

# Ardagh Group 2024 Sustainability Report

We make packaging for good





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## Navigating this report

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Throughout the report, when we reference these two businesses individually, Ardagh Metal Packaging (AMP) and Ardagh Glass Packaging (AGP), we will use these colours to identify them:



# A message from our executive leadership team

As a leading manufacturer of highly recyclable aluminium and glass packaging, we are clear about the positive contribution we can make to people and the planet. Driven by our Core Values of Inclusion, Trust, Teamwork and Excellence – we make packaging for good.

This was a year of strong growth for our can making business, while our glass division navigated a more challenging and dynamic trading environment. In this context, we maintained our planned course of action and continued to invest for a more sustainable future across the Ardagh Group.

Our strategy to deliver on that promise, built on the pillars of Emissions, Ecology and Social, remains a priority for the business. During 2024, we made significant progress in each area, across both Ardagh Metal Packaging (AMP) and the Ardagh Glass Packaging (AGP) businesses. Our [Sustainability Roadmap](#), launched during the year, sets a course for our continued progress against our targets on greenhouse gas (GHG) emissions, VOCs, waste and water.

In 2024, AMP delivered strong growth, achieving double-digit EBITDA gains reinforced by a 3% increase in global demand and continued operational progress. To build on this momentum, we launched the Ardagh Metal Production System (AMPS), a standardised approach to process improvements helping our teams work more efficiently, reduce waste, save precious aluminium and enhance product quality – strengthening both performance and environmental outcomes.

Our glass business faced a more complex environment. While demand for highly recyclable packaging remains strong, sales fluctuated across regions. In response, we took deliberate steps to align our operations with market conditions – including targeted reductions in output and the difficult decision to close our facilities in Seattle, Washington, and Houston, Texas. These actions were not taken lightly, and we recognise the impact on our teams and communities. Encouragingly, performance improved in the latter part of the year, with fourth-quarter EBITDA showing positive momentum.

The world experienced another record-breaking year for global temperatures in 2024. We are determined to play our part in helping to mitigate the worst effects of climate change. We have some powerful levers to help make a difference and have set targets for the business as a whole.

Renewable electricity is a key pillar of our Emissions strategy and we remain on track to meet our Ardagh Group-wide target of sourcing 100% of electricity from renewable sources by 2030. In 2024, AMP achieved 30% renewable electricity across its operations, while AGP reached 20%, reflecting continued progress driven by recent investments.

Innovation is key to the transformation of our industry. Our 2024 initiatives included signing a Power Purchase Agreement (PPA) with the [Sunnic Lighthouse](#) GmbH photovoltaic provider. This will cover a portion of the electricity needs for both AGP and AMP – a first for the Ardagh Group. The renewable power will be used in the groundbreaking NextGen furnace in Obernkirchen, Germany. Our ambition is to switch from 90% gas and 10% electricity to 80% renewable electricity and 20% gas. This transition will, we estimate, reduce the Scope 1, 2 and 3 emissions from glass packaging production at the facility by 65-70%.

We were glad to see the new furnace technology receiving a ThinkBig! Award for complex energy transition projects from the German Energy Agency. Other strategic renewables investments included the signing of PPAs in Bulgaria, Holland, Portugal and Scotland – all of which support more low-carbon energy in the overall mix.



**Herman Troskie**  
Chair, Ardagh Group



**Oliver Graham**  
CEO, Ardagh Metal Packaging



**Mike Dick**  
CEO, Ardagh Glass Packaging

## Certifications:



## A message from our executive leadership team continued

The AMP business has grown production and sales year on year, but we remain committed to reducing our environmental impacts. We have again exceeded our 2030 Scope 3 emissions reduction target, with significant investments in our supply chain, sourcing aluminium coils with a lower carbon footprint. Within the business, our technology teams have developed new lightweighting and downgauging techniques to produce high quality cans using less aluminium.

Ardagh Group's Ecology pillar includes our commitment to aspire to source raw materials sustainably and to raise awareness of both aluminium and glass's role in a circular economy. In both businesses, our focus is on increasing recycling rates and the proportion of recycled content in our packaging.

Our aluminium beverage cans now have an average global recycled content rate of 78%, one of the highest in the industry, with demand increasing for the world's most recycled beverage package. For years, we have been collaborating with the industry to improve knowledge and performance on aluminium packaging. It was great to see the new, standardised Beverage Can Recycled Content (BCRC) methodology being adopted industry-wide during 2024.

At AGP, cullet is vital to our recycled content strategy. There have been ongoing challenges in accessing sufficient material across several of our operating regions, which we continued to address in 2024 through targeted investments in glass collection initiatives. In South Africa, our money4glass initiative is

supporting glass collection and recycling rates. A digital payments system has incentivised collection at all scales – from waste pickers to recycled glass wholesalers, leading to an increase of cullet available in the market.

In the US, in Chicago, we joined a consortium which encourages businesses to divert glass from landfill. The initiative, which includes major beverage manufacturers, is raising awareness of glass's circular potential and increasing the availability of cullet for local manufacturers. In Europe, AGP made a strategic investment during 2024 in a leading Swedish glass recycling company. The acquisition will protect the local supply of cullet during a time of regulatory changes.

We placed great emphasis on our Social pillar during 2024. An increased focus on training and action plans has led to improvements to our health and safety metrics in both AMP and AGP production facilities. This includes reductions in injury rates related to slips, trips and falls, as well as a decrease in recordable incidents.

Our Ardagh for Education programme continued to grow during 2024. We are on track to reach our target of 1.2 million students, with grants of US\$13 million to a wide variety of schools in all the regions where we operate. In January 2024, we were able to expand our programme to Brazil. A multi-year investment with local non-profit SESI will support STEM learning in communities across the country.

Following the successful integration of Ardagh Glass Packaging Africa (AGP-Africa), acquired in 2022, we have established a new Centre of Excellence in Cape Town, South Africa. This facility serves as a hub for STEM education and development, supporting talent from across our operations on the continent – in South Africa, Ethiopia, Nigeria and Kenya. In addition to fostering regional skills, the Centre also helps connect individuals to global opportunities within the Ardagh Group. It complements a range of other Community Involvement Projects such as biodiversity and recycling initiatives.

From a cultural perspective, we were pleased to see very high engagement in our global employee survey. The feedback emphasised opportunities in communications, which we have acted upon with new digital channels and more occasions for teams to interact with senior management.

It's rewarding to see our sustainability progress being recognised externally. We commend our teams for their continued efforts, achieving an EcoVadis Gold ranking during the year for their management of sustainability issues. And we were pleased to see Merck Life Science naming AGP as 'Outstanding Partner'. The team achieved high scores for supply resilience, collaboration and sustainability in supplying containers to the pharmaceutical and chemical-technical sectors.

The challenges we face as a community and businesses are not getting simpler. But our commitment to people and the planet remains firm. We are working to increase the supply of more circular products and reduce our impacts. And we will create more opportunities for the communities we serve and recruit from, fulfilling our promise – to make packaging for good.





# Progress to targets



We remain committed to the sustainability objectives articulated in our sustainability strategy. In 2024, despite annual sales volume growth of 3%, we continued to make significant progress against all our targets.

## Our progress to targets – 2020 baseline year

	Metric <sup>1</sup>	Target to 2030 unless otherwise stated	Status
Emissions	Renewable electricity	100%	30% Progress to target
	Absolute Scope 1 & 2 GHG emissions	42% reduction	2% increase from 2020 <sup>2</sup>
	Absolute Scope 3 GHG emissions	12.3% reduction	Stated target met during 2024
	VOC emissions intensity	10% reduction	89% Progress to target <sup>3</sup>
Ecology	Water withdrawal intensity	20% reduction	30% Progress to target <sup>5</sup>
	Zero waste to landfill by 2025 <sup>4</sup>	100%	83% Progress to target

1. The Research Institutes of Sweden (RISE) provided limited assurance of the acquisition, processing and aggregation of the quantitative data necessary to calculate the principal 2024 environmental and health and safety KPIs reported.  
 2. Market-based approach used.  
 3. Intensity metrics shown include can body production facilities only (excluding Huron, Ohio - since this facility produces both cans and ends), as water and VOC emissions from ends production is insignificant.  
 4. Zero waste to landfill applies only to operational waste streams and is implemented in accordance with internal standards and local regulations.

## How we got there

**Renewable electricity:** We secured more renewable electricity coverage, increasing the total by 10% in 2024 from 2023 levels, to 30% across our global footprint. This included a new 46% total for Europe, up from 35% in 2023 and 43% for South America, as well as an increase of 10% in North America.

We have invested in Power Purchase Agreements (PPA) including a new contract with Sunnic Lighthouse GmbH in Germany and BNZ in Portugal. The PPA will secure solar energy allocation across our European facilities, facilitating our 100% renewable electricity transition. The Transition Plan section has more detail on our PPA activities and how we aim to meet our target.

**Scope 1 and 2 GHG emissions:** In 2024, our combined absolute total was 2% higher than in the 2020 baseline year, despite a significant increase in sales. During this period, we made significant improvements in efficiency, reducing our Scope 1 and 2 emissions intensity by 18% compared to the baseline. In fact, our combined absolute Scope 1 and 2 emissions were 10% lower than in 2023. This was primarily the result of a US\$3.8 million investment in operational efficiency and renewable electricity, reducing energy demand.

**Scope 3 emissions:** Our total for 2024 reduced compared to 2023, and we exceeded our 2030 target significantly, reaching a 25% reduction from the baseline year. The proportion of recycled content in our cans was one of the highest in the industry at 78% in 2024 versus 64% in 2020. We aim to continue this positive momentum and secure more sources of recycled metal to reduce Scope 3 emissions further.

**VOC intensity:** This continues to be on track with a 9% reduction in 2024 compared to our baseline year of 2020, meaning that we have progressed 89% towards our 2030 target. This follows an investment of US\$2.4 million in a combined new technology and materials approach.

**Water intensity:** We reached 30% of our water intensity target in 2024, an improvement of 5% compared to 2023, and as part of our water roadmap, we have identified projects that we deem suitable to achieve the targeted reduction. In all our operating regions, we are taking key steps to reduce our water consumption and to protect this valuable resource.

**Waste to landfill:** During 2024, 83% of our plants achieved zero-waste to landfill (ZWTL). Based on 2024 progress, we believe we are well positioned to meet our 2025 target of 100% ZWTL for all our plants.

## Progress to targets continued



We remain committed to the goals outlined in our sustainability strategy, which focuses on reducing GHG emissions, conserving natural resources and minimising environmental impacts across our global operations.

### Our progress to targets – 2020 baseline year

	Metric <sup>1</sup>	Target to 2030	Status
Emissions	Renewable electricity	100%	22% Progress to target
	Absolute Scope 1 & 2 GHG emissions	42% reduction	38% Progress to target <sup>2</sup>
	Absolute Scope 3 GHG emissions	12.3% reduction	81% Progress to target <sup>2</sup>
Ecology	Water withdrawal intensity	26% reduction	4% increase from 2020
	Zero waste to landfill <sup>3</sup>	100%	35% Progress to target

<sup>1</sup> The Research Institute of Sweden (RISE) provided limited assurance of the acquisition, processing and aggregation of the quantitative data necessary to calculate the principal 2024 environmental and health & safety KPIs reported.

<sup>2</sup> Market-based approach used.

<sup>3</sup> Zero waste to landfill applies only to operational waste streams and implemented in accordance with internal standards and local regulations.

### Our Refreshed 2030 Sustainability Targets

As part of our ongoing commitment to sustainability, we periodically review and refine our targets to ensure they reflect our strategic priorities and deliver meaningful impact. In 2024, we revisited our 2030 goals to sharpen our focus on the areas where we can drive the greatest value – for our business, our customers, and the environment.

This refreshed set of targets reflects our intention to prioritise voluntary actions that go beyond compliance and align with the expectations of our stakeholders and the needs of a low-carbon, circular economy.

### How we got there

**Renewable electricity:** In 2024, AGP increased its renewable electricity coverage to 22%, up from 17% in 2023 and 13% in 2020, reflecting continued momentum in our energy transition. Progress was largely driven by initiatives in AGP-Europe (>50% in 2024), where long-term strategy and procurement efforts have secured over 80% renewable electricity coverage through 2030.

Looking ahead, our project pipeline includes multiple large-scale Power Purchase Agreements (PPAs) that will advance our global targets, with a particular focus on European deployment in the second half of the decade. In AGP-North America, commissioning of a solar installation at our Madera, California facility is expected in 2025, and we are actively negotiating additional opportunities across North America and Africa to further expand our pipeline.

**Scope 1 and 2 GHG emissions:** AGP’s combined Scope 1 and 2 GHG emissions decreased to 3,415,526 tonnes in 2024, a 12% reduction from 2023 and 16% lower than 2020 levels. These improvements were driven by renewable electricity adoption, new technologies, energy efficiency gains, and a shifting operational footprint. Emissions performance was influenced

by permanent production curtailments in North America and temporary curtailments in Europe, which contribute to short-term reductions that may reverse as capacity returns.

Our decarbonisation efforts continue through strategic investments, including our NextGen Furnace in Obernkirchen and our hydrogen electrolyser in Sweden, supporting future fuel-switching potential.

