Modern Slavery Statement

Introduction

Trivium Packaging (Trivium) offers customers around the world innovative and sustainable packaging solutions supported by scalable production and outstanding customer service. We operate more than 60 locations across 21 countries worldwide and have approximately 8,000 employees and a group revenue of over $2.7 billion.

Trivium was created in 2019 through the merger of industry leaders Exal Corporation and Ardagh Group's Food & Specialty business. Respect for human rights is an integral part of the corporate social responsibility commitments of these legacy organizations, which will continue in Trivium.

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 and also serves as the statement for Trivium Packaging UK Limited for the financial year ending 31 December 2019, as required pursuant to section 54(1) of the Modern Slavery Act 2015.

We hereby report on the steps we have taken during 2019 to combat modern slavery.

Our Business and Supply Chains

Trivium's business is organised into business units across three main geographic areas. Our North & South American operations include 9 production facilities. Our European operations include 46 production facilities. Our Rest of the World operations include 3 production facilities.

As is to be expected from a large metal packaging manufacturer, Trivium receives a significant amount of materials & 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. Trivium mainly sources its goods within the EU and US.

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 will support this commitment in its upcoming Code of Conduct to be published during the course of 2020. In the meantime, Trivium maintains the standards and principles set out in the Codes of Conduct of both Ardagh Group and Exal Corporation.

As such, 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.

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 addition, we have other policies, procedures and documentation that seek to minimise the risk associated with modern slavery. For example, our hauliers and logistics providers are required to follow set procedures to ensure that goods are secured and sealed, reducing the risks of human trafficking and migrant smuggling.

Trivium is working on the implementation of key social, ethical and environmental standards for our supply chain, in the continuity of our legacy programs.

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.

When completing the risk assessment, we combined for 2019: (i) information from multiple sources including Verisk Maplecroft risk indices, and (ii) information provided by suppliers via a mandatory online questionnaire. Suppliers are reassessed on a rotational basis.

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 (SMETA 4 Pillar) by a 3rd party. Both the audit and assessment include content related to modern slavery.

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 2019, we did not conduct unannounced audits.

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.

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.

Training about Modern Slavery

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

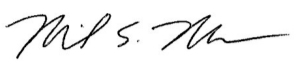
Topics related to modern slavery are presented to our key procurement managers and we will be developing online training for employees responsible for procurement decisions.

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.

Digitally signed by:



Michael Mapes,

Chief Executive Officer,

Trivium Packaging