

Responsible Procurement Policy

Department Name: Procurement / Sustainability

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Statement

Dear suppliers and other stakeholders,

Trivium Packaging's mission is to reliably deliver, high quality, innovative and sustainable packaging that exceeds expectations in protecting and promoting our partners' brands. By exclusively using infinitely recyclable materials and driving out inefficiencies in our processes, Trivium delivers sustainable value to our customers and the planet. Sustainability guides us in all our actions and forms the basis for our Responsible Procurement Policy, which defines how we choose to do business and interact with our suppliers regarding key social, ethical and environmental topics.

At Trivium Packaging our culture stems from the following core values: Passion, Teamwork and Excellence. These core values allow us to meet our commitments to our customers, partners, suppliers and stakeholders, and to promote ethical corporate behavior within Trivium Packaging and with respect to third parties.

'Trivium' is Latin for three roads coming together. At Trivium Packaging, our success is grounded in three foundational pillars: Planet, People & Customer. To us, being sustainable means simultaneously creating value along these three dimensions. Our Responsible Procurement Policy includes a set of mandatory requirements which all our suppliers, contractors and their subsidiaries need to meet to be able to do business with Trivium Packaging. We strongly believe that the journey to continuously strengthen our foundational pillars will benefit both Trivium Packaging and our suppliers.

In an ever-changing world, it's not easy to assess situations and evaluate their associated risks. It takes courage and effort to act with integrity beyond mere compliance with law and regulation. This Responsible Procurement Policy is designed to clarify our global expectations for our supply chain in the areas of human rights and labor, environment, health and safety and business integrity. It is intended to complement Trivium Packaging's Code of Conduct and the company's other policies and standards referenced therein.

The policy will be reviewed periodically to ensure that it continues to meet our targets and moves us closer towards our vision to be the global leader in metal packaging.

Thank you for your dedication.

Regards,

Andrew Vanstone,
Senior VP Procurement & Operation

Jenny Wassenaar,
VP Sustainability

Overview

Implementation

Our suppliers must ensure sustainable and ethical business practices through policies, targets, management systems and processes that reflect the impacts and opportunities of the organization. In addition, they must strive for continuous improvement of their sustainability performance. Our suppliers must comply with applicable laws, rules and regulations as well as the standards described in this policy. This policy applies to all Direct and Indirect (production-related and non-production related) suppliers, contractors and their subsidiaries. This policy is a mandatory part of Trivium Packaging's General Terms and Conditions of Purchase.

Compliance

Through dialogue with our suppliers, we aim to continuously improve business conduct and to discover our suppliers' unique competences that contribute to Planet, People & Customer. When we conduct our annual supplier questionnaire, we will require our suppliers to certify compliance to this policy. We expect suppliers to use a proactive approach in establishing and maintaining the standards set forth in this policy, including the collection and evaluation of adequate and timely information, the establishment of relevant, measurable objectives and targets, and the regular monitoring and verification of progress. We expect our suppliers to develop control mechanisms which are in line with the size and complexity of their business. As a minimum standard we expect our suppliers to:

- Conduct business in a responsible manner covering the requirements set out in this policy;
- Adhere to relevant laws and regulations; and
- Strive for continuous improvement.

Non-Adherence

We reserve the right to terminate any agreement with any supplier that cannot demonstrate compliance with this policy.

Whistleblowing procedure

We encourage our suppliers to provide their stakeholders with access to a mechanism to raise concerns relating to (suspicion of) a breach of applicable laws, rules and regulations as well as the standards described in this policy. We encourage our suppliers who identify a (suspicion of a) violation of the applicable laws, rules and

regulations as well as the standards described in this policy to contact Trivium Packaging (legalandcompliance@triviumpackaging.com).

In the following paragraphs we present the Trivium Packaging Responsible Procurement Policy along our three foundational pillars: Planet, People & Customer.

Planet:

Environmental Management:

Our suppliers must adhere to all relevant environmental laws and regulations. We expect our suppliers to measure and monitoring relevant environmental information. Continuous environmental improvements have to be demonstrated by means of clear targets and improvement policies. For example, reductions in raw materials, energy, emissions, discharges, noise, waste and reliance on natural resources and hazardous substances. A ISO14001 certification, or a comparable certification, are deemed sufficient.

Recycling & Waste Management

The collection and disposal off all waste must be managed through authorized service providers. Suppliers have in place or shall establish a procedure for the safe handling, storage, transportation, utilization and disposal of waste in accordance with applicable legislation.

Energy Use

We encourage our suppliers to move away from non-renewable energy sources where feasible and economically viable. In the interim, we expect our suppliers to identify and implement energy saving initiatives where applicable.

Environmental information

Suppliers provide customers and the general public with clear information about the environmental and safety aspects of their products and production processes.

Continuous improvement

Suppliers continually evaluate and improve their products, working methods, production and services. Suppliers ensure that these changes are executed in a controlled way and are acceptable to their customers and stakeholders.

Product stewardship

In accordance with the principles of product stewardship, suppliers identify the risks and environmental impact attached to their products during the production, distribution and transportation process as well as their entire lifecycle and look for opportunities to reduce these. In this context, suppliers share relevant knowledge, expertise and experience with their own suppliers, customers, and other parties.

Social responsibility in the value chain

We require our suppliers to manage their supply chain responsibly; taking care to identify and mitigate potential social, ethical and environmental risks. We require that each of our suppliers conduct a suitable supply chain risk assessment and implement sufficient controls where applicable.

Conflict Minerals (tinplate and tinplate component suppliers as well as tinplate traders)

We require our suppliers to comply with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act on Conflict Minerals. Suppliers providing products containing tin are required to demonstrate traceability and accountability of the raw materials delivered, including the disclosure of the smelter base according the Conflict Minerals Reporting Template (Responsible Minerals Initiative).

