

CONFLICT MINERALS REPORT 2024

ISSUE DATE: November 2024



Background

Conflict minerals, also known as 3TG, are defined as minerals or metals containing or consisting of tin, tantalum, tungsten or gold (collectively, "Conflict Minerals"). In politically unstable areas, the minerals trade can be used to finance armed groups, fuel forced labor and other human rights abuses, and support corruption and money laundering.

Introduction

As one of the global leaders in infinitely recyclable metal packaging solutions, Trivium Packaging is committed to the responsible sourcing of the minerals which are needed for the manufacturing of our products.

Our steel packaging products are made from tinplate which is included in the definition of Conflict Minerals. Tin is one of the minerals which could be linked to armed conflicts and related human rights abuses. We work continuously with the aim to ensure that tin is sourced responsibly and does not contribute to conflicts or other related illegal activities.

Our ambition

In 2023, we confirmed that 100% of Trivium's tinplate manufacturers, traders and component suppliers are covered by a Conflict Minerals Reporting Template (CMRT) or conflict-free mineral statement. Despite this achievement, we remain committed to our ongoing due diligence process, diligently monitoring and verifying our suppliers' sourcing practices. Additionally, we work closely with our suppliers to find alternative solutions, such as tin-free steel, to reduce our dependency on Conflict Minerals and promote sustainable sourcing practices.

This Report describes our supply chain due diligence process for Conflict Minerals and asserts our commitment to comply with the EU Conflict Minerals Regulation 2017/821 (the "Regulation"), but also the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The reporting period for this report covers the calendar year 2023. This report is based on information provided by our suppliers through our reasonable country of origin inquiry and risk-based due diligence measures. We depend on our suppliers for the accuracy of the information they provided about the smelters or refiners they use.

Due Diligence

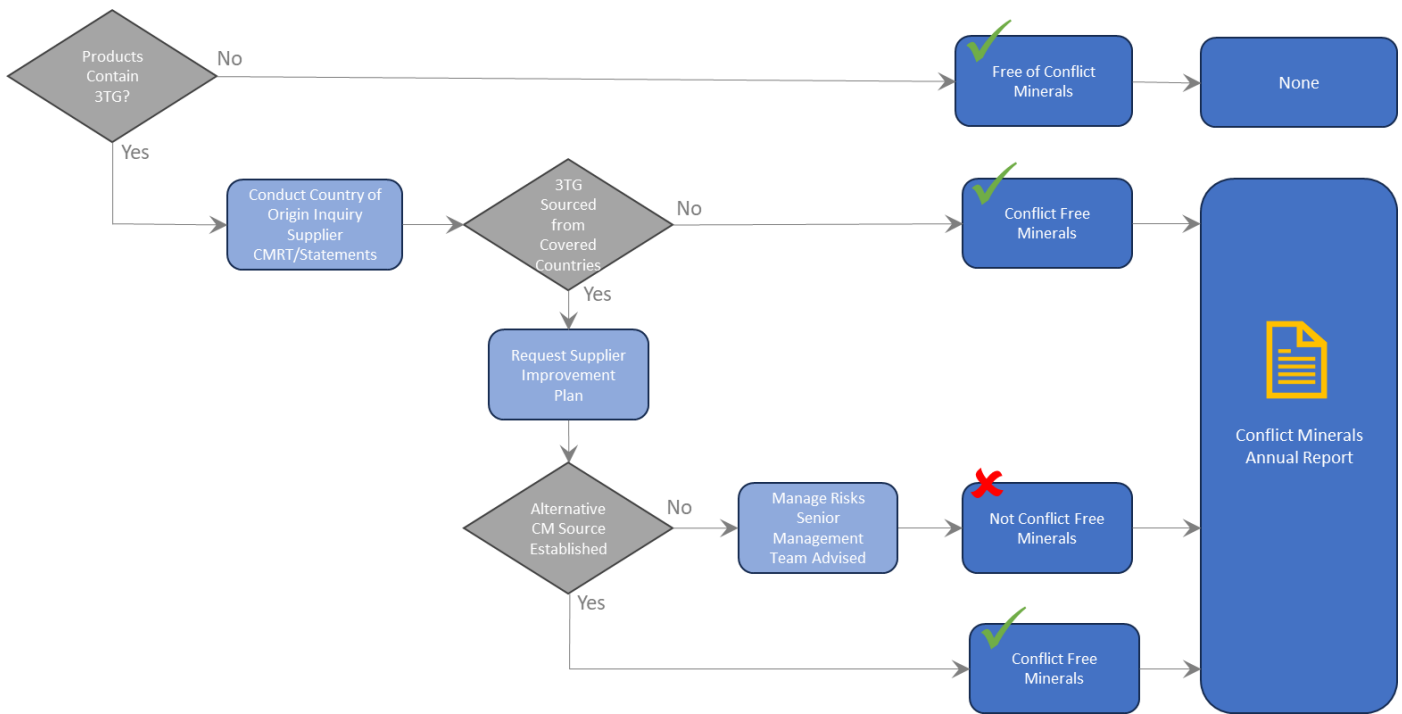
Our due diligence program for Conflict Minerals is designed according to the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the "OECD Guidance"). Trivium follows these 5 steps:

- Step 1: Establish strong company management systems

- Step 2: Identify and assess risks in the supply chain
- Step 3: Design and implement a strategy to respond to identified risks
- Step 4: Conduct independent third-party audit of supply chain due diligence at identified points in the supply chain
- Step 5: Report annually on supply chain due diligence

Below is a detailed overview of our Conflict Minerals due diligence process flow:

Due Diligence Process Flow



Step 1: Establish strong company management systems

Policies on conflict minerals

Trivium Packaging is committed to conflict-free tin sourcing, as outlined in our [Code of Conduct](#) and [Supplier Code of Conduct](#). Our suppliers of products containing tin need to demonstrate traceability and accountability of the raw materials they delivered to us, including disclosing the smelter base in accordance with the CMRT. Our Suppliers are required to sign our Supplier Code of Conduct or provide their own Code of Conduct that meets our standards.

Governance & resources

Managing Conflict Minerals at Trivium involves a collaborative effort from the Procurement, Legal & Compliance, and Sustainability teams. These teams are responsible for ongoing monitoring, annual due diligence, and compiling Conflict Minerals reports. This process is further supported by Trivium’s leadership team, including the Chief Sustainability Officer and

Chief Transformation Officer, to ensure timely communication and follow-up on non-compliances, as well as the development and sharing of corrective action plans with suppliers.

In September 2023, Trivium also became a member of the [Responsible Minerals Initiative](#) (RMI). By joining, Trivium aims to further enhance our responsible minerals sourcing program, conduct a due diligence review of our supply chain and develop best practices aligned with international standards.

Step 2: Identify and assess risks in the supply chain

All tinplate manufacturers are required to share a CMRT on an annual basis. All tinplate traders and component suppliers are also requested to share their CMRT annually, in exceptional cases, we will accept conflict-free mineral statements. The Procurement team is responsible for engaging with suppliers who need guidance on completing the CMRT and addressing questions regarding conflict minerals. Direct communication (including email) is used to engage with suppliers for conflict minerals reporting. Follow-up communications are initiated if there is no response or cooperation from suppliers. Specific steps taken:

1. Information collected from multiple open data sources (e.g. RMI, European Commission)
2. A Reasonable Country of Origin Inquiry (“RCOI”) is conducted with all relevant suppliers to determine whether any Conflict Minerals in their products originate from the Democratic Republic of the Congo or an adjoining country (“Covered Countries”).
3. For upstream actors (e.g. smelters), the conformant list is updated to ensure smelters and refiners successfully completed an assessment against the Responsible Minerals Assurance Process (“RMAP”) standard or an equivalent cross recognized assessment.
4. The RMI’s CMRT is used to obtain sourcing information from our direct suppliers i.e. upstream companies of tinplate and tinplate components.
5. All tinplate suppliers (including tinplate producers, traders and component suppliers) are asked annually to provide a copy of their CMRT and/or conflict-free mineral statement.
6. Information provided in the CMRT is checked for completeness and compliance. The Procurement department tracks progress and outcome of the analysis on an ongoing basis.

2024 Supplier Survey Results (for Calendar Year 2023)

We confirm that 100% of Trivium’s tinplate manufacturers, traders and component suppliers are covered by a Conflict Minerals Reporting Template or conflict-free mineral statement.

Through our continuous conversations with suppliers, we have been informed that a portion of the tin sourced by one of our suppliers may have originated from a Covered Country via a trader utilizing the International Tin Supply Chain Initiative (ITSCI). While ITSCI is a recognized program aimed at improving traceability and mitigating risks in conflict-affected areas, this supplier has decided to discontinue sourcing tin from this origin.

Step 3: Design and implement a strategy to respond to identified risks

If suppliers fail or refuse to respond to our questions regarding Conflict Mineral issues after several attempts, a formal notice outlining the relevant regulations and consequences of non-compliance will be sent to them. Identified risks will also be communicated to the leadership team, including the Chief Sustainability Officer and Chief Transformation Officer. Appropriate follow-up actions and corrective action plans will be implemented. If any of our suppliers is found to be supplying us with 3TG from Covered Countries that support conflicts, we may request the supplier to establish an alternative source of 3TG.

Step 4: Conduct independent third-party audits of supply chain due diligence at identified points in the supply chain

Trivium relies on the list of conformant smelters and refiners published by the RMI to conduct our due diligence exercise on Conflict Minerals in our supply chain.

Step 5: Report on supply chain due diligence

Trivium annually discloses its Conflict Minerals report on its public corporate website and in its annual Sustainability Report. Internal records of due diligence findings are maintained for traceability purposes.

Reporting concerns

Individuals with concerns or that wish to report on Conflict Minerals, including but not limited to suspected extraction, trade and handling of minerals from high-risk area in our supply chain, can contact our Legal & Compliance department via email at legalandcompliance@triviumpackaging.com. The identity of the individual submitting a report (if provided) will be kept confidential as long as it does not hinder or frustrate any follow-up investigation. Trivium will not tolerate the harassment or victimization of anyone who raises a genuine concern in good faith. Any allegation of retaliation will be investigated promptly and may result in disciplinary action.

Annex

- [Conflict Minerals Reporting Template \(responsiblemineralsinitiative.org\)](https://responsiblemineralsinitiative.org)

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