

MODERN SLAVERY STATEMENT

ISSUE DATE: MAY 29, 2024

Trivium Packaging (Trivium) offers customers around the world innovative and sustainable packaging solutions supported by scalable production and outstanding customer service. We operate 61 locations across 19 countries worldwide, employ approximately 7,300 employees and have a group revenue of \$3.098 billion as of December 31, 2023.

Trivium recognises that it has a responsibility to take a robust approach to modern slavery and we are committed to improving our practices to combat modern slavery (including child labour, slavery, forced labour and human trafficking), both in our own organisation and our supply chains.

This statement is made by Trivium Packaging B.V. and its subsidiaries pursuant to the California Transparency in Supply Chains Act 2010, on behalf of Trivium Packaging Canada Limited under the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2024 ("Canadian Act") and also serves as the statement for Trivium Packaging UK Holdings Limited for the financial year ending 31 December 2023, as required pursuant to section 54(1) of the Modern Slavery Act 2015.

We hereby report on the steps we have taken during 2023 to combat modern slavery and child labor.

Our business and supply chains

Trivium's business is organised into business units across three main geographic areas. Our North and South American operations include 9 production facilities. Our European, African and Asian operations include 40 production facilities.

As is to be expected from a large metal packaging manufacturer, Trivium receives a significant amount of materials and services. Key supply chains are critical to the business, and as such, are managed as commodities, under the responsibility of global and regional managers. Key supply to our process includes: energy, raw materials, packaging and logistics. These commodities have a chosen consolidated number of suppliers who can serve the regions with multi-year service contracts or pricing agreements, which include certain service level agreements and key performance indicators to ensure quality of supply.

Our approach and policies

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Trivium supports this commitment in its Code of Conduct which was published in 2020 and a Code of Conduct eLearning was rolled out to employees in 2021, 2022 and 2023.

We encourage staff to report any concerns relating to non-compliance with laws (including any modern slavery issues) either directly to management or through a hotline, which is available by phone or online to all staff so that they can report easily and on an anonymous basis, without fear of retaliation or discrimination. In the Code of Conduct eLearnings, employees have to certify that they are not (directly or indirectly) involved in any violations of our Code of Conduct, which

includes forced and child labour.

Trivium is committed to protecting human rights and fighting against modern slavery. Trivium also respects fundamental employment rights, including rights of freedom of association and collective bargaining. In 2023 Trivium adopted its Labour and Human Rights Policy which sets out these fundamental employment rights and its principles in relation to human rights. This important Policy applies to everyone who works for Trivium, from employees to (sub)contractors, but also to third parties conducting business on our behalf or in our name (e.g., agents, consultants), wherever in the world.

In addition, we have other policies, procedures and documentation that seek to minimise the risk associated with modern slavery. In 2023 we updated Trivium's Supplier Code of Conduct. This Supplier Code of Conduct which is available on our website and incorporated in our purchasing agreements, includes a set of mandatory requirements for working with Trivium, and clarifies our global expectations for our supply chain partners in areas including human rights, bribery and fraud, modern slavery, conflict minerals, health and safety, discrimination and diversity, equity, inclusion & belonging (DEIB) and business integrity.

In 2023, we introduced internal Sustainable Procurement Guidelines, which outline the Environmental, Social and Governance (ESG) standards that our suppliers are expected to meet. These guidelines include a range of practices, such as integrating ESG assessments into vendor selection, promoting ESG practices across our supply chain, defining expectations through our Supplier Code of Conduct, and conducting regular supplier ESG assessments and audits. These Guidelines serve as a complement to Trivium's Global Procurement Policy, and a useful handbook for our procurement team to further promote Trivium's commitment in fostering a sustainable supply chain.

Trivium requires its Top-200 suppliers to confirm that they have read, understood and adhere to the minimum ESG standards as summarized in the Supplier Code of Conduct. At the time of publication of this Statement, 78% of the top 200 suppliers had either signed off on our 2022 Supplier Code of Conduct or presented us with their own Code of Conduct, which we judged to be of a similar level of stringency as ours. Additionally, 87 of the Top-200 and new suppliers have signed off on our updated 2023 Supplier Code of Conduct or provided their own Code of Conduct that meets our standards.