**Scope 3 GHG emissions:** AGP’s Scope 3 emissions totalled 1,709,702 tonnes in 2024 – a 9% decrease from 2023 and 10% below our recalculated 2020 base year. We undertook this strategic recalculation to apply enhanced methodologies and more robust data, improving the accuracy of our baseline and strengthening year-on-year comparability going forward. The 2024 reduction was largely driven by facility closures in North America, though partially offset by growth in Africa. Looking ahead, we remain focused on deepening supplier engagement and expanding circularity initiatives to accelerate long-term reductions across our value chain.

**Water intensity:** In 2024, AGP achieved a water intensity of 1.02 m<sup>3</sup> per ton of packed glass, an improvement from 1.17 m<sup>3</sup> in 2023, though still above 2020 levels. Our European operations continue to lead in water conservation, but overall progress was tempered by increased usage in North America and the closure of high-performing facilities in the region. Water stewardship remains a priority across all AGP facilities.

**Waste to landfill:** In 2024, AGP increased its Zero Waste to Landfill (ZWTL) rate to 35%, up from 29% in 2023 and 32% in 2020. This performance was primarily driven by AGP-Europe, where waste minimisation efforts are well established. Notably, this year also marked a milestone in Africa, where a facility was internally designated ZWTL for the first time, supported by the region’s renewed “Waste Warriors” strategy. We continue working toward broader adoption of ZWTL practices across all operations.





# ESRS 2 General disclosures

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# ESRS 2: General disclosures

## Strategy, business model and value chain

### About Ardagh Group

SBM-1-40(a-c)

Welcome to our sustainability report for the year ended 31 December 2024.

Our sustainability strategy is built on three key pillars: Emissions, Ecology and Social. Our goal is to create packaging for good by minimising our GHG emissions, reducing our environmental footprint and promoting circularity to minimise our impact on the planet. We are committed to investing in our people and the communities we serve.

To help us achieve our sustainability goals, we continuously track, monitor and measure our progress. By promoting circularity and minimising environmental impact, our metal and glass packaging products stand out for their high recyclability, addressing both sustainability ambitions and the needs of our customers.

### AMP

AMP is a leading global supplier of sustainable and inherently recyclable metal beverage cans to brand owners across Europe, North America and Brazil, with innovative production capabilities.

AMP operates 23 production facilities in nine countries, with revenue of approximately US\$4.9bn in 2024.

AMP is a packaging supplier for beverage companies; AMP is known for its outstanding quality and customer service and is one of the only pure-play metal beverage can producers of scale in the market today.

As of 2024, AMP employs approximately 6,200 individuals across its operations, excluding joint ventures and non-consolidated subsidiaries. The regional distribution of our workforce is as follows:

- **AMP-Europe:** 3,402 employees, across facilities in the UK and Germany, Poland, the Netherlands and other EU countries
- **AMP-North America:** 1,820 employees, primarily in the US
- **AMP-South America:** 946 employees, located in Brazil

### AGP

AGP operates manufacturing facilities across the US, Europe and Africa with revenue of US\$4.2bn in 2024, producing primarily soda-lime glass containers for beverages, food and spirits, and to a lesser extent, pharmaceutical packaging. During the reporting period, AGP's product and service offerings remained materially consistent, with no significant additions or removals.

As of 2024, AGP employs more than 12,000 individuals across its operations, excluding joint ventures and non-consolidated subsidiaries. The regional distribution of our workforce is as follows:

- **AGP-Europe:** 6,096 employees, across facilities in Germany, Poland, the Netherlands and other EU countries
- **AGP-North America:** 3,934 employees, all within the US
- **AGP-Africa:** 2,817 employees, located in South Africa, Nigeria, Kenya and Ethiopia

At Ardagh Group we are not aware of any bans or restrictions on our products or services in the jurisdictions where we operate.

## Sustainability-related goals

SMB-1-40(e)

Ardagh Group's sustainability-related goals are centred on metal and glass containers and are consistently applied across our four regional operations: Europe (AMP-Europe and AGP-Europe), North America (AMP-North America and AGP-North America), South America (AMP-South America) and Africa (AGP-Africa). We have adopted near-term Science-Based Targets (SBTi) to reduce our GHG emissions, which are globally applicable across all regions:

- an absolute reduction of 42% in Scope 1 and 2 emissions by 2030, compared to a 2020 baseline
- a 12.3% absolute reduction in Scope 3 emissions by 2030.

While these targets apply at the corporate level, the associated reductions will not be distributed equally across all regions, facilities or furnaces. Some facilities may contribute a larger share of the reductions due to technological readiness, investment timing, or regional regulatory and market conditions.

In addition to our climate goals, Ardagh Group is committed to reducing VOC. Targets for VOC intensity reduction (AMP) is targeted at a 10% reduction by 2030.

Ardagh Group has also committed to improving water stewardship, with a 20% (AMP) and 26% (AGP) reduction in water intensity targeted by 2030 across all operations. We are also advancing circularity through increased use of recycled content in both our metal and glass packaging, supporting both resource efficiency and emissions reduction.

All regions are aligned on achieving zero waste to landfill (ZWTl) by 2025 (AMP) and by 2030 (AGP). AGP-Africa is targeting an accelerated 2025 milestone for its South African operations, in response to specific regulatory and operational drivers in the region.





## ESRS 2: General disclosures continued

### Sustainability-related goals continued

SMB-1-40(e)

**Emissions & Ecology**

#### Minimise our GHG emissions

- Approved SBTi targets
- Transition to 100% renewable electricity
- Implement energy efficiency projects
- Increase recycled content
- Innovate in product design
- Source sustainably
- Partner on low carbon transport
- Minimise VOC emissions

#### Minimise our ecological impact

- Achieve excellence in water management
- Promote zero waste to landfill across all facilities
- Support increased recycling management and use of recycled content
- Promote circularity narratives across all facilities on use of infinitely recyclable material

**Social**

#### Our people & our communities

##### Our people

- Maintain a safe and healthy workplace
- Promote diversity, equity and inclusion (DE&I)
- Empower our people to participate in impactful social initiatives in our local communities

##### Our communities

- Strengthen our local communities by participating in community projects and making charitable donation
- Continue our investments in Ardagh for Education

#### Sustainability Filter

Sustainability only has a sustainable impact if it is economically viable both long and short term



## ESRS 2: General disclosures continued

### Products, markets and customers

SBM-1-40(f)

#### AMP

AMP is one of the leading producers of aluminium beverage cans – the world’s most recycled beverage packaging. Made from a durable metal that can be reprocessed with minimal losses, we believe our products can play a key role in a more circular economy, reducing environmental pollution and emissions.

As a manufacturer with a complex supply chain and present in multiple locations, we work to achieve the best environmental performance economically possible. We are committed to identifying, measuring and improving outcomes in all aspects of our value chain – from the energy we procure, to the sources of our metal and how our products are collected and recycled.

#### AGP

AGP’s glass container product portfolio aligns with circularity principles due to its recyclability and inert composition. Across our three regions, we strive to increase our use of post-consumer recycled (PCR) content, with strong customer demand supporting this trend.

Operationally, all AGP regions are implementing energy efficiency projects, waste minimisation practices and water management initiatives in line with our SBTi, water intensity and zero waste to landfill (ZWTL) targets. AGP-Europe already has multiple facilities operating near or within the boundaries of our 2030 water reduction and ZWTL targets. In AGP-Africa, we are accelerating progress toward our ZWTL and circularity goals by expanding glass collection through our money4glass initiative, supported by infrastructure investments and partnerships with regional recyclers. At the same time, our Waste Warriors programme is advancing site-level waste reduction and driving engagement around responsible materials management.

Across all regions, customer sustainability targets and evolving regulatory frameworks are reinforcing demand for circular packaging and low-carbon operations, further aligning AGP’s product portfolio with its long-term sustainability goals.

### Elements of strategy that relate to or impact sustainability matters

SBM-1-40(g)

#### AMP

Our focus is on reducing energy consumption and emissions to their lowest economically feasible levels, while maximising recycling rates and optimising materials usage. We also place great importance on responsible waste management, avoiding landfill usage and striving to minimise water consumption wherever possible.

With a high raw material value and their relative simplicity to recycle, we believe metal beverage cans contribute to a sustainable, closed-loop system. Promoting industry-wide recycling and the use of recycled content is a critical step towards achieving our Scope 3 GHG emissions reduction targets.

Achieving global decarbonisation requires industry-wide action. To drive an increase in the recycled content in our products, we partner with both suppliers and customers. Together, we are identifying strategic initiatives to lower emissions, such as reducing material usage, lightweighting aluminium cans without compromising quality, and optimising logistics to lower fuel consumption. Our procurement strategy and collaboration with suppliers have helped us to achieve high rates of recycled aluminium in our cans.

At AMP, our key strategic levers are:

- Reducing energy usage and driving efficiencies in all our operations
- Transitioning to renewable electricity and alternative low-carbon thermal solutions
- Reducing material consumption through product design and increasing recycled content use in aluminium
- Identifying technologies and promoting further low-carbon aluminium sourcing
- Reducing water use and waste while maintaining operational efficiency
- Adapting to evolving regulatory and customer expectations around circularity and decarbonisation

#### AGP

Ardagh Group’s sustainability strategy is anchored in three sustainability pillars: Emissions, Ecology and Social. These pillars are embedded across regional operations and drive investment decisions, operational priorities and stakeholder engagement.

Key challenges include:

- Transitioning to low-carbon energy in an energy-intensive industry
- Reducing water use and waste while maintaining operational efficiency
- Adapting to evolving regulatory and customer expectations around circularity and decarbonisation
- Managing cost pressures from energy market volatility and inflation
- Navigating the price volatility, quality variability and regional availability of post-consumer recycled glass (cullet), which is essential for reducing emissions and increasing circularity

To address these, AGP is implementing critical projects including:

- NextGen Furnace (Germany): a hybrid furnace enabling lower-carbon melting using renewable electricity.
- Hydrogen Electrolyser (Sweden): advancing the feasibility of hydrogen fuel in glass production.
- Zero waste to landfill, and water efficiency programmes: with region-specific targets and infrastructure upgrades, such as closed-loop systems
- Cullet quality initiatives: working with local recyclers and industry associations to improve cullet feedstock and reduce contamination

[🔗 For more detail, see NextGen Furnace \(Germany\) and Hydrogen Electrolyser \(Sweden\) \(pg. 36\)](#)

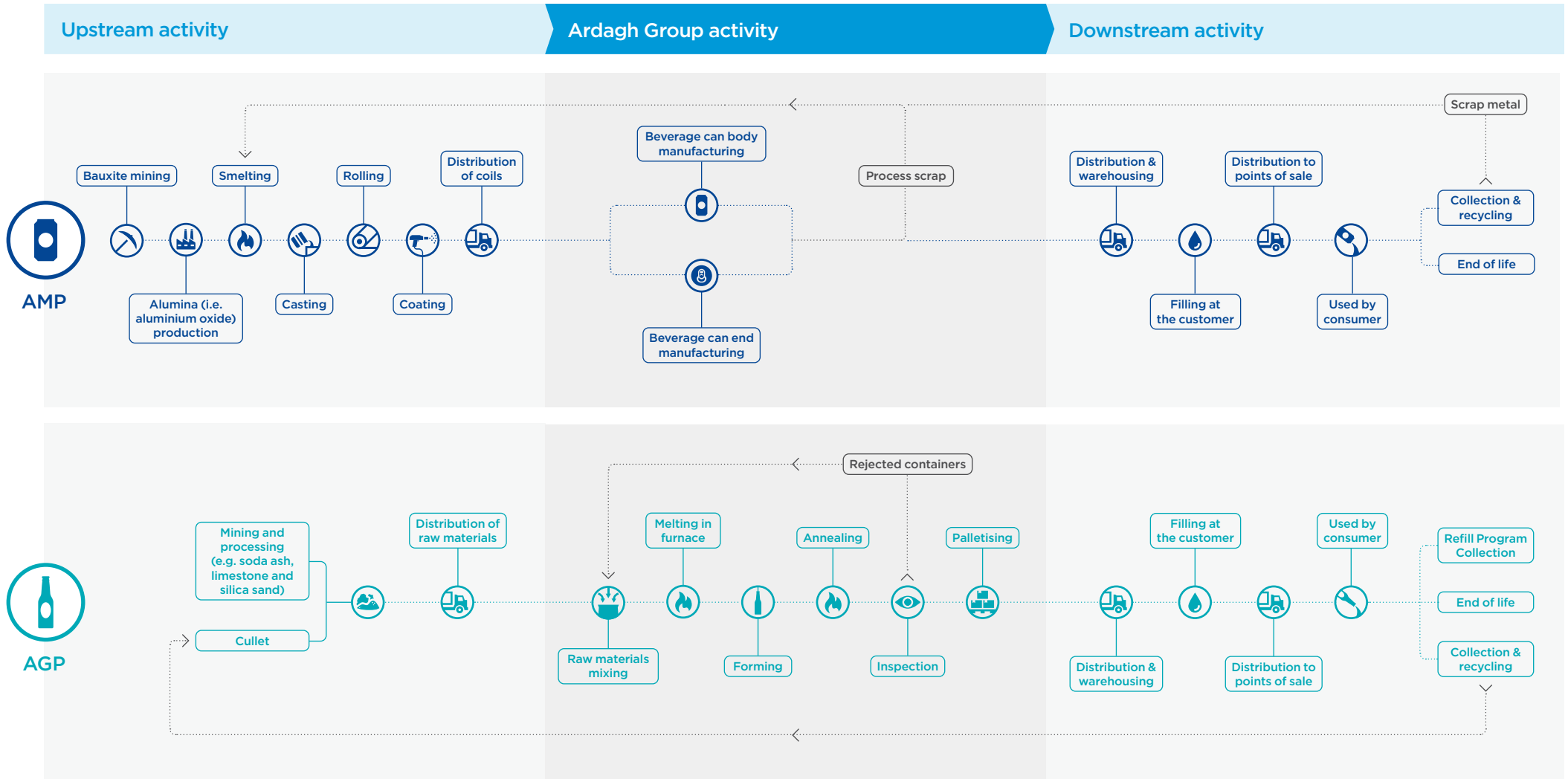
These projects also directly support AGP’s regional sustainability goals.