People:

Human Rights

Suppliers are expected to respect the Universal Declaration of Human Rights and to commit to respect the rights of individuals within their organization and throughout their supply chain.

Discrimination and Diversity

We expect all places of work, including those of our suppliers to be free of harassment and violence and free of any form of discrimination on the basis of, but not limited to race, ethnic background, nationality, age, religion, gender, sexual orientation or disability and to promote diversity and inclusiveness.

Child and Forced Labor

Suppliers must adhere to applicable employment laws. Suppliers do not use forced labor or child labor either directly or indirectly. Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and shall comply with relevant International Labor Organization (ILO) standards and act in line with Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor).

Right to Collective Bargaining

We expect Suppliers to respect the right of their employees to freedom of association and collective bargaining.

Fair remuneration

Suppliers pursue a fair remuneration policy with due recognition for performance and do not force their employees to work excessive hours. In case employees are asked to work overtime, their extra work is compensated in line with local laws.

Local community

Suppliers promote healthy and safe living conditions to local residents, support local job creating, local sourcing, education provisioning, and infrastructure development.

Health and Safety

Suppliers implement strict policies with the aim of creating an incident- and injury-free work environment and of preventing the occurrence of occupational illness and health problems associated with its activities. At all levels, suppliers play an active role in identifying and rectifying unsafe situations, and work on continuous improvement of the health situations. OHSAS18001 / ISO45001/ MSHA or a comparable certification are deemed sufficient.

Life saving rules

When visiting our sites, suppliers agree to follow our 10 Life Saving Rules. We are determined to protect people and aim for zero accidents by supporting each other in following these rules:

1. Work with a valid work permit / license when required
2. Use fall protection & follow guidelines when working at height
3. Do not operate on unprotected machine (All available guards in place , interlocks working)
4. Do not work or walk under a suspended load
5. Check equipment is isolated before work begins (LOTO: log out tag out)
6. Wear PPE that are provided for the job (gloves, glasses, ear-plugs, chemical....)
7. Always comply with driving rules (Respect speed limit, Use seatbelt / door and do not use mobile phone)
8. Obtain a permit before entry into a confined space
9. Do not use alcohol or drugs at work or attend work while under the influence of alcohol or drugs
10. Always comply with hazardous chemical rules (including fire & explosion risk)

Customer:

Business Integrity

Our suppliers must abide by all applicable anti-corruption, anti-bribery, anti-fraud and competition/antitrust laws and regulations. We require our suppliers to have clear internal policies or guidance documents regarding compliance with these laws and regulations, and the ability to demonstrate that they have communicated them to relevant employees.

Trivium Packaging is an ethical business which expects all its employees to act with integrity. This is clearly communicated to employees within our Code of Conduct, which can be found at: [click here](#)

Law and regulations

Suppliers operate in full compliance with international, national and local laws and regulations that are applicable to their business operations and obtain all the necessary permits. Local industry standards prevail in cases where these are more stringent than local legal requirements.

No Bribery

Suppliers will not engage in any form of bribery or otherwise offer any incentive or kickback to any Trivium Packaging employee, Trivium Packaging employee's family or friends, or other representative of Trivium Packaging in order to obtain or retain business or secure any business advantage with Trivium Packaging. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local, regional or otherwise applicable laws and regulations dealing with the bribery of government officials and commercial entities.

Open competition

Suppliers value free and fair competition throughout the world, and therefore comply with competition / antitrust laws in all areas in which they operate and have implemented strict policies in this respect.

Trade restrictions

Suppliers respect the applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or governments and have implemented strict policies to ensure compliance therewith.

Hospitality & Gifts

Suppliers are prohibited from providing or offering any gift or favor that could compromise or raise doubts about the neutrality of the decisions made by Trivium Packaging or the supplier. Suppliers are aware of and adhere to our requirements.

Conflict of interest

Suppliers will avoid any interaction with a Trivium Packaging employee that may conflict, or appear to conflict, with that employee acting in the best interests of Trivium Packaging. Suppliers will disclose to Trivium Packaging all available information about conflicts of interest, including financial interests of a Trivium Packaging employee in any of suppliers' businesses.

Confidentiality and intellectual property

Suppliers protect all confidential information provided by Trivium Packaging and its respective business partners, by putting in place appropriate measures to prevent disclosure or unauthorized use.

We expect our suppliers to respect intellectual property rights, including those of Trivium Packaging.

Company resources

If suppliers use or have access to Trivium Packaging assets, including people, systems, networks and facilities, suppliers must use these resources appropriately, in accordance with our instructions and for their intended business purpose only.

Data protection

Suppliers must assist Trivium Packaging in complying with applicable data protection laws, including the European General Data Protection Regulation (GDPR). Suppliers must provide transparency regarding personal data processing activities that concern the products or services provided to Trivium Packaging and ensure adequate technical and organizational protection measures.

No fraud and transparent accounting

We do not tolerate any incident of fraud, which refers to any action or omission, whether attempted or successful, which misleads or deceives, or which intends to mislead or deceive, any person for the purpose of obtaining an undue advantage and/or which results in an unjustified financial loss for Trivium Packaging. Suppliers must have internal controls designed to detect, prevent and respond to fraud. Any potential fraud that may have an impact on Trivium Packaging must be reported to us immediately.

Suppliers will ensure complete, fair, timely and accurate accounting practices and will keep records which accurately reflect the nature of the underlying transactions.

Business Continuity

Suppliers will maintain policies and plans that mitigate exposure to terrorism, crime, threats, pandemics, natural disasters and related major accidents.

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