoring tool to capture the rationale behind each assessment. We used this to assign preliminary scores across all identified IROs, according to the established methodology. These preliminary results determined materiality from the perspective of impact materiality, financial materiality, or both, depending on how each topic scored against the defined thresholds.

Once preliminary results were available, we engaged with relevant subject matter stakeholders, senior management, and the AMP's Finance and Risk teams to discuss, review and refine findings. Based on the insights and additional evidence, the team adjusted the initial scores (where necessary) to ensure accuracy and alignment with our operational realities. Following these revisions, we compiled draft results and presented them to senior management for final confirmation and approval.

Validation and reporting

The project team engaged workshop participants to validate the results. For any adjustments, the responsible subject matter expert provided a clear and documented rationale, ensuring transparency and traceability of all changes. The validated results of the DMA were then confirmed through an online workshop with our senior management team, providing an opportunity to review, discuss and challenge the findings. The final validated outcomes established our material sustainability topics and corresponding reporting obligations under the CSRD.

Appendix continued

Reporting frameworks and standards

BP-2-15

We have prepared this report to provide stakeholders with transparent and relevant information on our ESG performance for the reporting period ending 31 December 2024. As of the date of this report, the European Union's (EU) new CSRD and the related ESRSs are scheduled to apply from 2028 (on year 2027 information).

Although CSRD is not currently in force with respect to Ardagh Group, we have proactively begun aligning our reporting practices with the CSRD and ESRS. Therefore, while this report is not fully CSRD-aligned, we have developed it with the goal of integrating the current CSRD and ESRS structure to the extent practicable.

However, the CSRD and ESRS are currently subject to an ongoing legislative review and therefore such requirements, as well as our own approach to sustainability reporting, may continue to evolve. Additionally, we follow standardised reporting frameworks, including the Greenhouse Gas Protocol, for our ESRS E1 disclosures on GHG emissions.

Data in this report is based on our internal monitoring systems, external verification (where available) and best estimates in areas where precise measurement remains challenging. This report outlines why sustainability is relevant to AMP's business as well as our priorities and decarbonisation roadmap to 2030, how we measure progress and our approach to managing our goals.

We publish information on our economic performance in our annual financial reports and in our quarterly interim financial reporting. This report affirms our commitment to the United Nations Global Compact (UNGC) and is a supplement to our Communication on Progress (COP), which we completed in September 2025.

Extent the sustainability report covers our value chain

BP-1-5 (c)

We have limited downstream data beyond our cradle-to-gate system boundary but will continue to evaluate this as we evolve our stakeholder expectations and data availability. Our assessment of IROs covers the whole value chain.

Each chapter features an IRO table disclosing our assessments of IROs for each subtopic. We have considered different value chain impacts when defining relevant targets, metrics and actions. As examples of value chain considerations, our GHG target covers sources of emissions from our own operations, as well as our upstream value chain activities.

Disclosures in relation to specific circumstances

BP-2-9(a-b)

Time horizons

In this report, we define time horizons as: short-term – up to 1-year; medium-term – 1-5 years; long-term – 5+ years.

Value chain estimation

BP-2-9(a-d)

We conduct annual reviews of estimates and judgments used in our reporting. If primary, supplier-specific data is unavailable, we use estimated data for selected upstream and downstream Scope 3 emissions categories. We prepare these estimates in accordance with the GHG Protocol and ESRS guidance as of the date of this report and apply them to the following Scope 3 categories: purchased goods and services; fuel and energy-related activities; upstream transportation and distribution; and waste generated in operations.

To ensure consistency and transparency in the approach, we follow a tiered estimation hierarchy. First, we apply the most recent emissions factors provided by suppliers or business partners. If current supplier-specific emissions factors are unavailable, the team relies on the latest previously provided data. When neither current or historical company-specific factors exist, we default to sector or region-specific emissions factors from recognised external databases, such as DEFRA or Ecoinvent. We apply the appropriate methodological approach for each activity. These may include adopting supplier-specific methods, utilising average product emissions, or making distance-based calculations.

This estimation framework supports traceable, methodologically consistent Scope 3 reporting, and is aligned with AMP's CDP Climate Change disclosure. As data quality improves and supplier engagement increases, we aim to progressively reduce reliance on secondary data sources.

We are actively improving the accuracy of our value chain-related sustainability data, with a particular focus on Scope 3 emissions, where primary or supplier-specific data can be limited. Planned actions include expanding direct engagement with upstream suppliers to improve data availability for categories such as purchased materials, fuel- and energy-related activities, and transportation.

We are also investing in digital infrastructure to enhance data traceability, validation and integration across the supply chain. We have implemented ESG data management platforms such as Tagetik and Osapiens, which we expect to improve data granularity, reduce reliance on proxy values and support audit readiness.

