

Environmental Policy

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1. Policy statement

Trivium Packaging's mission is to reliably deliver high quality, innovative and sustainable packaging that exceeds expectations in protecting and promoting our partners' brands. Sustainability is grounded in three foundational pillars: Customer, Planet and People.

Trivium is committed to operate in an environmentally and socially sustainable way and creating long-term value through implementation of a sustainability strategy that focuses on the environmental and social dimensions of doing business. For us, being responsible means understanding the impact Trivium can have on the environment and the communities we share it with – before, during and at the end of our operations. We aim to make a positive contribution to the local environments in which we operate and seek to reduce any potential negative environmental impacts. We aim to continually improve our performance, and to prepare to respond to future challenges and opportunities.

Objective

Trivium acknowledges the important role that we play in understanding, protecting and enhancing the services that ecosystems provide and the underlying biodiversity. We are therefore constantly striving to optimize our use of natural resources to develop rigid metal packaging solutions. Therefore, our objective is:

- to be in compliance with environmental and operational permits and other (local) environmental regulatory requirements;
- to prevent incidents with potential environmental and biodiversity impacts;
- to adopt good environmental practices and continuous improvement through environmental management systems in our plants.

2. Scope

This Policy applies to all who work for Trivium from employees to (sub)contractors but also third parties working on our behalf or in our name, wherever in the world.

This Policy is part of Trivium's sustainability strategy and supports the achievement of the sustainability long term targets. It complements our supplier and company Code of Conduct 1,2 and should therefore be read in conjunction therewith.

In addition to this company wide Policy, local environmental policies might be implemented as part of the local management systems. Such policies must be

¹ [EN - Code of Conduct.pdf \(service-now.com\)](#)

² [Code of Conduct 2022.pdf \(service-now.com\)](#)

complementary and in line with this Policy. Trivium will communicate and make its Policy as well as its objectives internally and externally available.

3. Roles and responsibilities

Senior management

The Chief Sustainability Officer (CSO) is accountable for the environmental (incl. water management), biodiversity and other sustainability related initiatives and leads the Global Sustainability Team. Updates to this Policy are drafted and coordinated by the Global Sustainability Team on a regular basis and submitted for approval to the Management Board.

Executive Committee

The Executive Committee is responsible for the roll out of this Policy and will support and promote the environmental initiatives described in this Policy, including:

- Establishment of the Environmental Policy and the group sustainability objectives and compatibility with the strategic direction of the organization.
- Integration of the environmental requirements into the organization's processes.
- Availability of resources needed for environmental processes.
- Communication on the importance of effective environmental management.
- Promotion of continuous improvement in environmental management.

Business owners and line managers

Business owners shall support the Environmental Policy and initiatives. They will integrate the environmental requirements into the day-to-day operations as it applies to their areas of responsibility. Business owners will, periodically, be required to confirm that the requirements within this Policy have been met and be able to demonstrate how compliance has been achieved subject to any exceptions identified. For example, through the Environmental Control Standard (ECS) questionnaire which is sent to the production locations on a regular basis.

Business owners must account for any applicable local legal and regulatory requirements. This Policy does not supersede local regulatory requirements or industry specific standards. Please contact the Global Sustainability Team if any provision of this Policy is inconsistent with requirements imposed by local legislation. Business owners and Line management are responsible for the implementation of this Policy.

The Policy is published to all employees and third parties conducting business on our behalf or in our name (e.g., agents, consultants), wherever in the world, through Trivium intranet.

Employees

Everybody described in the Scope of this Policy has the responsibility to:

- Read and understand this Policy.
- Not engage in behavior or activities which are conflicting with this Policy.
- Attend training when requested to do so.
- Report potential infringements of this Policy to your line manager or anonymously via the hotline see chapter: Report Mechanism.

4. Environmental Management and Practices

Environmental Management

Trivium aims to comply with all relevant international, national and local regulations relating to environmental matters as well as with internal environmental demands (e.g., arising from our environmental control standards).

All plants shall implement and maintain an Environmental Management System in accordance with ISO 14001, for example by following the internal ECS..

Environmental incidents must be reported into Trivium Risk Inventory Management System (“TRIMS”) in accordance with the TRIMS reporting procedure (described in the TRIMS SOP available in the TRIMS system). All such reports will be investigated depending on their severity as set out in the procedure, including a root cause assessment and definition of corrective actions.

The rigid metal packaging products that we place on the market protect, promote and preserve the content of the cans. For example, the high barrier of the packaging cans are excellent preservers of nutrients. We communicate the environmental benefits and impacts of our materials in white papers and our sustainability report which are available on our website. We expect people in scope of this Policy to make themselves familiar with the information provided.