## ESRS 2: General disclosures continued

### Strategy, business model and value chain

SBM-1-42(c)



**ESRS 2: General disclosures** continued**Inputs and approach to gathering, developing and securing those inputs**

SBM-1-42(a)

Energy inputs for Ardagh Group vary by region and include, but are not limited to, natural gas and electricity from both grid and renewable sources. Water is drawn from local municipal or surface/groundwater systems, with closed loop reuse wherever possible.

**AMP**

AMP's key inputs include metal coils (prime and recycled) and coatings, along with energy, water and skilled labour. Materials are procured through supplier contracts, with due diligence applied to environmental and labour practices, see ESRS S2 for more information.

**AGP**

AGP's key inputs include soda ash, silica sand, limestone and post-consumer recycled glass (cullet), along with energy, water and skilled labour. Where available, we source cullet from municipal and commercial recycling systems, with support from industry associations and partnerships that help enable collection and processing infrastructure (e.g., FEVE in Europe and The Glass Recycling Company in South Africa). We procure raw materials such as silica sand and soda ash through supplier contracts, with due diligence applied to environmental and labour practices.

**Outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders**

SBM-1-42(b)

**AMP**

AMP's primary output is metal containers for use in beverage applications. These outputs are produced to meet stringent safety, recyclability and performance standards, which enable downstream sustainability benefits for customers and end-users.

For customers, we believe AMP's packaging supports lifecycle emissions reductions, improved recyclability and brand alignment with sustainability goals. For investors, our focus on operational efficiency, decarbonisation and waste reduction contributes to long-term resilience and value creation. Employees and local communities' benefit through workforce development programmes and social investment initiatives.

Expected outcomes over the medium to long term include continued emissions reductions (via SBTi-aligned targets), improved water stewardship, higher circularity through increased recycled aluminium and enhanced regulatory compliance across markets. We expect these outcomes to contribute AMP's reputation as a sustainability-aligned supplier and employer.

**AGP**

AGP's primary outputs are glass containers for food, beverage and pharmaceutical applications. These outputs are produced to meet stringent safety, recyclability and performance standards, which enable downstream sustainability benefits for customers and end-users.

For customers, we believe AGP's packaging may support lifecycle emissions reductions, improved recyclability and brand alignment with sustainability goals. For investors, our focus on operational efficiency, decarbonisation and waste reduction may contribute to long-term resilience and value creation. Employees and local communities may benefit through workforce development programmes and social investment initiatives.

Expected outcomes over the medium to long term include continued emissions reductions (via SBTi-aligned targets), improved water stewardship, higher circularity through increased cullet use and continued focus on regulatory compliance across markets. We expect these outcomes to contribute to AGP's reputation as a sustainability-aligned supplier and employer.

**Features of its upstream and downstream value chain**

SBM-1-42(c)

**AMP**

AMP occupies a midstream position within the packaging value chain. We transform prime and recycled materials into finished metal containers for use in the beverage sectors.

Upstream, AMP sources metal coils from global and regional suppliers. Energy is supplied by utilities and private contracts, with increasing attention to renewable sourcing. Key upstream partners include raw material suppliers, equipment manufacturers and industry recycling systems.

Downstream, AMP delivers products to a customer base that includes multinational brand owners as well as small and medium-sized local and regional producers. End-of-life recovery and recycling is supported by partnerships with industry consortia, local municipalities and recyclers. While AMP does not directly control post-consumer recovery, our product design and stakeholder engagement strategies promote recyclability and circularity across markets.

**AGP**

AGP occupies a midstream position within the packaging value chain. We transform raw and recycled materials into finished glass containers for use in the food, beverage and pharmaceutical sectors.

Upstream, AGP sources materials such as silica sand, soda ash, limestone and cullet from global and regional suppliers. Energy is supplied by utilities and private contracts, with increasing attention to renewable sourcing. Key upstream partners include raw material suppliers, equipment manufacturers and industry recycling systems.

Downstream, AGP delivers products to a customer base that includes multinational brand owners as well as small- and medium-sized local and regional producers. End-of-life recovery and recycling is supported by partnerships with industry consortia, local municipalities and recyclers. While AGP does not directly control post-consumer recovery, our product design and stakeholder engagement strategies promote recyclability and circularity.

## ESRS 2: General disclosures continued

### Basis for preparation

#### Consolidated sustainability reports

BP-1-5(a-b)

This report presents information on Ardagh Group SA and its consolidated subsidiaries (together, referred to herein as Ardagh Group except as otherwise indicated below.

Ardagh Group's operations have the following operating businesses: Ardagh Metal Packaging (AMP) and Ardagh Glass Packaging (AGP). These businesses represent the core of our operations and are central to our environmental, social and governance (ESG) impacts. Except where the context otherwise requires or where otherwise indicated, all references to "we," "us" and "our" refer to Ardagh Group or to one of its operating businesses. See Note 1 to the audited consolidated financial statements included in our 2024 Annual Report for further information on our corporate structure.

In line with our reporting approach, we have concentrated on entities that materially contribute to our overall ESG footprint. Accordingly, this report excludes certain subsidiaries within the scope of the AMP operating business (Hart Print Inc.; Hart Print USA; Nomoq GmbH; and Nomoq Limited) and the AGP operating business (Heye International GmbH; Svensk Glasåtervinning).

Our environmental reporting includes only data from (i) our manufacturing facilities, as these facilities represent the primary sources of our environmental impact and (ii) relevant aspects of our value chain, in line with our materiality assessment. Non-manufacturing locations – such as sales offices and warehouses – are excluded from our environmental reporting due to their immaterial contribution to our overall environmental footprint.

Our health and safety and employee-related reporting includes data from all operational production facilities, including manufacturing locations and office environments.

#### Reporting frameworks and standards

BP-2-15

We have prepared this report to provide stakeholders with transparent and relevant information on our ESG performance for the reporting period ending 31 December 2024.

As of the date of this report, the European Union's (EU) new Corporate Sustainability Reporting Directive (CSRD) and the related European Sustainability Reporting Standards (ESRS) are scheduled to apply from 2028 (on year 2027 information). Although CSRD is not currently in force with respect to Ardagh Group, we have proactively begun aligning our reporting practices with the CSRD and ESRS. Therefore, while this report is not fully CSRD-aligned, we have developed it with the goal of integrating the current CSRD and ESRS structure to the extent practicable. However, the CSRD and ESRS are currently subject to an ongoing legislative review and therefore such requirements, as well as our own approach to sustainability reporting, may continue to evolve.

Additionally, we follow standardised reporting frameworks, including the Greenhouse Gas Protocol, for our ESRS E1 disclosures on GHG emissions.

Data in this report is based on our internal monitoring systems, external verification (where available) and best estimates in areas where precise measurement remains challenging.

This report outlines why sustainability is relevant to the Ardagh Group's business as well as our priorities and decarbonisation roadmap to 2030, how we measure progress and our approach to managing our goals.

We publish information on our economic performance in our annual financial reports and in our quarterly interim financial reporting. This report affirms our commitment to the United Nations Global Compact (UNGC) and is a supplement to our Communication on Progress (COP), which we completed in June 2024.

#### Extent the sustainability report covers our value chain

BP-1-5(c)

This Sustainability Report has been prepared with consideration to our upstream and to a more limited extent, downstream value chain activities, in addition to our own operations. Our carbon footprint reporting follows a cradle-to-gate system boundary and therefore does not include downstream emissions beyond Ardagh Group's operational control.

We have limited downstream data beyond our cradle-to-gate system boundary but will continue to evaluate this as we evolve our stakeholder expectations and data availability.

Our assessment of impacts, risks and opportunities (IROs) covers the whole value chain. Each chapter will feature an IRO table disclosing our assessments of impacts, risks and opportunities for each sub topic. We have considered different value chain impacts when defining relevant targets, metrics and actions. As examples of value chain considerations, our GHG target covers sources of emissions from Ardagh Group's own operations, as well as our upstream value chain activities.

#### Exemptions and omitted information

BP-1-5(d-e)

In regard to intellectual property and knowhow, we have not omitted any information. This report does not include matters in the course of negotiation, unless publicly disclosed and deemed relevant to report.

#### Disclosure in relation to specific circumstances

##### Time horizons

BP-2-9(a-b)

In this report, we define time horizons as: short-term – up to 1-year; medium-term – 1-5 years; long-term – 5+ years.

##### Value chain estimation

BP-2-10(a-d)

Estimates and judgements used in reporting are reviewed annually. We use estimated data for selected upstream and downstream Scope 3 emissions categories if primary, supplier-specific data is unavailable. We prepare these estimates in accordance with the GHG Protocol and ESRS guidance as of the date of this report and apply them to the following Scope 3 categories: purchased goods and services; fuel- and energy-related activities; upstream transportation and distribution; and waste generated in operations.

To ensure consistency and transparency in our approach, Ardagh Group follows a tiered estimation hierarchy. First, we apply the most recent emissions factors provided by suppliers or business partners. If current supplier-specific emissions factors are unavailable, we rely on the latest previously provided data. Where neither current nor historical company-specific factors exist, we default to sector- or region-specific emissions factors from recognised external databases, such as DEFRA or Ecoinvent. Depending on the activity type, we apply appropriate methodological approaches – such as the supplier-specific method, average product emissions, or distance-based calculations.

This estimation framework supports traceable, methodologically consistent Scope 3 reporting, and is aligned with AMP and AGP's CDP Climate Change disclosures. As data quality improves and supplier engagement increases, Ardagh Group's aims are to progressively reduce reliance on secondary data sources.



## ESRS 2: General disclosures continued

Where supplier-specific data is unavailable – such as for purchased goods and energy-related activities – estimates are considered reasonably accurate and reflective of Ardagh Group's operations. Where sectoral averages or proxy data are used – such as for upstream transportation or non-hazardous waste – estimates are subject to greater uncertainty due to assumptions about geography, supplier practices, and product composition. Ardagh Group qualitatively classifies these estimates based on its data hierarchy and underlying assumptions. While no quantitative confidence intervals or statistical margins of error are currently applied, known limitations are disclosed through CDP and will be further addressed in future reporting cycles as methodologies and data quality improve. Any changes in estimates are disclosed in the period when the revised data becomes available.

We are actively improving the accuracy of our value chain-related sustainability data, with a particular focus on Scope 3 emissions, where primary or supplier-specific data can be limited. Our planned actions include expanding direct engagement with upstream suppliers to improve data availability for categories such as purchased materials, fuel- and energy-related activities, and transportation. We are also investing in digital infrastructure to enhance data traceability, validation and integration across the supply chain and we have implemented an ESG data management platform to improve data granularity, reduce reliance on proxy values and support audit readiness.

### Sources of estimation and outcome uncertainty

BP-2-11(b)

Quantitative metrics disclosed in this report may include measurement uncertainty due to data quality, availability and reliance on estimation techniques. Where primary data is unavailable, we use assumptions based on prior-year data, sector averages, or supplier engagement (such as DEFRA emission factors for Scope 3 calculations and standard conversion factors for estimating raw material usage). We review these assumptions and proxies annually and maintain internal documentation to support transparency and consistency. In this report, we have not identified any metrics with a high level of uncertainty.

### Changes in metrics or methodology

BP-2-13(a)

AGP's 2023 sustainability reporting includes changes in boundary and data coverage due to the full-year integration of AGP-Africa (formerly Consol Glass), which we acquired in April 2022, adding seven production facilities across South Africa, Nigeria, Kenya and Ethiopia to AGP's operational scope.

The expansion affected environmental and workforce-related metrics and improved the representativeness of AGP's consolidated disclosures. We made no changes to measurement methodologies, data sources or KPIs beyond the boundary update.

### Disclosure of revised comparative figures

BP-2-13(b)

AGP has revised its 2020 baseline data for Scope 1, Scope 2, and Scope 3 GHG emissions, as well as water intensity, to reflect the full-year integration of AGP-Africa. These adjustments expanded AGP's operational boundary and ensure consistency and comparability across year-over-year metrics, 2030 environmental reduction targets and alignment with the Science Based Targets initiative (SBTi) and internal KPI frameworks.

This is AGP's first reporting cycle under CSRD-aligned standards. Aside from the boundary-driven revisions to the 2020 baseline, we made no other adjustments to comparative figures at the time of reporting.

No revisions were required for AMP comparatives.

### Material errors

BP-2-14(a)

We have not identified any material errors in prior sustainability disclosures that require correction or clarification in this reporting cycle. This is Ardagh Group's first CSRD-aligned report and previous sustainability reports, including those provided to CDP and other frameworks, have not been restated for error correction purposes.

### Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

BP-2-15

Ardagh Group's sustainability report is aligned with selected elements of frameworks, the UN Global Compact principles and voluntary submissions to CDP for climate and water reporting.



