

Ardagh Group Modern Slavery and Human Trafficking Statement

Introduction

This statement is made by Ardagh Holdings S.A. (“Ardagh”) and all relevant subsidiaries (the “Ardagh Group”) pursuant to their obligations under section 54(1) of the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act and Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act.¹ This statement sets out the steps we have taken to combat modern slavery in both our organisation and supply chains during the year ending 31 December 2025.

In this statement, the term “modern slavery” is inclusive of all forms of modern slavery, including human trafficking, forced labour and child labour.

Our organisational structure

We are a leading supplier of sustainable, infinitely recyclable, metal and glass packaging for brand owners around the world.

As at 31 December 2025, our principal businesses - Ardagh Metal Packaging (AMP) and Ardagh Glass Packaging (AGP) - operated 58 production facilities manufacturing either metal beverage cans and/or ends or glass containers primarily for beverage and food markets, in 16 countries (in the USA, Brazil, Europe and Africa) and employed approximately 19,000 personnel. This was made up of 23 metal packaging production facilities in AMP and 35 glass packaging production facilities in AGP. In addition, AMP operated two digital can printing businesses, one in North America² and one in Europe, and AGP operated a glass engineering business with operations in Europe. Ardagh Group reported sales of approximately \$9.6 billion for the full year ending 31 December 2025.

Our business and supply chain

AMP’s key inputs include aluminium coils (prime and recycled) and coatings, along with energy and water. The manufacturing processes including cutting, coating and shaping aluminium into containers.

AGP’s key inputs include silica sand, limestone, soda ash, and post-consumer recycled glass (cullet), along with energy and water. The manufacturing processes include mixing of raw

¹ This statement covers the following entities which are required to make a statement under the following laws:

- the UK Modern Slavery Act: Ardagh Glass Limited, Ardagh Metal Packaging Trading U.K. Limited and Ardagh Metal Packaging U.K. Limited.
- the California Transparency in Supply Chains Act: Ardagh Glass Inc and Ardagh Metal Packaging USA Corp.
- the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act: Ardagh Glass Inc, Ardagh Metal Packaging USA Corp and Hart Print USA Inc.

Please note that Ardagh Group’s metal packaging business, including Ardagh Metal Packaging USA Corp, Hart Print USA Inc, Ardagh Metal Packaging Trading U.K. Limited and Ardagh Metal Packaging U.K. Limited, is also subject to its own modern slavery and human trafficking statement.

² Hart Print, our digital can printing business in North America, operated 3 can printing facilities, 2 in the USA and 1 in Canada.

materials, melting those materials in furnaces, forming of glass packaging, inspection and subsequent packaging for distribution.

Once packaged, finished goods in both AGP and AMP are generally transported, primarily by land and where necessary by sea, to customer-specified locations.

Our procurement strategy is to promote long term business relationships and, where possible, to conduct business directly with suppliers and manufacturers as part of our efforts to ensure the materials and services we source are ethical from origin. The majority of our procurement spend is with large multinational companies, who are aligned with our efforts to ensure modern slavery does not exist within our business or supply chain.

In addition to sourcing the key inputs above, whilst our production facilities are primarily operated by Ardagh Group employees, in some instances we use subcontractors for activities such as facilities management and warehouse operations.

Our commitment to human rights – governance and our key policies

We are committed to ensuring modern slavery does not exist within our business and supply chain. To support this commitment we have established appropriate governance, policies and a risk management and due diligence programme as further detailed below.

Human rights governance

In 2025 the sustainability committee of the board of directors of Ardagh Group S.A. and the sustainability committee of the board of directors of Ardagh Metal Packaging S.A. (both subsidiaries of Ardagh Holdings S.A) (together the “Sustainability Committees”) were responsible for providing strategic direction to and oversight of Ardagh’s human rights commitments.

Our Group Compliance Director, as Ardagh Group’s designated human rights officer, is responsible for the effective management of the modern slavery related risks, and in 2025 reported on this to the Sustainability Committees. In undertaking this role, the Group Compliance Director is also responsible for ensuring the adoption within our business of appropriate measures (including to assess and manage risks), policies and processes, and training. In doing so, the role oversees the setting of goals and defining of KPIs to measure progress, and tracks these together with stakeholders across our business. These stakeholders, including those in our human resources, procurement, logistics and environment & health and safety teams, supported by a dedicated legal team, are involved in the identification, assessment and management of modern slavery risks and in ensuring ongoing compliance.

Our key policies

Our Code of Conduct and Responsible Procurement Policy are our key policies supporting our commitment to ensuring modern slavery does not exist within our business or supply chain. The policies have been developed with the input of multiple stakeholders across our business, including human resources and procurement, as well as input from external advisors.