Environmental Practices

Trivium will continuously reduce the environmental footprint of its operations:

Product eco-design:

- Eco-design means that sustainability is embedded into our product development, from ideation through to standardization. We have set eco-design criteria, to generate a standardised measure for the sustainability of new and existing products. Built on a multi-criteria approach – and using the European Commission’s Product Environmental Footprint guidelines as a benchmark.

If you would like more information on the Eco-Design process, please contact the sustainability or research and development team.

- Trivium continues to work collaboratively with customers, suppliers, and logistics providers that aim to significantly reduce carbon emissions across the value chain, with a view to passing on these reductions to our customers in the form of lower carbon packaging. More information on these processes is available through the Global Procurement Policy, our company Code of Conduct and for example through our company mission statement: “To reliably deliver, high-quality, innovative, and sustainable packaging that exceeds expectations in protecting and promoting our partners' brands”.

Energy and emission:

- Trivium strives to use all energy sources as efficiently as possible, and to reduce greenhouse gas emissions and emissions related to VOC/noise/odor/nuisance.
- Trivium regularly assesses the possibilities for introducing renewable energy in our operations in order to reduce our carbon footprint.

Water and wastewater:

- Trivium strives to achieve sustainable use of water in the communities in which we operate.
- Trivium regularly assesses our exposure to water scarcity in all forms, for example through the water risk assessment filter of the World Wildlife Fund (WWF) and initiates appropriate actions to ensure the long-term availability of water.
- We identify local community needs and engage stakeholders to expand awareness and the adoption of water, sanitation and hygiene (WASH) programs.
- Trivium ensures that wastewater from our activities is treated in compliance with legal requirements. This is done either at an onsite wastewater treatment plant or an off-site municipal/industrial wastewater treatment plant.

Waste and by-products:

- Trivium works to eliminate or reduce/minimize waste generation in order to conserve resources and avoid pollution of soil, water and air.
- Resource recycling shall be implemented where feasible.
- Any form of uncontrolled landfilling or uncontrolled on-site/off-site waste handling must be avoided.

End of Life:

- Trivium is committed to reducing the environmental impacts of our products and to reduce the impacts of our products end-of-life. For example, the metal in Trivium products, is infinitely recyclable. We continuously communicate this message to our stakeholders, through the Metal Recycles Forever logo provided by the Metal Packaging Europe association.

Biodiversity:

- Trivium is committed to conserving the environment through efforts including utilizing the WWF Biodiversity Risk Filter to assess manufacturing locations and identify potential biodiversity risks.

Targets

Our environmental targets, objectives as well as progress updates are published in our sustainability report on a regular basis. The sustainability report is available on our external website for reference. Our CO2 reduction targets are externally validated by the Science Based Targets initiative (SBTi) and can be found on their website: [Companies taking action - Science Based Targets](#)

Our targets include but are not limited to the following list (full list is available in our sustainability report:

- SBTi validated: Reduce 42% of Scope 1 and 2 CO2 footprint by 2030 (vs 2020 baseline)
- SBTi validated: Reduce 25% of Scope 3 CO2 footprint by 2030 (vs 2020 baseline)
- 80% of our new product developments meet our eco-design standard by 2030
- Use 100% renewable electricity in our plants by 2030
- Reduce 10% of water consumption by 2030 (vs 2020 baseline)
- Achieve zero landfill waste by 2030

We expect everyone in Scope of this Policy to read Trivium's environmental targets. Contact your manager or the Global Sustainability Team to discuss how you can contribute to these targets.

5. Report mechanism

We encourage anybody in Scope of this Policy to report any concerns relating to non-compliance with the environmental Policy through our hotline: (866) 297-0224 (see code of conduct Appendix C on SharePoint) or online: legalandcompliance@triviumpackaging.com or www.triviumpackaging.ethicspoint.com which is available to all staff so that they can report easily and on an anonymous basis, without fear of retaliation or discrimination.

6. Investments and stakeholders

Trivium prioritizes environmental aspects of investments and purchases when planning, costing and implementing activities with material environmental impact.

Trivium is committed to open and unbiased dialogue with our stakeholders on environmental issues, and we periodically align our approach with external and internal stakeholders through materiality assessments.

7. Review and update

This Policy will be reviewed from time to time by the Global Sustainability Team and the Environmental Social Governance (ESG) Compliance Committee to propose updates as deemed necessary and to reflect the latest developments in our businesses and in best practice.