Our risk assessment, due diligence processes and supply chain verification

We have 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. Below we set out the detail of how we seek to verify our supply chains, audit suppliers and obtain supplier certifications.

Desktop risk assessment

An in-depth risk assessment is conducted on a selection of suppliers. We take multiple factors into consideration when deciding which suppliers to focus on, including their industry, geography and the risk of human rights abuses (including modern slavery). We also continually monitor media sources to ensure that we remain alert to potential risks within our supply chains.

We pay particular attention to our Top-200 suppliers, who represent around 84% of our purchase spend. We invite them to respond to an annual questionnaire, addressing a broad

range of ESG topics, including environmental management, greenhouse gas emissions and workplace controls. We use the results to create a sustainability scorecard for each supplier, allowing us to monitor their ESG performance over time and keep track of the initiatives they have in place. In 2023, our ESG questionnaire targeted specifically on raw material suppliers to obtain accurate emission factors, recycled content data, and insights into their calculation methods and underlying assumptions. We achieved an 89% completion rate among the requested suppliers. We actively encourage our suppliers to join the EcoVadis platform.

Onsite assessments & third-party audits

Based on the outcome of the desktop risk assessment, a supplier may be required to undergo either customized follow-ups such as an on-site assessment conducted by one of our representatives or an ESG audit by a 3rd party. Both the assessment and audit include content related to modern slavery. The focus of these follow-ups and audits is determined by the supplier's ESG performance and their involvement in the EcoVadis assessments.

We consider third-party audits to be preferential for suppliers within higher risk geographies, as local auditors are often best equipped to understand the local regulatory landscape and challenges. In 2023, a total of nine on-site supplier audits or desktop reviews were conducted, involving four tinplate suppliers, two aluminium suppliers, and three liquids suppliers.

Contracts and certification

To ensure that our suppliers respect and enforce our standards, including as regards ethical trading, our key supply contracts require suppliers to comply with all applicable laws and regulations. Moreover, these requirements are set out in Trivium's general terms and conditions of purchase.

We also have additional certification requirements for suppliers of certain products. For example, to ensure that no conflict-based tin enters our production processes, in accordance with our legal obligations, we require suppliers of tin products to provide relevant declarations.

If there is evidence that there may be conflict-based tin in a supplier's process, we require them to provide us with appropriate due diligence regarding the mineral supply chain.

Remediation

We have not encountered instances of modern slavery in our operations or supply chain. To the extent that such issues are uncovered in the future, we will consider appropriate remediation.

Training about Modern Slavery

We focus on socially responsible and environmentally sustainable sourcing, including in relation to modern slavery issues. This has led to increased awareness across the business at all levels, including through presentation of such issues to senior management.

Topics related to modern slavery are presented to our key procurement managers and we are training employees responsible for procurement decisions on compliance topics, which includes modern slavery.

In addition, several trainings for suppliers were provided in 2023 and YTD 2024 and modern

slavery was part of these trainings. In 2024, the Top-200 suppliers will be trained more in detail on the topic of modern slavery.

Responsibility and Effectiveness

Trivium remains committed to upholding human rights and safety in our supply chain and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

During the period covered by this Statement, we have found no evidence, nor received any allegations, of modern slavery either within Trivium or within our suppliers.

This report is approved by the Board of Directors of Trivium Packaging B.V. pursuant to section 11(4)(b)(ii) of the Canadian Act.

Digitally signed on behalf of Trivium Packaging B.V., by its duly authorized officers and directors on 29 May 2024: Michael Mapes, Chief Executive Officer and Stefan Siebert, Chief Financial Officer.

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Michael Mapes

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Stefan Siebert

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Incorporated and approved on behalf of Trivium's UK subsidiary, Trivium Packaging UK Holdings Limited, also on behalf of its subsidiaries.