Code of Conduct

Our Code of Conduct details our commitment to acting in an ethical and honest manner. Our Code of Conduct also sets out our commitment to human rights, our fundamental employment principles and rights for employees (including rights of freedom of association and collective

bargaining). In particular, we respect and comply with the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, as well as the ILO's Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy. Our Code of Conduct also details our commitment to respecting human rights and promoting social responsibility in our value chain, with specific reference to our respect for the Universal Declaration of Human Rights.

Our Code of Conduct encourages all staff to report any concerns relating to non-compliance with laws, including in relation to human rights, either directly to management or through our Speak-Up Hotline on an anonymous basis, without fear of retaliation or discrimination. Our Speak-Up Hotline is accessible online or by telephone.

Our Code of Conduct has been approved and adopted by the Board of Directors of Ardagh Holdings S.A. (the "Board"). It is available to all employees in local languages on our intranet internal portal and publicly on our website ([link](#)). Amendments to our Code of Conduct must be approved by the Board.

Responsible Procurement Policy

Our Responsible Procurement Policy outlines the standards we require of our suppliers, including as regards human rights, ethical and environmental matters. This policy sets out how we monitor adherence to our requirements (based predominantly on the Ethical Trading Initiative (ETI) Base Code principles) and the consequences faced by a supplier should they not adhere to all requirements. Non-adherence can result in cancellation or non-renewal of contracts.

We review our Responsible Procurement Policy and its associated procedures on a regular basis and it is available on our website ([link](#)).

Our Responsible Procurement Policy also informs suppliers of our how to raise concerns, including if they become aware of or suspect a violation of human rights.

Both our Code of Conduct and Responsible Procurement Policy are reviewed and adapted as necessary to address our risks and changes. In 2025 there were no significant changes to these policies. Further details of our communication and enforcement of these policies are set out in the section "Our approach to accountability".

Our approach to supply chain verification and audit

Assessing and managing risk

We have implemented a risk-based management system, which helps us to identify and manage potential human rights (including modern slavery), ethical, and environmental risks across our business and supply chain.

Within our own business

We have assessed and identified the risks of modern slavery in our own operations, and found these risks to be low. Notwithstanding the low level of risk, we have adopted various measures to prevent and mitigate the risk of modern slavery, which we assess for effectiveness on an annual basis. Examples of such measures include ensuring our employees have clear written contracts and age verification checks on new employees. In addition, we support freedom of association, with strong engagement with employees and employee representatives (including in unions and works councils). We also seek input from third parties working on our premises through our Worker's Voice surveys, which gives individuals the opportunity to provide anonymous feedback

on their working conditions.

In addition to our risk assessments, our production facilities may be subject to independent social audits. These audits evaluate labour and human rights standards, ensuring compliance with global labour standards, highlight areas for improvement and enable the sharing of lessons learned and best practices across all our facilities.

Within our supply chain

Given the low risk within our own operations, we placed greater focus on our supply chain, and have implemented the procedures detailed below. Our supply chain verification (i.e. due diligence) and audit programme look to prioritise our resources to focus on suppliers where we can have the greatest impact. In 2025 we focused our diligence efforts on our direct suppliers. We plan to continue with this focus, as well as further developing our evaluation of risks down our supply chain.

Desktop risk assessment

Each year we conduct desktop risk assessments on a selection of suppliers using a third-party tool. When determining which suppliers to assess, we consider multiple factors including, among others, industry, geography and their respective risk of human rights abuses (such as modern slavery).

These desktop risk assessments consider information from multiple sources, including responses from supplier questionnaires, independent risk indices (provided by the third-party tool using data primarily from the MVO Risk Checker), and online media sources.

Our suppliers are reassessed on a regular basis. The frequency of reassessment (between 1 to 3 years) is determined by the outcome of the previous risk assessment. The outcomes of the internal risk assessments are shared with the relevant suppliers. Where necessary we work with suppliers to propose and agree mitigation measures to reduce risk.

On-site Audits

Depending on the outcome of our desktop risk assessment, a supplier may be required to undergo an on-site ethical audit, either conducted by our representatives or by a third party. These ethical audits cover social (including modern slavery), environmental and health and safety matters. Such audits typically include a site tour, records review and worker interviews.

We consider third-party audits to be preferential for suppliers within higher risk geographies. We do not currently conduct unannounced audits.

In 2025, our desktop risk assessment did not identify any suppliers where on-site audits were required. This outcome reflected the risk profiles identified through desktop assessments and supplier due diligence during the year.

