

# Conflict Minerals Report

On 31<sup>st</sup> October 2019 Trivium Packaging was formed out of the combination of the Ardagh Group's Food & Specialty metal packaging business and the business of Exal Corporation.

As this Report covers the reporting year ended 31 December 2019, it should be read in conjunction with the Conflict Minerals Report of Ardagh Group S.A., as filed in accordance with Rule 13p-1 under the US Securities and Exchange Act of 1934 (the "Rule"), and which includes information on the use of Conflict Minerals by our Food & Speciality metal packaging business between 1<sup>st</sup> January and 31<sup>st</sup> October 2019. Conflict minerals are defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten (collectively, "Conflict Minerals").

As a non-listed company, Trivium Packaging is not subject to the Rule but we have prepared this Report to assert our commitment to responsible sourcing of minerals and to set out how we are preparing for the entry into force of the EU Conflict Minerals Regulation on 1<sup>st</sup> January 2021.

## 1. Company Overview and Scope

Trivium Packaging is a global leader in 100% infinitely recyclable metal packaging solutions, for most of the world's leading food, and consumer brands.

Our steel packaging products are made from tinplate (electrolytic tinplated steel & electrolytic chromium coated steel) which is included in the definition of Conflict Minerals.

Except as described above, we do not use Conflict Minerals in our manufacturing processes.

## 2. Our approach to due diligence

Tin is one of the minerals which could be linked to armed-conflicts and related human rights abuses, which explains why it is covered by the U.S. Conflict Minerals Law (Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act) and by the upcoming EU Conflict Minerals Regulation.

Our due diligence program relating to Conflict Minerals is designed accordingly.

As a newly formed company, we have been building on our legacy processes. As such, our due diligence into the supply chain of our Food & Speciality metal packaging business has been conducted in accordance with the Rule throughout 2019. We are currently working on adjusting this due diligence process for 2020 to better fit the needs of Trivium Packaging.

For 2019, a reasonable country of origin inquiry ("RCOI") was conducted in good faith. It is designed to determine whether any of the necessary Conflict Minerals in our products originated in the Democratic Republic of the Congo or an adjoining country ("Covered Countries").

The Responsible Minerals Initiative's ("RMI") conflict minerals reporting template ("CMRT") was used to obtain sourcing information from our direct suppliers of tinplate and tinplate components. Our RCOI included assessing the responses we received from our suppliers and evaluating smelters.

Based on the responses from our tinplate suppliers, the tinplate sourced from them did not contain conflict minerals originated from a Covered Country

However, from the responses from our suppliers of tinplate components we have reason to believe that some of the necessary tinplate used in those products, which are incorporated in our final product, may have contained conflict minerals originated from a Covered Country.

### **3. Risk Mitigation in the Next Reporting Period**

In order to continue improving our approach and mitigating risk arising from Conflict Minerals in the supply chain, we intend to take the following steps:

- Collaborate with tinplate component suppliers to achieve full coverage;
- Collaborate with suppliers to raise the awareness on the importance of the topic at hand, and
- Inform new suppliers, if any, early on to ensure awareness.

July 2020

Digitally signed by:  
Michael Mapes,  
Chief Executive Officer,  
Trivium Packaging