## ESRS 2: General disclosures continued

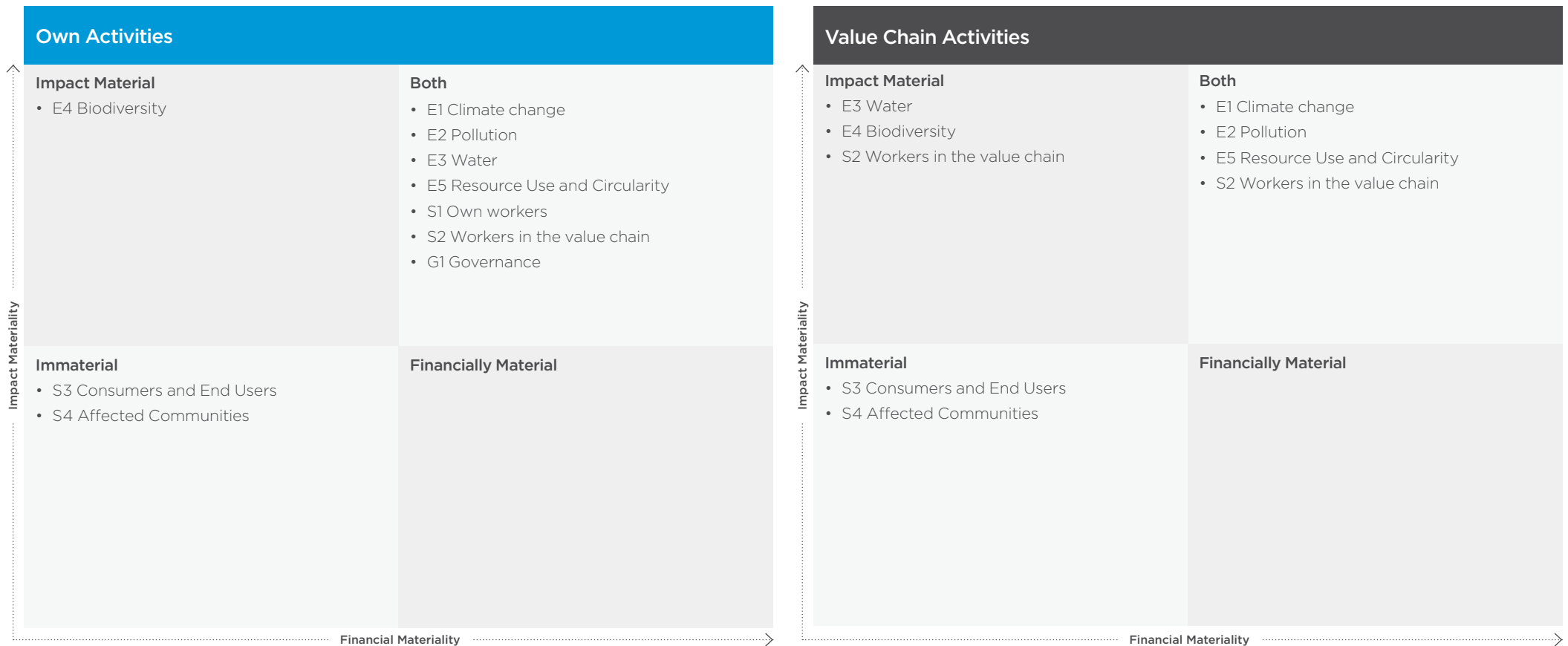
### Double materiality assessment

#### Material impacts, risks and opportunities and their interaction with our strategy and business model

SBM-3

##### Materiality matrix and methodology

Our materiality matrix provides a high-level overview of the most significant topics identified through our DMA. To ensure alignment with our organisational objectives and stakeholder expectations, each ESRS topic was evaluated at a sub-topic level.



## ESRS 2: General disclosures continued

### Double materiality assessment continued

In accordance with ESRS requirements, that is implicit in the date we carried out our first double materiality assessment (DMA) in 2024. This was a key step forward in aligning our sustainability initiatives with both stakeholder expectations and our organisational priorities. This process not only strengthened the foundation of our existing ESG strategy but also deepened our understanding of the impacts and risks that are critical to our operations, stakeholders and the environment.

Building on our previous ESG risk assessment practices, our DMA introduced a more comprehensive perspective by incorporating impact considerations into our risk matrix. Given this is the first year of completing a

DMA, we have applied a conservative scope and threshold, which ensured a robust and reliable representation of our IROs and formed a strong baseline for ongoing refinement and future improvement.

In the table below, for each ESRS topic, we indicate the relevant sub-topics. For example, under ESRS 'E1 Climate Change', sub-topics include 'climate change mitigation', 'climate change adaptation' and 'energy'. Each table includes brief descriptions of the material IROs, along with an indication of whether they relate to our own operations (OO) or our value chain (VC). For impact-related IROs, we also specify whether the impact is positive or negative (-). Further detail on each IRO, including our management approach is in the relevant sections under 'Environment', 'Social', and 'Governance'.

### Key findings and alignment with corporate strategy

The DMA identifies our most material topics, reflecting the priorities of our stakeholders and areas that pose potential risks and opportunities for our operations.

Although some topics were assessed as having lower materiality in this year's evaluation, this does not imply they are unimportant. Rather, they currently hold less relative significance compared to other IROs.

We remain committed to regularly monitoring sustainability topics and reassessing their relevance through an annual review of our DMA. This process ensures we stay responsive to evolving risks and opportunities and aligned with the CSRD as we work toward full compliance.

### IRO table key

- Value chain location
- Time horizon

#### Value chain location

- U** Upstream
- O** Operations
- D** Downstream

#### Time horizon

- S** Short-term (<1 year)
- M** Medium-term (1-5 years)
- L** Long-term (>5 years)

### Our material IROs and corresponding ESRS topics

SBM-3-48(c), SBM-3-49

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>E1 Climate change</b>									
<b>Climate change adaptation</b>		Negative impact	Manufacturing activities require significant energy use, contributing to GHG emissions.		●		●		
		Risk	Risks related to physical changes in climate, such as more extreme weather events, may impact operational efficiency.	●	●				●
		Opportunity	Promoting a circular economy model, including reuse and recycling, can reduce waste and emissions.	●	●	●	●		
<b>Climate change mitigation</b>		Positive impact	Implementing energy-saving measures, efficiency improvements, including waste practices, in the manufacturing process can drastically reduce GHG emissions and contribute to climate change mitigation.		●		●		
		Opportunity	Transitioning to lower-carbon technologies and energy sources can reduce carbon emissions and contribute to climate change mitigation.		●			●	
		Risk	Failure to meet emissions reduction targets or comply with future potential governmental regulations might result in fines or legal action.	●	●	●			●



## ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>E1 Climate change</b> continued									
<b>Energy</b>		Negative impact	Manufacturing activities within glass, particularly, use large amounts of energy contributing to GHG emissions. This includes energy use in production processes such as glass melting, moulding and annealing which can lead to high costs and environmental impacts.		●		●		
		Negative impact	Energy use for production processes within metal such as alumina production and smelting can contribute to GHG emissions and climate change.	●			●		
		Positive impact	Encouragement of proper disposal and recycling can minimise energy usage.		●	●	●		
		Risk	Increasing energy costs could affect the cost of raw materials, operating expenses and overall profitability.	●	●				●
<b>E2 Pollution</b>									
<b>Pollution of air</b>		Negative impact	Glass manufacturing processes such as melting, forming and annealing and aluminium converting processes such as printing and lacquer application create emissions.		●				●
		Positive impact	Using renewable energy sources can reduce the combustion of fossil fuels, decreasing air pollutants.		●			●	
		Positive impact	Adoption of energy-efficient equipment and techniques can lower the emissions from manufacturing activities.	●	●	●			●
		Negative impact	High energy intensity in supplier's mining process can contribute to air pollution.	●					●
<b>Pollution of water</b>		Negative impact	Water used in the manufacturing process can become contaminated with chemicals and heavy metals, contributing to water pollution if untreated.		●			●	
		Positive impact	Encouraging water recycling and conservation within manufacturing processes can minimise water wastage and pollution.		●			●	
		Risk	Water scarcity may be accelerated by pollution, leading to increased costs and conflicts over water resources.	●					●
		Opportunity	Enhancing sustainable water management practices can improve the company's environmental footprint and reputation with stakeholders.		●				●
<b>Pollution of soil (and respective loads)</b>		Negative impact	Extraction activities may result in the release of heavy metals and pollutants into the soil (via by-products and wastewaters).	●				●	
		Risk	Soil pollution can impact future land use and cause regulatory complications and sanctions.	●		●		●	

ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon			
				U	O	D	S	M	L	
<b>E3 Water and marine resources</b>										
<b>Water</b>	Water consumption	Negative impact	Manufacturing processes, such as cooling and cleaning, may consume large volumes of water, potentially causing local water scarcity.		●					●
		Risk	Increasing water scarcity due to climate change may increase operation costs or limit production capacities.		●	●				●
		Positive impact	Implementing efficient water management strategies and technologies can lead to significant water savings in the manufacturing process.		●				●	
	Water withdrawals	Negative impact	High volume of water withdrawal from groundwater for operations can lead to falling water tables and water scarcity.	●						●
		Opportunity	Developing a comprehensive water management strategy focusing on the water recycling and engagement in community water stewardship initiatives can add value to business operations and enhance stakeholder relationships.		●					●
		Negative impact	Over-reliance on local water sources for operations can put pressure on community water supplies.	●	●	●			●	
	Water discharges	Risk	Untreated water discharges can lead to severe penalties or operations suspension due to regulatory non-compliance resulting in business loss.	●	●	●			●	
		Positive impact	Regular water quality and/or effluent testing can ensure discharged water is within acceptable parameters, reducing pollution risks.		●				●	
		Opportunity	Improvements in waste management and water use within production facilities can lead to lower waste generation, reducing the volume of discharge into local bodies.	●					●	

## ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>E4 Biodiversity and ecosystems</b>									
<b>Direct drivers of biodiversity loss</b>	Climate change	Negative impact	Manufacturing's direct operations and supply chain can produce high levels of GHG emissions resulting in direct adverse effects on biodiversity.	●	●	●			●
		Opportunity	Implementing energy-saving measures and targets such as achieving 100% renewable energy target by 2030 can help mitigate climate change and indirect impacts on biodiversity loss.		●			●	
	Land-use change, fresh water-use change and sea-use change	Risk	Land or sea-use changes – such as those related to bauxite or limestone mining – can cause long-term environmental harm and reputational damage. Extraction, processing and mining activities within the supply chain may directly contribute to biodiversity loss.	●					●
	Pollution	Negative impact	Manufacturing activities may generate waste and hazardous by-products that, if not managed effectively could harm biodiversity.	●	●				●
		Positive impact	Robust environmental management systems, adherence to local legislative guidelines and application of best practice in waste, water and air pollution management helps mitigate harmful impacts on biodiversity.	●	●				●
<b>Impacts on the extent and condition of ecosystems</b>	Land degradation	Negative impact	Extraction processes can contaminate the soil with heavy metals and other harmful substances. Mining activities, such as bauxite and limestone extraction can lead to significant landscape alteration and land degradation.	●					●



## ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>E5 Resource use and circular economy</b>									
<b>Resource inflows, including resource use</b>		Risk	Dependency on single or limited sources of raw materials can expose supply chain vulnerabilities and price volatility.	●	●		●		
		Opportunity	Continuously improving operational efficiency can reduce the need for resource inputs and lowers operational costs.		●		●		
		Opportunity	Incorporating circular economy principles into supply chain practices can reduce resource inflow, promote recycling and extend the life of raw materials.	●		●	●		
<b>Resource outflows related to products and services</b>		Negative impact	Improper disposal of products by consumers creates waste, contributing to global resource outflows.			●	●		
		Positive impact	Promoting and offering recycling programs for consumers can ensure proper product disposal and reduce resource outflows.			●			●
		Opportunity	Transitioning to resource-efficient machinery or technologies can reduce raw material and energy consumption, thereby minimising resource outflows.		●			●	
		Opportunity	Implementing wastewater and waste recycling programs can reduce resource outflows.		●		●		
<b>Waste</b>		Negative impact	Waste from manufacturing activities can contribute to overall waste volumes if not correctly managed.		●		●		
		Risk	Compliance costs and penalties may arise from non-adherence to waste management regulations.			●	●		
		Opportunity	Offering product return or recycling schemes to customers can reduce waste from product disposal.			●		●	
		Positive impact	Consumers recycling or reusing products can reduce the amount of waste going to landfill.			●	●		

## ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>S1 Own workforce</b>									
<b>Working conditions</b>	Working time, adequate wages, work-life balance	Positive impact	Offering good work-life balance, competitive wages and employment opportunities helps attract and maintain highly skilled personnel.		●		●		
	Social dialogue, freedom of association & collective bargaining	Risk	Failure to engage compliantly in collective bargaining or lack of effective workers representation could lead to strikes, work stoppages and legal disputes.		●		●		
		Positive impact	Respecting the right of workers to form work councils or join labour unions can foster open dialogue, promoting a harmonious and productive work environment.		●		●		
	Health and safety	Risk	Non-compliance with health and safety standards can result in workplace accidents, serious injuries, lost work time and regulatory fines.		●		●		
		Opportunity	The risk of injury to a workforce can be reduced and proactive safety culture enhanced by setting new industry-leading standards and following best practices in health and safety.		●			●	
<b>Equal treatment and opportunities for all</b>	Gender equality and equal pay	Risk	Disregarding gender equality and equal pay laws could lead to legal penalties and reputational damage.		●			●	
	Training and skills development	Risk	Lack of training and development opportunities could decrease employee morale and job satisfaction, lower productivity and increase turnover rates.		●			●	
	Measures against violence and harassment in the workplace	Risk	Mishandling or ignoring cases of harassment or violence can lead to legal penalties and reputational damage.		●		●		

