

Ardagh Metal Packaging Modern Slavery and Human Trafficking Statement

Introduction

This statement is made by Ardagh Metal Packaging S.A. (AMP) and all relevant subsidiaries pursuant to their obligations under both section 54(1) of the Modern Slavery Act 2015 and the California Transparency in Supply Chains Act.¹ This statement sets out the steps we have taken to combat modern slavery in both our own organisation and in supply chains during the year ending December 31, 2021.

In this statement, the term “modern slavery” is inclusive of all forms of modern slavery, including human trafficking, forced labour and child labour.

Organisational structure and supply chains

Ardagh Metal Packaging (AMP) is a leading global supplier of sustainable, infinitely recyclable, metal beverage cans to brand owners.

As at 31 December 2021, AMP operated 24 production facilities in 9 countries (in Europe, the US and Brazil), employing approximately 5,800 personnel, and with annual sales of \$4.1bn.

AMP supports the presence of Works Councils or other types of collaboration and engagement with work force representatives across the globe. A European Works Council is in place and for some regions, collective agreements have been signed including provisions on working conditions and remuneration.

Our main inputs include energy, raw materials, consumables, components, packaging and logistics. Most of these inputs are sourced within the European Union, US and Brazil.

Our procurement strategy is to promote long term business relationships and, where possible, to conduct business directly with suppliers and manufacturers to ensure the materials and services we source are ethical from origin.

¹ This statement covers all Ardagh Metal Packaging companies worldwide, including Ardagh Metal Packaging UK Limited, Ardagh Metal Packaging Trading Limited and Ardagh Metal Packaging Holdings UK Limited.

Our key policies

We are committed to ensuring modern slavery does not exist within our business and supply chain. We have two key documents to support this commitment:

1. our Code of Conduct; and
2. our Responsible Procurement Policy.

Code of Conduct

Our Code of Conduct includes our Social Sustainability Policy, detailing our commitment to human rights, and our Employment Policy, which sets out our fundamental employment principles and rights for employees (including rights of freedom of association and collective bargaining).

Our Code of Conduct encourages all staff to report any concerns relating to non-compliance with laws, either directly to management or through our Compliance Hotline on an anonymous basis, without fear of retaliation or discrimination. The hotline is accessible online or by telephone.

The Code of Conduct is signed off by the Board of Directors of Ardagh Metal Packaging S.A. and it is available to all employees in local languages on Ardagh's intranet internal portal, as well as publicly on the AMP website ([link](#)).

Responsible Procurement Policy

Our Responsible Procurement Policy outlines the standards we require of our suppliers, including as regards social, ethical and environmental matters, including modern slavery. The policy sets out how we monitor adherence to our requirements (based predominantly on the Ethical Trading Initiative Base Code principles) and the consequences of a supplier not adhering to all requirements. We review our policy and its associated procedures on an annual basis. The policy is available on the AMP website ([link](#)).

Additionally, in order to reduce the risks of human trafficking and migrant smuggling, Ardagh's hauliers and logistics providers are required to follow specific procedures to ensure that goods are secured and sealed.

Our approach to supply chain verification and audit

Assessing and managing risk

We have implemented a risk-based management system, which helps us identify and manage potential social, ethical, and environmental risks, including modern slavery risks, across our supply chain. We note that our verification of supply chains continued throughout 2021.

Desktop risk assessment

Each year we choose a selection of suppliers to conduct an internal risk assessment on. We take multiple factors into consideration when deciding which suppliers to focus on, including industry, geography and their respective risk of human rights abuses (such as modern slavery).

The risk assessment considers relevant information from multiple sources including independent risk indices, information provided by suppliers via a mandatory online questionnaire and online media sources. Suppliers are reassessed on a rotational basis. The frequency of reassessment, which is between 1 to 3 years, is determined by the outcome of the previous risk assessment.

Since 2021, we have shared the outcome of the risk assessments with suppliers to improve risk mitigation measures.

Onsite Assessments & Third-Party Audits

Based on the outcome of the desktop risk assessment, a supplier may be required to undergo, either an on-site assessment conducted by one of our representatives, or an ethical audit by a third-party, both of which cover social (including modern slavery), environmental and health and safety elements. We consider third-party audits to be preferential for suppliers within higher risk geographies. We do not currently conduct unannounced audits. Both the audit and on-site assessment typically consists of a site tour, records review and worker interviews. In 2021, assessments were all undertaken on a desktop basis, as site visits were not practical due to COVID-19 and the need to minimise travel and contact.

Certification

Through the incorporation of AMP's Code of Conduct and Responsible Procurement policy in AMP's General Terms and Conditions of Purchase, we ensure that our suppliers respect and enforce our standards, to comply with all applicable laws and regulations and take appropriate steps to ensure there is no modern slavery in their business.

Our approach to accountability

Our Code of Conduct, and all its accompanying policies, apply to all our staff worldwide, all AMP companies, all joint ventures controlled by AMP and all third parties working on our behalf.

All our staff are aware of our Code of Conduct and their obligations, and, on employment, certify that they have read, understood and agree to comply with the Code of Conduct. In addition, we require certain staff to participate in an annual certification process, including training to raise awareness of specific topics covered by the Code of Conduct.

We encourage all staff to report any concerns, including those regarding modern slavery, either to local management or through Ardagh's Compliance Hotline.

In the event of any violations of our Code of Conduct, we take appropriate disciplinary actions in accordance with applicable law, which may include termination of employment. A compliance committee, established by the board of Ardagh Metal Packaging S.A., is responsible for the implementation, enforcement and monitoring of the Code of Conduct.

Our Responsible Procurement Policy applies to all our procurement activities. This policy outlines requirements for our suppliers regarding key social, ethical and environmental topics. Non-adherence may result in cancellation or non-renewal of contracts with suppliers. Serious misconduct, including the use of child labour and inhumane working conditions, is classified as a material breach of our contracts. Our Sustainability team, with support from the procurement team, is responsible for monitoring adherence to our Responsible Procurement Policy.

Impact of COVID-19

AMP does not consider that COVID-19 has resulted in any notable change to the risk of modern slavery within its business or supply chain. AMP has continued with its risk-based management systems approach to supply chain verification and assessment, although we have been limited in our ability to undertake onsite assessments or require them to be undertaken by third parties.

As regards the impact on AMP's business and its workers, we are committed to keeping our workers safe during the pandemic. AMP has established a COVID-19 steering committee supported by a COVID-19 working group to establish policies and procedures to keep all our workers safe during the pandemic. AMP has adopted social distancing measures and other precautions in all its sites. All employees are required to follow the procedures for hand washing, social distancing and coughing/sneezing etiquette at all times. We encourage all of our employees to avail of opportunities for vaccination. Home office working was encouraged wherever possible. This also applies to our contractors.

Training

Our procurement team undertake annual online training about company policies, to recognize signs of modern slavery and steps to take if they encounter such situation. We are planning to deploy training with case studies specific to our human resource team. In the future, we are planning for this training to be deployed to employees in other relevant departments.

Responsibility and Effectiveness

We remain committed to upholding human rights and safety in our supply chain and we review our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement is made for the financial year ending 31 December 2021.

During the period covered by this statement, we have found no evidence, nor received any allegations, of modern slavery either within AMP or within our supply chain.

Digitally signed by:

Oliver Graham

On behalf of Ardagh Metal Packaging S.A.

22 June 2022