Additional mitigation measures

In addition to our standard risk assessment and audit process, where we are aware of heightened potential of human rights breaches, we may introduce additional mitigation measures.

In jurisdictions where external risk indicators identify an elevated risk of human rights abuses, including modern slavery, we implement additional mitigation measures. In 2025, this included enhanced engagement with certain suppliers in Brazil and Africa, including regular communications with suppliers on ethical employment practices and worker safety.

A further example is the additional mitigation measures AGP applies when sourcing cobalt, such as enhanced due diligence using the Responsible Minerals Initiative's Extended Minerals

Reporting Template, in light of the risks associated with illegal mining, poor working conditions, and environmental harm.

Certification

Through the incorporation of our Code of Conduct and Responsible Procurement Policy in our supplier contracts, including through inclusion in our General Terms and Conditions of Purchase, we require our suppliers to respect and enforce our standards, to comply with all applicable laws and regulations and take appropriate steps to ensure there is no modern slavery in their business. Furthermore, selected suppliers undertaking our supplier self-assessments (as part of our desktop risk assessment) are required to confirm their compliance with our Code of Conduct and Responsible Procurement Policy.

Our approach to accountability

Code of Conduct

Our Code of Conduct, and all its accompanying policies, apply to all our staff worldwide, all our companies, controlled joint ventures and third parties working on our behalf.

All our employees are made aware of our Code of Conduct and their obligations, and, on employment, certify that they have read, understood, and agree to comply with the Code of Conduct. Regular internally developed training is provided to all employees on our Code of Conduct. In addition, we also require certain employees, including senior management, to participate in an annual certification process confirming their compliance with our Code of Conduct.

In the event of any violations of our Code of Conduct, we take appropriate disciplinary actions in accordance with applicable law, which may include termination of employment. A compliance committee, established by the Board, is responsible for the implementation, enforcement, and monitoring of the Code of Conduct. The compliance committee reports to the Audit Committee of the Board on a quarterly basis.

Responsible Procurement Policy

Our Responsible Procurement Policy applies to all our suppliers, and is incorporated into contracts through reference in relevant General Terms and Conditions of Purchase. Non-adherence to this policy may result in cancellation or non-renewal of contracts with suppliers. Serious misconduct, including the use of child labour and inhumane working conditions, is classified as a material breach of our contracts. Our Sustainable Supply Chain Manager, with support from the legal and procurement teams, is responsible for monitoring adherence to our Responsible Procurement Policy.

Speak Up

We encourage employees and third parties to report any concerns, including those related to human rights and modern slavery, either to local management, and Ardagh contact or through our Speak-Up Hotline. All cases, however reported are handled in accordance with our Speak Up and Whistleblowing Policy ([link](#)).

In addition to encouraging employees to raise concerns, we have also adopted an internal Procedure on Reporting Child Labour & Modern Slavery, which specifically details the signs of modern slavery and steps to take if it is discovered. Any claims are investigated by our human resources and legal teams.

Training

For those within our business who are in roles that are most likely to come across modern slavery, including those in our procurement, logistics and human resources teams, we have developed an online training course. This training focuses on relevant details of our policies and risk management activities, how to recognise signs of modern slavery and steps to take if concerns are identified. The training is delivered on a regular basis to relevant selected employees. Over 200 employees have completed this training, which represents a 99% completion rate for those required to undertake training. We continue to review and develop training to other individuals as appropriate.

Monitoring and Performance

We did not receive any reports, either directly to our managers or via our Speak Up Hotline, related to modern slavery in our own business or supply chain.

In 2025 Ardagh Group set the following targets:

- 1) to conduct social and environmental due diligence, which includes coverage of modern slavery risks, on 100% of our critical suppliers, being those we consider to be global strategic suppliers; and
- 2) To train 100% of procurement and logistics category managers on preventing human exploitation.

As regards progress against those targets, in 2025:

- 1) We conducted our due diligence process, including risk assessment and media monitoring for 100% of our global strategic suppliers. Completion of supplier questionnaires is ongoing and forms part of our continuous improvement efforts.
- 2) We trained 100% of procurement and logistics category managers on preventing human exploitation. Post-training feedback confirmed that participants considered the training provided practical and relevant insights.

We will evaluate our targets for 2026, ensuring consistent monitoring and progress toward our commitments.

Responsibility and Effectiveness

During the period covered by this statement we did not receive or identify any concerns related to modern slavery in our own operations or our supply chain.

We remain committed to upholding human rights and safety in our business and our supply chain, and we review our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

This statement is made for the year ended 31 December 2025.

Signed by:



Mark Porto

Executive Chairman and Director

On behalf of Ardagh Holdings S.A.

22 April 2026