## ESRS 2: General disclosures continued

Sub-topic	Sub-sub-topic	IRO category	Description of material IRO	Value chain location			Time horizon		
				U	O	D	S	M	L
<b>S2 Workers in the value chain</b>									
<b>Working conditions</b>	Working time and adequate wages	Risk	Suppliers not adhering to working time laws and regulations could face regulatory action, impacting supply chain reliability.	●	●			●	●
	Social dialogue, freedom of association & collective bargaining	Risk	Suppliers with poor social dialogue practices could face increased employee turnover, impacting supply chain reliability.	●	●			●	●
	Health and safety	Risk	Workplace accidents or health issues among suppliers can have negative impacts on individuals and impact supply chain reliability.	●	●			●	●
<b>G1 Business conduct</b>									
<b>Corporate culture</b>		Positive impact	Building trust among employees can lead to a more positive and productive work environment, increased collaboration and innovation.		●		●	●	●
<b>Protection of whistle-blowers</b>		Positive impact	A robust whistle-blower policy can prevent mismanagement, unethical behaviour within own operations and the supply chain.	●	●	●	●	●	●
<b>Management of relationship with suppliers</b>		Risk	Customers may be lost if they learn that a manufacturer's suppliers are engaging in unethical practices and if controls are identified as insufficient.	●	●	●		●	



## ESRS 2: General disclosures continued



### A brief description of material IROs resulting from our materiality assessment

SBM-3-48(a)

Our material IROs are concentrated across multiple points in the value chain. Upstream, we are exposed to risks related to raw material availability, energy market volatility and Scope 3 emissions from suppliers. In our own operations, material topics include energy consumption, emissions, waste, water use and workforce health and safety. Downstream, circularity and recyclability are key drivers of risk and opportunity, especially in relation to brand owner expectations, customer engagement and regulatory compliance on packaging design.

These findings are based on our materiality assessment and ongoing stakeholder dialogue, and inform our strategy, investments and sustainability targets.

### Description of the process to identify and assess material IROs

The following sections outline our methodology in detail and present the full results for each topic identified in the DMA:

#### Methodology and assumptions

IRO-1-53(a)

The DMA, conducted in accordance with the guiding principles outlined in EFRAG's Implementation Guidance for Materiality Assessments (IG 1) and ESRS 1 (General Requirements).

Following guidance, we executed our DMA process to assess both impact materiality and financial materiality, determining Ardagh Group's reporting obligations. In identifying our impacts, risks and opportunities (IROs), we considered all sub-sub-topics outlined in ESRS 1.

For inside-out impacts – those on people and the environment – we assessed both positive and negative effects, considering actual and potential sustainability-related impacts. For the outside-in financial perspective, we evaluated sustainability-related risks that could negatively affect our business, as well as opportunities that could provide financial benefits.

Our assessment covered both our own operations and those arising from our business relationships and value chain. While our value chain analysis primarily focused on first-tier suppliers, we also drew on broader industry-wide assessments, sector-specific knowledge, and internal insights gained through participation in relevant forums.

We paid particular attention to the upstream value chain, especially raw materials sourcing and geographic regions that may present elevated risks (potential adverse human and labour rights issues and environmental impacts, reflecting the inherent risk profile of our industry).

## ESRS 2: General disclosures continued

### Process to identify, assess, prioritise and monitor IROs

IRO-1-52(b-h)

Our assessment approach included the following steps:

#### 1. Understanding the context

##### Key business relationships

Our business success is closely tied to our relationships with key stakeholders, including customers, suppliers, employees, communities, investors and industry associations. These relationships form the foundation of our operational and strategic approach, helping us to deliver long-term value and sustainable growth.

Our customers are critical to our performance. To mitigate risks associated with customer concentration, we focus on delivering high-quality, consistent products, as well as providing added value through innovation, customer service and sustainability initiatives. Our strong supplier partnerships support our ability to meet customer expectations and maintain supply chain resilience.

##### Affected stakeholders

Our operations influence a range of stakeholders (including employees, customers, suppliers, communities, investors, regulators and industry associations) with activities that have significant social and environmental impacts. These activities range from job creation and economic contributions to environmental considerations such as GHG emissions and the potential for disturbances in local communities. We recognise our influence and strive to minimise negative impacts and maximising positive outcomes through responsible business practices.

We see strategic value in taking a more active role in industry associations. By leading collaborative initiatives, we can advance sustainability in the metal and glass packaging industries – helping to shape a more sustainable future at the local, regional and global levels. This proactive engagement not only reinforces our sustainability commitments but also serves as a competitive differentiator in the marketplace.

##### Peer benchmarking

We conducted peer benchmarking to evaluate how our material topics align with the priorities of both customers and competitors: analysing sustainability disclosures, ESG strategies and reporting practices of key industry peers and major customers. The benchmarking exercise provided valuable insights into sector-wide expectations, emerging risks and best practices. It also helped us to identify gaps and opportunities in our own ESG approach, ensuring that we align with stakeholder expectations and remain competitive within the packaging industry.

#### 2. Identification of IROs

##### Review of existing work

In 2023, we had undertaken a materiality analysis following the Global Reporting Initiative (GRI) guidelines. Although there is a degree of similarity between the GRI framework and ESRS, the latter's requirements are not entirely encompassed by GRI.

The CRSD requirements prompted us to engage an external consultant to carry out a comprehensive DMA in line with the ESRS requirements, while leveraging insights from our former GRI-based assessment.

##### Topic definitions

As part of our efforts to proactively align with the CSRD and ESRS, we developed Ardagh Group-specific definitions for all ESRS topics, sub-topics, and sub-sub-topics across the ESG pillars outlined in ESRS 1, paragraph AR16. These definitions reflected the specific relevance and materiality of each topic to Ardagh Group's operations, value chain and strategic objectives. To ensure accuracy and alignment with our priorities, we reviewed the drafted topic definitions and validated them through consultation with senior management. This collaborative validation process was critical: resulting topic definitions informed the subsequent phases of our sustainability reporting and DMA, ensuring that our ESG disclosures are meaningful and comply with regulatory expectations.

##### Identified IROs

We developed a comprehensive list of IRO topics for Ardagh Group, encompassing both actual and potential impacts – positive and negative – across environmental, social and governance dimensions. This included impacts directly caused or contributed to by Ardagh Group, as well as those indirectly linked to the company through our upstream and downstream value chain relationships. In addition to impacts, we identified and assessed potential risks that could have a negative financial impact on our business, as well as opportunities with the potential to generate positive financial outcomes. Each IRO was mapped to the specific stages of our value chain where it occurs, providing a clear understanding of its origin and reach. Furthermore, all IROs were evaluated across short-, medium- and long-term time horizons to ensure a forward-looking approach and inform effective sustainability strategy and risk management planning.

##### IRO review

The drafted list of IRO topics was reviewed by members of our senior management team who possess topical expertise and knowledge of Ardagh Group's operations and strategic priorities. Many of these individuals were actively involved in the DMA process, ensuring consistency, accuracy and relevance in identifying and evaluating IROs. Engaging senior management in this review was essential not only to validate the completeness and accuracy of the IROs, but also to ensure that the outcomes of the assessment were aligned with our business context, stakeholder expectations and regulatory obligations. We believe this collaborative engagement fostered cross-functional insights, strengthened internal ownership of sustainability topics and ensured that the final IRO list was robust, balanced and reflected both internal expertise and external sustainability imperatives.

##### Obtaining additional stakeholder insights

To enhance our DMA, we incorporated elements from the previous materiality approach, including direct engagement with key internal functions through stakeholder interviews. These conversations helped surface ESG-related perspectives, concerns, and expectations across the organisation.

We also sought input from a broad range of external stakeholders to ensure a comprehensive understanding of our material IROs. Ongoing engagement, particularly in the communities where we operate, continues to inform our understanding and strengthens the credibility of our assessment.

To reduce potential bias and address knowledge gaps, we foster active collaboration between internal and external stakeholders. In applying our materiality scoring criteria, we exercised professional judgement and used publicly available evidence where direct input was not available.

## ESRS 2: General disclosures continued

### 3. Assessment and determination of IROs

#### 3.1 Scoring methodology

##### *Impact materiality*

For the assessment of impact materiality, each ESRS topic was evaluated based on its calculated severity and likelihood.

Severity was determined using:

- **Scale:** considers the gravity of the negative impact or the benefit of the positive impact on people or the environment
- **Scope:** assesses how widespread the impact is
- **Remediability:** applies to negative impacts only and evaluates the extent to which the impact can be mitigated or reversed

**Likelihood** was assessed by examining how probable the impact is to occur, taking into account historical occurrences, current initiatives and existing preventative measures, all grounded in our risk management practices. Wherever possible, the assessment criteria were aligned with our established risk management framework to ensure consistency, reliability and relevance to our operational context.

##### *Financial materiality*

In line with ESRS standards, we determined the financial materiality of a risk or opportunity by evaluating two factors: the potential magnitude of its financial impact on the business and the likelihood of its occurrence.

**Magnitude** reflects the size of the financial effect.

**Likelihood** considers the probability of the risk or opportunity materialising (applicable to potential impacts only), using parameters consistent with our Enterprise Risk Management (ERM) framework.

Although the ESRS does not prescribe a standard grading scale for assessing financial impact, we adopted a 0–5 point scale that was aligned with Ardagh Group's existing financial risk thresholds used in internal reporting. This approach ensured consistency with our established risk management practices and provided a structured, comparable basis for evaluating financial materiality.

#### 3.2 Define materiality threshold

We established quantitative thresholds for both impact and financial materiality to determine matters that are considered material for reporting purposes. These thresholds were reviewed and validated in collaboration with our senior management team to ensure alignment with our priorities and reporting requirements.

#### 3.3 Assess IROs for materiality

Building on research from our gap assessment – drawing from a wide range of our internal and external documentation – we used a dedicated scoring tool to capture the rationale behind each assessment and to assign preliminary scores across all identified IROs in line with the established methodology. These preliminary results determined materiality from the perspective of impact materiality, financial materiality, or both, depending on how each topic scored against the defined thresholds.

Once preliminary results were available, we engaged with relevant subject matter stakeholders, senior management, and our Finance and Risk teams, to discuss, review and refine findings. Based on the insights and additional evidence, we adjusted the initial scores (where necessary) to ensure accuracy and alignment with our operational realities. Following these revisions, we compiled draft results and presented them to our senior management for final confirmation and approval.

### 4. Validation and reporting

We then engaged workshop participants to validate the preliminary results. For any adjustments, the responsible subject matter expert provided a clear and documented rationale, ensuring transparency and traceability of all changes. The validated results of the DMA were then confirmed through an online workshop with our senior management team, providing an opportunity to review, discuss and challenge the findings. The final validated outcomes established Ardagh Group's material sustainability topics and corresponding reporting obligations under the CSRD.

## Interests and views of stakeholders

### Stakeholder engagement

SBM-2-45(a-d)

At Ardagh Group, we engage a broad spectrum of stakeholders – including customers, suppliers, employees, local communities, investors, industry associations and regulatory bodies – across all regions. The frequency and format of engagement vary depending on the nature of the relationship and the issues involved.

Engagement is conducted through formal mechanisms such as customer sustainability forums, supplier assessments, employee town halls and structured community partnerships. We also participate in cross-sector initiatives like FEVE's Close the Glass Loop in Europe and Ardagh4Education in the US, South Africa, Brazil and Germany.

These interactions aim to align our business with stakeholder expectations, identify risks and opportunities early, co-develop solutions and maintain our social licence to operate. Insights gained inform our target-setting, investment decisions and strategic planning – particularly in areas such as circularity, emissions, diversity and inclusion and local impact.

Stakeholder engagement is embedded in our daily operations. We collaborate with suppliers and customers to innovate and support the green transition, while our employees drive continuous improvement across the network.

We maintain active dialogue with the financial community – primarily institutional investors and analysts – through our Investor Relations function. The perspectives of all stakeholders are vital to shaping our business model and strategic direction.

Both AMP and AGP are directly involved in these efforts. The Board of Directors of Ardagh Group S.A. (Board), as well as the Board Sustainability Committee, are regularly updated on stakeholder insights, particularly in the context of strategy and risk management.