Appendix continued

Sources of estimation and outcome uncertainty

BP-2-11(b)

Quantitative metrics disclosed in this report may include measurement uncertainty due to data quality, availability and a reliance on estimation techniques. Where primary data is unavailable, we use assumptions based on prior-year data, sector averages, or supplier engagement – such as DEFRA emission factors for Scope 3 calculations and standard conversion factors for estimating raw materials usage. We review these assumptions and proxies annually and maintain internal documentation to support transparency and consistency. In this report, we have not identified any metrics with a high level of uncertainty.

Material errors

BP-2-14(a)

We have not identified any material errors in prior sustainability disclosures that require correction or clarification in this reporting cycle. This is AMP's first CSRD-referencing report, and previous sustainability reports, including those provided to CDP and other frameworks, have not been restated for error correction purposes.

Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

This sustainability report is aligned with selected elements of frameworks, including the UN Global Compact principles and voluntary submissions to CDP for climate and water reporting.

Material impacts, risks and opportunities and their interaction with our strategy and business model

SBM-3

The IRO tables included in the relevant chapters present those identified and assessed as material in the DMA, rated as either 'crucial' or 'significant' materiality. Each ESRS topic is accompanied by relevant subtopics. For example, under ESRS E1 Climate change, subtopics include 'climate change mitigation', 'climate change adaptation' and 'energy'. Each table includes brief descriptions of the material IROs, along with an indication of whether they relate to our own operations (OO) or value chain (VC). For impact-related IROs, the table also indicates whether the impact is positive (+) or negative (-). Further detail on each IRO, including the management approach is in the relevant sections under Environment, Social, and Governance.

Appendix continued

Disclosure requirements – codes and descriptors

IRO 2.56

Disclosure reference	Description	Page number
ESRS 2		
BP-1	General basis for preparation of the sustainability report	3
BP-2	Disclosures in relation to specific circumstances	75
GOV-1	The role of the administrative, management and supervisory bodies	69
GOV-2	Information provided to and sustainability matters addressed by AMP administrative, management and supervisory bodies	70
GOV-3	Integration of sustainability-related performance in incentive schemes	70
GOV-5	Risk management and internal controls over sustainability reporting	70
SBM-1	Strategy, business model and value chain	7
SBM-2	Interests and views of stakeholders	11
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	10
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	73
IRO-2	Disclosure Requirements in ESRS covered by AMP's sustainability report	77
E1		
E1-1	Decarbonisation roadmap for climate change mitigation	17
E1-2	Policies related to climate change mitigation and adaptation	18
E1-3	Actions and resources in relation to climate change policies	19
E1-4	Targets related to climate change mitigation and adaptation	20
E1-5	Energy consumption and mix	23
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	24
E1-8	Internal carbon pricing	26
E2		
E2-1	Policies related to pollution	30
E2-2	Actions and resources related to pollution	31
E2-3	Targets related to pollution	32
E2-4	Pollution of air, water and soil	30

Appendix continued

Disclosure reference	Description	Page number
E3		
E3-1	Policies related to water and marine resources	35
E3-2	Actions and resources related to water and marine resources	35
E3-3	Targets related to water and marine resources	37
E3-4	Water consumption	37
E4		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	39
E4-2	Policies related to biodiversity and ecosystems	40
E4-3	Actions and resources related to biodiversity and ecosystems	40
E4-4	Targets related to biodiversity and ecosystems	40
E5		
E5-1	Policies related to resource use and circular economy	42
E5-2	Actions and resources related to resource use and circular economy	43
E5-3	Targets related to resource use and circular economy	43
E5-4	Resource inflows	45
E5-5	Resource outflows	46
E5-6	Anticipated financial effects from material resource use and circular economy-related risks and opportunities	47
S1		
S1-1	Policies related to own workforce	51
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	52
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	53
S1-5	Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	49
S1-6	Characteristics of Ardagh Group's employees	53
S1-8	Collective bargaining coverage and social dialogue	54
S1-9	Diversity metrics	55
S1-10	Adequate wages	55
S1-11	Social protection	55
S1-12	Persons with disabilities	55
S1-13	Training and skills development metrics	56

Appendix continued

Disclosure reference	Description	Page number
S1-14	Health and safety metrics	56
S1-15	Work-life balance metrics	56
S1-16	Remuneration metrics (pay gap and total remuneration)	55
S1-17	Incidents, complaints and severe human rights impacts	57
S2		
S2-1	Policies related to value chain workers	59
S2-2	Processes for engaging with value chain workers about impacts	60
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	60
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	60
S2-5	Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	61
G1		
G1-1	Business conduct policies and corporate culture	70
G1-2	Management of relationships with suppliers	71

ArdaghMetalPackaging

ardaghmetalpackaging.com