**ESRS 2: General disclosures** continued**Interests and views of stakeholders** continued

SBM-2-45(a), SBM-2-45(b-d)

Stakeholder	Engagement occurs	How it is organised	Purpose	Outcome taken into account
<b>Customers</b>	Regularly	<ul style="list-style-type: none"> <li>Periodic reviews and meetings with customers</li> <li>Customer support queries</li> <li>Day to day interaction</li> </ul>	<ul style="list-style-type: none"> <li>Order fulfilment and customer satisfaction</li> <li>Understanding the demand for green solutions and customer expectations</li> <li>Providing transparency and building trust</li> </ul>	<ul style="list-style-type: none"> <li>Customer feedback is used to improve our product offering</li> <li>Adaptation of marketing strategies e.g. NextGen furnace</li> </ul>
<b>Employees</b>	Regularly	<ul style="list-style-type: none"> <li>Learning and development</li> <li>Employee Engagement surveys</li> <li>BeWell programmes</li> <li>Day to Day interaction</li> </ul>	<ul style="list-style-type: none"> <li>To ensure employee wellbeing, engagement and development</li> <li>Understand employees expectations and challenges</li> </ul>	<ul style="list-style-type: none"> <li>Employee feedback leads to actions to help ensure a happy and engaged workforce</li> <li>Internal policies developed and communicated</li> </ul>
<b>Suppliers</b>	Regularly	<ul style="list-style-type: none"> <li>Interviews and assessments for supplier due diligence</li> <li>Workshops and industry collaborations, e.g. Feve, CMI</li> </ul>	<ul style="list-style-type: none"> <li>Promoting responsible sourcing, including minerals and metals</li> <li>Protecting human and labour rights of workers</li> <li>Ensuring a respectful working environment</li> <li>Decarbonising our value chain and promoting circular solutions for resource use</li> <li>Understanding supplier needs and concerns</li> </ul>	<ul style="list-style-type: none"> <li>Informed procurement decisions</li> <li>Collaboration for low-carbon solutions and sourcing</li> </ul>
<b>Investors and ESG analysts</b>	Regularly	<ul style="list-style-type: none"> <li>Quarterly reporting and earnings calls</li> <li>One to one investor relations meetings</li> </ul>	<ul style="list-style-type: none"> <li>Ensure transparent market communication and dialogue</li> <li>Understanding investor concerns</li> </ul>	<ul style="list-style-type: none"> <li>Investor feedback is part of the corporate decision-making process</li> <li>Initiate action plans to improve ESG performance</li> </ul>
<b>Regulators and consultations</b>	Adherence to regulatory requirements	<ul style="list-style-type: none"> <li>Consultation where required</li> <li>Facility inspections</li> </ul>	<ul style="list-style-type: none"> <li>Ensure up-to-date with compliance requirements</li> </ul>	<ul style="list-style-type: none"> <li>Changes impact business decisions, procedures and reporting</li> </ul>
<b>Industry associations</b>	Regularly	<ul style="list-style-type: none"> <li>Workshops and industry conference and committee representation</li> </ul>	<ul style="list-style-type: none"> <li>Seeking information or collaboration on common industry goals</li> <li>Developing industry standards for sustainability</li> <li>Pooling efforts to decarbonise hard-to-abate sectors in our supply chain</li> </ul>	<ul style="list-style-type: none"> <li>Feedback and information informs business decisions and projects</li> </ul>
<b>ESG rating agencies</b>	Annually	<ul style="list-style-type: none"> <li>Reporting on ESG frameworks</li> </ul>	<ul style="list-style-type: none"> <li>Create transparency and share ESG data</li> </ul>	<ul style="list-style-type: none"> <li>Demand for data and information informs our reporting practices</li> </ul>



# ESRS Environment

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# Our approach

With average global temperatures breaking records again in 2024 and natural resources under pressure on every continent, we take environmental actions across our value chain.

Ardagh Group has a long heritage in manufacturing sustainable metal and glass packaging. We are committed to creating a better future for our people and our planet.

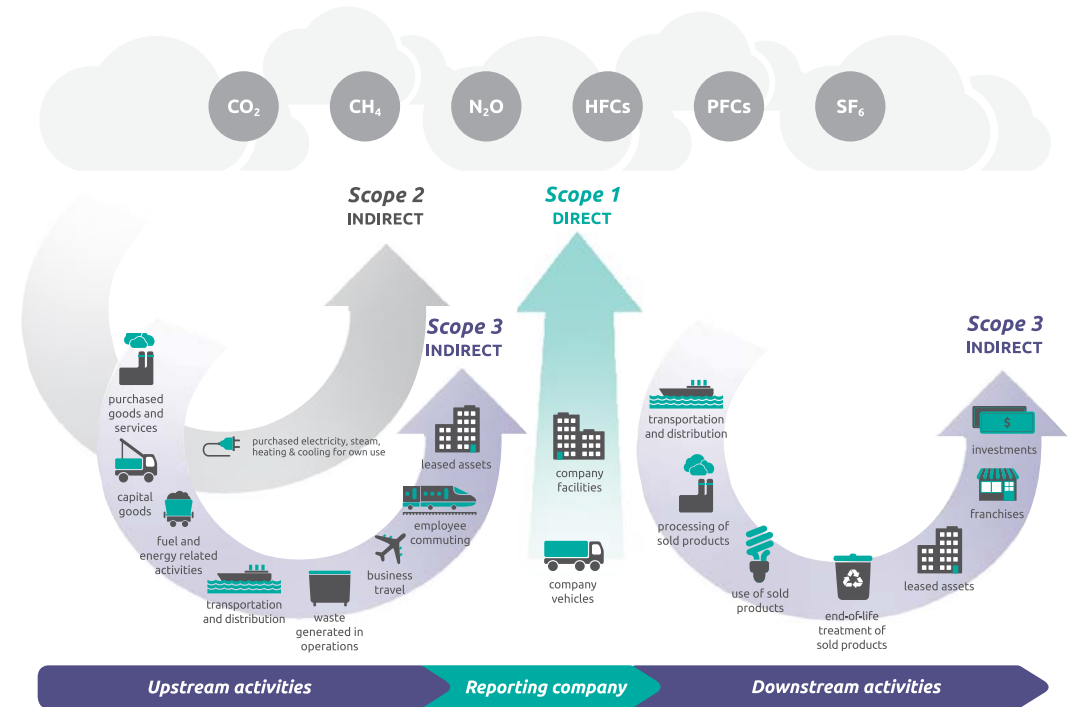
We produce some of the most recyclable packaging products in the world, which can play a key role in a more circular economy, reducing waste and environmental pollution, and limiting emissions. AMP is one of the leading producers of aluminium cans, the world's most recycled beverage packaging, which are made from a durable metal that can be reprocessed with minimal losses. AGP is a leading producer of glass containers, which are made from natural raw materials and recycled glass, and that can be almost endlessly reprocessed without loss of quality.

As a manufacturer with a complex supply chain and present in multiple locations, we work to achieve the best environmental performance where economically feasible. We are committed to identifying, measuring and improving outcomes in all aspects of our value chain - from the energy we procure, to the sources of our raw materials and the ways that our products are collected and recycled.

Our focus is on reducing energy consumption and GHG emissions to their lowest possible levels, while maximising recycling rates and optimising materials' usage. We also place great importance on responsible waste management, avoiding landfill usage and striving to minimise water consumption wherever feasible and economically viable.

We have implemented robust environmental management systems across all our facilities and focus on continual improvement. Our sustainability strategy is to reduce consumption and enhance efficiencies while investing in innovative technologies that minimise emissions. In addition, we collaborate closely with our suppliers to advance low-carbon aluminium technologies, improved access to recycled glass and invest in renewable energy solutions, helping to reduce our Scope 1, 2 and 3 emissions.

## Overview of GHG Protocol scopes and emissions across Ardagh Group's value chain<sup>1</sup>



<sup>1</sup> Copyright: GHG Protocol.org

# ESRS E1: Climate change

At Ardagh Group, we understand that the impact of our actions reaches far beyond the immediate. As a large-scale producer, we carry significant environmental responsibilities, which we approach very seriously. We strive to identify, control and measure the environmental impact of our activities. By doing so, we are constantly working to minimise the footprint of our operations.

Our focus is on reducing energy consumption and emissions while maximising recycling rates and optimising material usage. We also place great importance on responsible waste management, actively avoiding landfill usage and striving to minimise water consumption wherever possible.

We have implemented robust environmental management systems across all our facilities, with the aim of continually improving our practices. Our strategy revolves around reducing consumption and enhancing efficiencies while investing in innovative technologies that minimise emissions. In addition, we collaborate closely with our suppliers to advance lower-carbon technologies and invest in renewable energy solutions, helping to reduce our Scope 1, 2 and 3 emissions.

Our overarching goal is clear – to reduce our environmental impact, while fostering innovation and efficiency throughout all levels of our operations. Our packaging is uniquely placed for decarbonisation, mostly based on levers that are already available today. Its potential for a high percentage of recycled content combined with minimal process losses and the high value of the material itself, make highly circular, lower-emissions products an attractive proposition.

As durable materials, metal and glass are integral to the circular economy and reducing carbon emissions. These materials can be continuously recycled in a closed loop, maintaining their quality with minimal product loss. As long as they are recycled into new products, they remain a valuable resource to reduce reliance on virgin materials and decrease emissions.

We are committed to enabling the circular economy through responsible sourcing and driving demand for higher recycled content, as well as advocating for increasing global recycling rates in partnership with our trade associations.

In several markets, numbers point to a broad increase in recycled content, suggesting that a significant reduction in CO<sub>2</sub> emissions is already happening. To sustain this progress, it is essential for the industry to continue investing in recycling and innovation to enable lower-emissions products but also to drive regulation and activities supporting future increases in consumer recycling rates, as we are moving towards the vision of almost fully circular products. We are an active and engaged industry partner, participating in industry initiatives to enable decarbonisation and recycling across the entire value chain.



## ESRS E1: Climate change continued

### Climate change IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Climate change adaption</b>					
Manufacturing activities require significant energy use, contributing to GHG emissions.	Negative impact		●		Developing a decarbonisation roadmap to ensure our business meets our sustainability targets while continuing to grow.
Risks related to physical changes in climate, such as more extreme weather events, may impact operational efficiency.	Risk	●	●		Using scenario analysis to inform long-term capital investments and operational decisions.
Promoting a circular economy model, including reuse and recycling, can reduce waste and emissions.	Opportunity	●	●	●	Collaborating across the value chain, including strategic engagement with suppliers on lower-carbon materials and customers on recyclable product design.
<b>Climate change mitigation</b>					
Implementing energy-saving measures, efficiency improvements, including waste practices, in the manufacturing process can drastically reduce GHG emissions and contribute to climate change mitigation.	Positive impact		●		Evaluating and testing step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions. We remain committed to long-term investment that supports enduring operational improvements.
Transitioning to lower-carbon technologies and energy sources can reduce carbon footprints and contribute to climate change mitigation.	Opportunity		●		Invest in technologies to enhance operational efficiency and reduce our thermal energy and electricity consumption.
Failure to meet emissions reduction targets or comply with future potential governmental regulations might result in fines or legal action.	Risk	●	●	●	We promote ongoing efficiency enhancements through our Energy and Carbon Management Guidelines, in alignment with the principles of our Responsible Procurement policy.
<b>Energy</b>					
Manufacturing activities within glass, particularly, use large amounts of energy contributing to GHG emissions. This includes energy use in production processes such as glass melting, moulding and annealing which can lead to high costs and environmental impacts.	Negative impact		●		Transitioning our energy mix through increased use of renewable electricity, deployment of hybrid furnace technologies, evaluation of full electrification where feasible, and continued exploration of lower-carbon fuels such as hydrogen and biogas.
Energy use for production processes within metal such as alumina production and smelting contribute to GHG emissions and climate change.	Negative impact	●			Ardagh Group has disclosed in its Responsible Procurement Policy that the suppliers must understand the organisation's environmental footprint and establish a programme for environmental stewardship.
Encouragement of proper disposal and recycling can minimise energy usage.	Positive impact		●	●	Collaborating across the value chain – including industry associations, suppliers and customers – to improve glass and aluminium collection and recycling rates, which supports energy savings and increases recycled content in packaging.
Increasing energy costs could affect the cost of raw materials, operating expenses and overall profitability.	Risk	●	●		We monitor energy price volatility as a cost driver and mitigate exposure through strong procurement practices and supplier partnerships. We also invest in renewable electricity where feasible – including onsite, near-site and direct-connect PPAs – to reduce long-term energy cost risk.



## ESRS E1: Climate change continued



### Our decarbonisation roadmap

E1-1-16(a&i)

In 2022, the Science Based Targets initiative (SBTi) approved our 2030 emissions reduction targets, which are aligned to the Paris Agreement. Through our transition roadmaps, we aim to achieve our 2030 targets. These include a commitment to reducing our Scopes 1 and 2 GHG emissions in line with limiting global warming to 1.5°C. Our harder-to-abate Scope 3 emissions targets support a limiting of global warming to 2.0°C.

In 2024, we published the AMP and AGP structured **decarbonisation roadmaps**. Through these roadmaps, which apply to all our operations in Europe, North America, South America and Africa, we aim to reduce our Scope 1, 2 and 3 emissions.

Ardagh Group's sustainability strategy is focused on three pillars: Emissions, Ecology and Social. We aim to reduce emissions, material use, waste and water consumption while fostering a diverse and inclusive work environment and making a positive impact on the communities in which we operate.

While this strategy remains valid and unchanged, we recognise the reality of advancing climate change and an increasing public and regulatory focus on the topic. With recycled aluminium avoiding over 95% of the emissions of virgin material<sup>1</sup>, increasing the presence of recycled aluminium in our cans is a key environmental priority and business opportunity for AMP. With recycled glass, every 10% increase in cullet use reduces energy consumption by approximately 2.5%<sup>2</sup>, making it a key driver of emissions reduction and operational efficiency in our furnaces. Increasing recycled content is both an environmental goal and a strategic opportunity for AGP.

<sup>1</sup> Source: Aluminium Association, <https://www.aluminum.org/sustainability>

<sup>2</sup> Source: [GT COURSE 1997.PDF](#)

## ESRS E1: Climate change continued

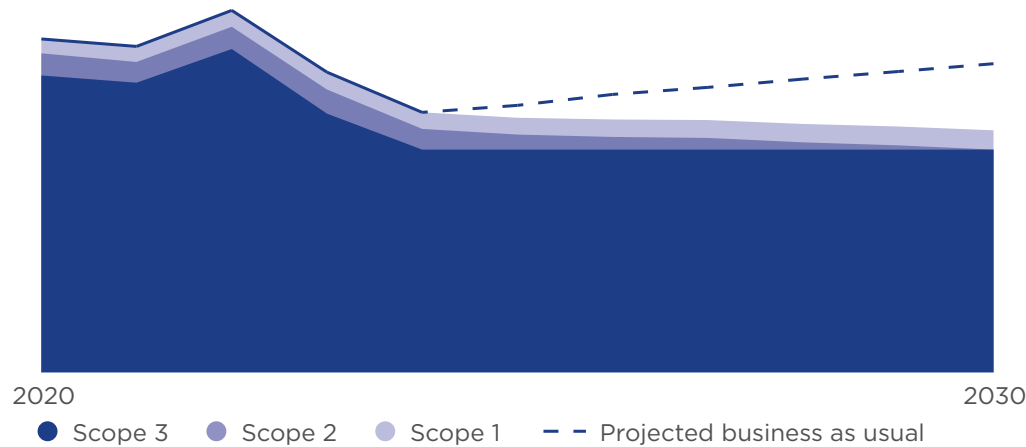
### Decarbonisation levers

E1-1-16(b)

#### AMP

At AMP, we are committed to our sustainability goals and progressing toward our 2030 SBTi-approved targets. Our climate strategies are made up of key levers for decarbonising:

Fig. 2024 AMP Decarbonisation roadmap



\* Baseline figures for emissions are from 2020  
 \*\* Scope 2: 100% renewable electricity by 2030

- **Energy efficiency:** Reducing energy usage and driving efficiencies in all our operations
- **Energy transition:** Transitioning to renewable electricity and alternative low-carbon thermal solutions
- **Sustainable transport:** Investing in low carbon transport
- **Circularity and material use:** Reducing material consumption through product design and increasing recycled content use in aluminium

- **Innovation:** Identifying technologies and promoting further low-carbon aluminium sourcing

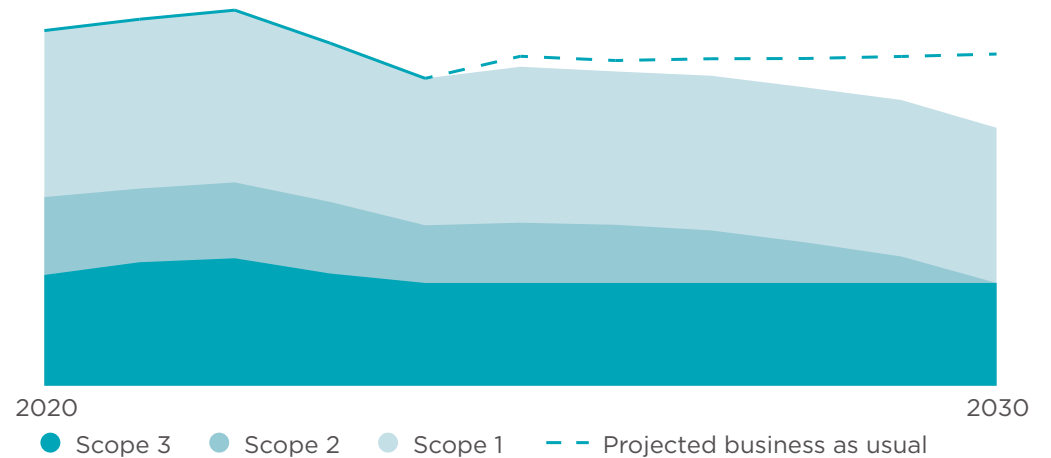
We continue to explore other levers to maximise impact this decade, including selecting technologies for sustained decarbonisation beyond 2030, to achieve net zero.

The images are for illustrative purposes only and may not be an exact representation of our roadmap.

#### AGP

AGP's decarbonisation roadmap is structured around four primary levers:

Fig. 2024 AGP Decarbonisation roadmap



\* Baseline figures for emissions are from 2020  
 \*\* Scope 2: 100% renewable electricity by 2030

- **Energy transition:** Prioritising renewable electricity procurement and exploring future lower-carbon fuel options, including hydrogen and biofuels
- **Circular material use:** Increasing cullet input in our furnaces to reduce emissions associated with raw material extraction, transport and melting
- **Energy efficiency:** Investing in furnace rebuilds, batch optimisation and higher-efficiency plant infrastructure to reduce energy use and improve overall performance

- **Technology & Innovation:** Advancing hybrid furnace technologies, such as our NextGen furnace, and leveraging digital tools for energy monitoring and process optimisation

These levers are informed by internal lifecycle assessments, CDP-aligned methodologies and collaboration with industry bodies such as FEVE (EU), Glass Futures and GPI (USA).

## ESRS E1: Climate change continued

### Investment and funding

E1-1-16(c&e)

#### AMP approach

In 2024, AMP invested US\$2.64 million in technologies to enhance our operational efficiency and reduce our thermal energy and electricity consumption. To support both the reduction of our CO<sub>2</sub>e emissions for Scopes 1 and 2, as well as our VOC emissions' intensity, we invested more than US\$5 million in new technologies in our manufacturing facilities. We have also raised the recycled content across our product portfolio, reducing our overall Scope 3 emissions by a significant margin beyond our 2030 target. To support this progress, we have invested just over US\$2.74 million in innovative solutions. Progress so far indicates that these new techniques will make significant further improvements to the emissions profile of our products.

To help reach our 2030 renewable energy target of 100%, we continue to enhance our electricity procurement strategy. In 2024, we invested -US\$270,000 in securing Power Purchase Agreements, renewable energy contracts and certificates, which contributed to the reduction of our Scope 2 emissions.

We continue to innovate with our customers and suppliers. In 2024, we conducted trials on processes and technologies to further reduce the raw material consumption of our facilities. These included optimisation projects to enhance the performance and quality of aluminium beverage cans.

### AGP approach

We continue to invest in the quantity and quality of recycled content across all regions, a key lever in progressing Scope 3 emissions reductions. In 2024, AGP invested over US\$15 million in technologies to enhance operational efficiency and reduce energy-related emissions. This figure excludes our acquisition of Svensk Glasåtervinning (SGÅ), a glass collection and processing company, and contributions to the money4glass initiative in AGP-Africa. AGP-North America also helped fund the Don't Trash Glass programme in Chicago, Illinois. We dedicated nearly US\$1.5 million to water reduction technologies, including solutions that improve water recirculation across our operations.

We also strengthened our electricity procurement strategy, supporting a 4% increase in renewable electricity use year-over-year and a 6% increase compared to 2020.

AGP further advanced two cornerstone technologies in 2024 – our NextGen Furnace in Obernkirchen, Germany and our hydrogen electrolyser in Limmared, Sweden. Both contributed to emissions reductions during the year and are expected to play an increasingly instrumental role in driving future GHG reductions.

### Assessing potential locked-in emissions

E1-1-16(d)

We recognise that we need to mitigate potential locked-in GHG emissions – those that are inherent to legacy processes and systems. The causes of these locked-in GHG emissions may include the relatively long lifespan of packaging manufacturing facilities, with complex assets that are expensive and hard to replace. To address these challenges, we are:

- Investing in energy-efficient practice to reduce energy consumption
- Sourcing more renewable energy
- Reducing raw material consumption
- Advocating for higher recycling rates through partnering with our trade associations

#### AMP approach

Locked-in emissions can arise at AMP due to using aluminium as a primary raw material, which involves energy-intensive production. We are addressing this issue through the above actions as well as:

- Working in partnership with our suppliers to procure more can sheet with a higher recycled content
- Supporting industry initiatives to reduce energy-intensive virgin aluminium production, which accounts for the overwhelming majority of GHG emissions of our products<sup>1</sup>

### AGP approach

AGP operates long-life assets such as container glass furnaces with operational lifespans that can exceed 15 years. These assets contribute to locked-in emissions, which we are addressing through:

- Incorporating lower-carbon technologies during rebuild cycles
- Aligning renewable energy procurement with furnace rebuild timelines
- Conducting scenario modelling to explore asset-level emissions trajectories and risks (see E1-4)

These actions are designed to reduce future emissions liabilities while safeguarding business continuity.

### Strategic alignment and Board approval

E1-1-16(h-i)

Governance of the Ardagh Group's climate strategies, including its decarbonisation roadmap, is overseen by the Board's Sustainability Committee. Function leaders in Sustainability, Operations and Finance have assigned management roles, with formal accountability processes on performance. The decarbonisation roadmaps are formally approved at the Ardagh Group's sustainability committee level and embedded into operational accountability structures. The Sustainability Committee monitors progress against the Ardagh Group's current decarbonisation roadmap. In addition, the Sustainability Committee is responsible for reviewing, and recommending to the Board for approval, any changes to the targets set out in Ardagh Group's decarbonisation roadmap.

<sup>1</sup> Source: [International Aluminium Institute: Aluminium Sector Greenhouse Gas Emissions – International](#)

## ESRS E1: Climate change continued

### Decarbonisation roadmap progress

E1-1-16(j)

#### AMP approach

Significant business growth during 2024 led to an increase in absolute Scope 1 and 2 emissions of 2% from the 2020 baseline. To address this, we have initiated the following:

- Established Scope 1 efficiency projects, upgrading to equipment with higher efficiency and optimising settings including introducing waste heat recovery (see emissions reductions table on page 34)
- Entered into new renewable electricity purchase power agreements (PPAs) with the following partners:
  - Sunnic Lighthouse GmbH in Germany: The PPA will also secure a solar energy supply allocation to AMP facilities in Germany, which makes this the first of its kind to supply renewable energy to both AMP and AGP
  - BNZ in Portugal: commencing in 2026 for 12 years to secure 146 GWh annually of renewable electricity certificates, offsetting approximately 50% of AMP's mainland European energy consumption
- Established innovation programmes with significant investment of US\$1.8 million, working in partnership with our suppliers and customers to reduce our material consumption and enable increased recycled content product design to support our Scope 3 emissions reductions plan.

#### AGP approach

From 2020 to 2023, AGP's Scope 1 and 2 emissions fluctuated, reflecting operational variability across regions, while overall emissions declined by 5%. In 2024, emissions were 15% lower than in 2020, primarily due to footprint optimisation in North America. In parallel, AGP continued laying the groundwork for future emissions reductions through early-stage implementation of renewable electricity projects and lower-carbon technologies, such as the NextGen Furnace and hydrogen electrolyser.

Current and future contributors to further reducing Scope 1 and 2 emissions include:

- Lower-carbon technologies
  - Our NextGen Furnace in Obernkirchen, Germany
  - Our hydrogen electrolyser in Limmared, Sweden
- 🔗 **For more detail, see NextGen Furnace and Hydrogen Electrolyser (pg. 36)**
- Renewable electricity procurement
  - A solar installation in Madera, California, expected to supply ~20% of annual electricity needs after commissioning in 2025
  - A virtual power purchase agreement (vPPA) with Rezolv Energy in Bulgaria, commencing April 2026 and covering 146 GWh annually
  - A vPPA with Sunnic Lighthouse GmbH in Germany, securing long-term solar energy supply for AGP-Europe's NextGen Furnace

- Recycled glass investments
  - AGP-North America's partnership with CAP to increase recycled glass use
  - AGP-Europe's acquisition of SGÅ, a leading glass collection and processing company
  - AGP-Africa's money4glass initiative to improve glass collection and circularity

### Policies addressing climate change mitigation and adaptation

E1-2-24(a-b)

Ardagh Group's Enterprise Risk Management (ERM) Policy and Framework includes systems and processes for identifying, monitoring and mitigating business, operational and legal risks, including those climate related:

- **Responsible Procurement Policy:** Sets out the expectation that all suppliers are engaged in GHG emission reduction efforts. We expect suppliers to identify and implement energy saving initiatives where applicable
- **Environmental Policy:** Supports the Ardagh Group's sustainability strategy and the achievement of our sustainability and climate change targets, and is referenced in our Code of Conduct (Code)

### Policies addressing energy efficiency

E1-2-25(c)

**Responsible Procurement Policy:** Sets out the expectation of suppliers to continually identify and implement energy saving initiatives where applicable. The Policy also encourages suppliers to contact us if they have any suggestions for collaborative projects.

### Policies addressing renewable energy deployment

E1-2-25(d)

**Responsible Procurement Policy:** Sets out the expectation of our suppliers to move away from non-renewable energy sources when feasible and economically viable. In the interim, expectations have been set of suppliers to identify and implement energy saving initiatives where applicable.





## ESRS E1: Climate change continued

### Actions and resources related to climate change policies

E1-3-28

At Ardagh Group, we are tackling our emissions by taking a holistic approach to our operations and across our supply chain. We seek to drive efficiencies and to deliver through innovative solutions in manufacturing. We procure renewable energy when feasible and economically viable, and we work in close collaboration with our industry associations, including Can Manufacturers Institute (CMI) and Glass Packaging Institute (GPI) in North America, Metal Packaging Europe (MPE) and FEVE in Europe, and Abralatas in Brazil, to increase recycled content and to reduce the direct and indirect emissions of our materials.

We have set ambitious goals to deliver on our 2030 SBTi targets through these levers:

- Implementing significant impact Scope 1 and 2 efficiency projects (for more details, see pg. 39)
  - Despite growing year on year, AMP has demonstrated that we have made the right strategic investments to continue to reduce our Scope 1 and 2 GHG emissions by 12% in 2024, compared to 2023, per 1,000 units of finished goods.
  - AGP's 15% reduction in Scope 1 and 2 emissions (2024 vs. 2020) reflects a combination of early-stage progress towards our 100% renewable electricity commitment, initial impacts from new technology investments such as the NextGen Furnace and hydrogen electrolyser and the effects of footprint optimisation.

- Trialling step-change projects to roll out across our facilities and reduce our Scope 1 and 2 emissions
  - We continue to invest to make long-term change within our operations. During 2024, AMP and AGP invested US\$7.74 million and -US\$17million, respectively, on sustainability projects across our global footprint.
- Focusing on delivering our ambition to use 100% renewable electricity by 2030
  - Our power purchase strategy continues to support progress across our global operations. In 2024, AMP increased renewable electricity coverage by 10% compared to 2023, while AGP achieved a 4% year-over-year increase. We also signed several new vPPAs in mainland Europe to further expand renewable electricity access. We are also increasing our on-site and near-site renewable installations (e.g., solar PV at production facilities), physical PPAs (country-specific, sleeved into utility contracts) and use of unbundled certificates as a top-up.
- Targeting a reduction in our volatile organic compound (VOC) intensity of 10% by 2030
  - In AMP, we have continued to invest in technologies to neutralise VOCs and improve our energy efficiency. In 2024, we spent over US\$2.37 million, achieving 89% of this target. This included a pivotal shift in our operations to increase aluminium can production. On 31 December 2023, we ceased steel production in Weißenthurm, initiating a new aluminium production line at the same location during 2024. These changes resulted in substantial environmental benefits, with a 50 tonnes reduction in VOC emissions, (equivalent to 51%) at the facility in 2024 versus 2023.

- Working in partnership with our aluminium and cullet suppliers to redesign our products to enable a higher recycled content

- Within AMP during 2024, the recycled content of our aluminium beverage cans, at a global average of 78%, continued to be leading based on public disclosures of industry peers we reviewed. During 2024, we invested US\$2.74 million in innovation projects.
- In 2024, AGP invested across all regions to improve both the quality and quantity of recycled glass entering our supply chain. These efforts included support for the Don't Trash Glass initiative in AGP-North America, the acquisition of SGÅ in AGP-Europe, and the continued rollout of the money4glass initiative in South Africa (AGP-Africa).

**For more detail, see money4glass initiative (pg. 73)**

Both aluminium beverage cans and glass containers are uniquely positioned to support decarbonisation, leveraging technologies and systems already available today as well as developing new technologies. Aluminium cans combine a high percentage of recycled content, minimal process losses and high intrinsic material value – making them well suited for informal and commercial collection systems. Similarly, glass containers are recyclable without loss of quality, enabling closed-loop recycling when supported by strong collection and processing infrastructure.

Both packaging formats are highly circular and have the potential to support decarbonisation – offering valuable pathways toward a more sustainable economy. In several markets, including Europe, Metal Packaging Europe (MPE) have reported increased recovery and recycling of metal from beverage cans, signalling real reductions in CO<sub>2</sub> emissions.

At the same time, investments in glass collection and processing, including AGP's actions in Europe and Africa, are improving both the quantity and quality of recycled glass entering the supply chain.

To sustain and scale these gains, it is essential for industries to continue investing in recycling infrastructure, collection systems and material innovation. These efforts will enable lower-emission packaging and help shape regulations that further increase consumer recycling rates.

As our sectors move toward a more circular future, we remain active and engaged industry partners – collaborating across the packaging value chain to drive decarbonisation, circularity and shared progress.

**For more detail, see E5 (pg. 63)**

## ESRS E1: Climate change continued

### Actions to support our climate objectives

E1-3-29(a)

#### AMP

As well as industrial initiatives, we also leverage our scale and network to support ecosystems to mitigate CO<sub>2</sub>e emissions. During 2024, these included:

#### Sustaining progress on zero waste to landfill

We continue to improve waste reduction across our facilities, reducing potential GHG emissions including methane and nitrous oxide. In 2024, this included ongoing improvements to our performance in our plants, enhancing performance on waste recycling and recovery. These initiatives have contributed to a rise from 75% to 83% zero waste to landfill in 2024 and keeping us on track to meet our 2025 100% target.

#### Supporting consumer recycling and awareness

We are a funding partner for Every Can Counts, an international organisation that creates can-collecting interventions in public venues such as sports stadia and music festivals. These interventions raise the profile of aluminium's recyclability and build support for initiatives such as Deposit Return Schemes and funding for recycling infrastructure. ECC expanded in 2024, with representation in both UAE and the US.

### Reducing the water intensity of our industrial processes

During 2024, we continued our ongoing programme to improve the efficiency and ability to treat and recycle water used in our plants. This included implementing new monitoring technology at our can body plant in Valdemorillo, Spain. Real time data and flow control resulted in 30% water savings from our baseline 2020 levels (see spotlight story). With water resources under increasing pressure from industry, human development, and climate change, we are on track to achieve our 20% water reduction 2030 target, reducing water intensity by 6%.

[🔗 For more detail, see \(pg. 5 and 56\)](#)

### AGP

In 2024, AGP implemented several high-impact actions to support progress towards its climate targets.

#### NextGen Furnace and renewable electricity PPA – Obernkirchen, Germany

AGP-Europe entered into a long-term renewable electricity Power Purchase Agreement (PPA) with Sunnic Lighthouse GmbH and ENERPARC AG. This PPA secures the supply of approximately 130 GWh of solar electricity annually, with a portion supporting AGP-Europe's NextGen Furnace in Obernkirchen, a key enabler of lower-carbon glass manufacturing.

The NextGen Furnace's aim was to transition from a traditional 90% gas and 10% electricity model to one powered by 80% renewable electricity and 20% gas. This switch is expected to deliver a 69% reduction in emissions per bottle produced, contributing to substantial annual CO<sub>2</sub> savings of up to 45,000 tonnes across Scope 1, 2, and 3.

#### Green hydrogen integration – Limmared, Sweden

At its facility in Limmared, AGP-Europe commissioned a 5MW Proton Exchange Membrane (PEM) electrolyser to produce green hydrogen on-site using renewable electricity. In its first two months of operation, the furnace successfully combusted over 109,000m<sup>3</sup> of hydrogen, avoiding approximately 70 tonnes of CO<sub>2</sub>.

This project targets a 20% natural gas substitution with hydrogen, marking a breakthrough in sustainable melting technologies. It builds on AGP's progress at the NextGen Furnace and advances AGP's decarbonisation roadmap through hybrid energy sourcing and innovative combustion solutions.

#### Circularity and glass recycling expansion – South Africa

In 2024, AGP-Africa marked the one-year anniversary of its money4glass digital glass recycling initiative. The programme, launched in response to South Africa's Extended Producer Responsibility (EPR) legislation, supports formal and informal recyclers across three tiers, empowering participants through real-time payments and data transparency.

Over the course of 2024:

- 43% of the cullet received at the Gauteng facility and 30% at the Bellville facility were transacted through the digital platform.
- Waste collected via the programme increased from 42 tonnes to 5,000 tonnes.
  - More than R750,000 (€37,000) was paid directly to over 276 registered waste pickers. The programme strengthens circularity, reduces demand for virgin raw materials, and contributes to reducing emissions, while delivering economic inclusion and social impact.

[🔗 For more information on our SBTi 2030 targets, please refer to our decarbonisation roadmap](#)

## ESRS E1: Climate change continued

### Investing in lower-carbon transport AMP approach

During 2024, we continued to work with our logistics partners to reduce transport emissions and reduce costs. Initiatives included the expansion of our relationship with logistics partner Cargo Service Europe. Their large lithium-ion battery trucks are paired to transport large volumes of aluminium can bodies from our Oss, Netherlands plant to CSE's logistics distribution warehouse in Weert. This process delivers 25%-30% in efficiency savings – or a total of -280 tonnes of CO<sub>2</sub>e avoided per year. We partner with hauliers that have low carbon transport models that we are looking to expand. We will continue to assess our logistics provision to increase efficiency and carbon savings.

### AGP approach

In 2024, AGP-Africa piloted a Smart Truck solution in partnership with DP World, trialling advanced Performance-Based Standards vehicles to improve logistics efficiency and sustainability. Following the successful trial, AGP-Africa is investing in full implementation in 2025, introducing five Smart Trucks equipped with dual-fuel engines, enhanced safety systems and the capacity to carry 28 more pallets than conventional trucks. These vehicles are expected to reduce carbon emissions per pallet by 37%, cut road wear by 50% per tonne of payload, and eliminate 1.7 million kilometres of travel over six years – supporting AGP's long-term decarbonisation ambitions while enhancing our operational performance and safety.

### Targets related to climate change mitigation and adaptation

E1-4-30, E1-4-32, E1-4-33, E1-4-34(a-c)

We are focused on meeting our stated objectives across our three sustainability strategy pillars of Emissions, Ecology and Social. We recognise the challenge to achieve net-zero emissions by 2050. So far, we have set ambitious targets for 2030 based on our baseline year of 2020, approved by our Sustainability Committee. The SBTi has validated and approved our near-term GHG emission reduction targets. All data collected and tracked against our targets is third-party verified.

#### SBTi-approved targets\* to be achieved by 2030:

- \*Scope 1 and 2 reductions of 42%, against a 2020 baseline
- \*Scope 3 reduction of 12.3%, against a 2020 baseline

#### 2030 targets to support our GHG reduction pathway:

- Renewable energy of 100%
- VOC intensity reduction of 10% (AMP only)

In addition, we have committed to reducing resource consumption and limiting our waste generation to support our Ecology pillar.

- Water intensity reduction of 20% (AMP) and 26% (AGP)
- Zero waste to landfill by 2025 (AMP) and 2030 (AGP)

We track our progress against our targets and publicly report this information annually. We also conduct Sustainability Committee meetings with members of executive management and members of the Board at least quarterly. In these sessions, we consider key sustainability topics, ensuring pragmatic decision making and sustained and measurable improvements in progress against targets.



\* Baseline figures for emissions are from 2020.

## ESRS E1: Climate change continued

### AMP

#### Our 2024 progress against targets

- **Renewable electricity:** By investing in Power Purchase Agreements, we secured more renewable electricity, increasing the total by 10% in 2024 from 2023 levels to 30% overall. This included a new 46% total for Europe, up from 35% in 2023 and 43% for South America.
- **Scope 1 and 2 reduction vs 2023:** Despite the significant 3% year-on-year (YoY) growth of the business our combined absolute Scopes 1 and 2 fell 10% from 2023 levels:
  - Scope 1 YoY reduction of 5% since 2023
  - Scope 2 YoY reduction of 14% since 2023
- **Intensity down:** Overall, the business has grown 17% since the 2020 baseline. By the end of 2024, Scopes 1 and 2 had only risen to 2% above 2020 levels.
- **Scope 3:** Our total Scope 3 emissions for 2024 also reduced compared to 2023 and we have exceeded our 2030 target significantly. Our decarbonising focus on reducing material consumption, with innovation in manufacturing and improved recycled content levels also contributed positively.
- **Recycled content:** The proportion of recycled content in our cans is one of the highest in the industry, based on public disclosures from peers we have reviewed at 78% in 2024 versus 64% in 2020. To enable more transparent and improved accounting of data, we have been working closely with our trade associations. Together, we have developed a standard recycled content methodology (BCRC methodology). We believe this will benefit all beverage can aluminium sheet providers.
- **VOC intensity:** On track with a 9% reduction in 2024 compared to our baseline year of 2020. Led by our Operations teams, technology and process improvements delivered these reductions.

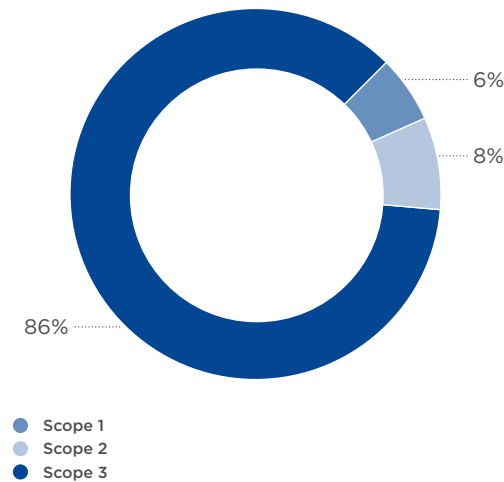
#### Composition of our emissions

- Scope 1 represents 44% of AMP's total annual absolute Scope 1 and 2 emissions
- Scope 2\* accounts for 56% of AMP's total annual absolute Scope 1 and 2 emissions

Note: Scope 1 and Scope 2 make up 6% and 8% respectively of our total GHG emissions inventory. Scope 3 makes up 86% of our total absolute GHG emissions inventory. See pie chart fig. below:

\*Scope 2 calculation is market-based

Fig. GHG Emissions 2024



### AGP

#### Our 2024 progress against targets

- **Renewable electricity:** Through continued investment in Power Purchase Agreements (PPAs), AGP increased its renewable electricity coverage by 4 percentage points in 2024, reaching approximately 20% across the business. AGP-Europe achieved a new high of approximately 48% renewable electricity coverage, reflecting strong regional progress.
- **Scope 1 and 2 reduction vs 2023:** Driven in part by a reduction in packed tonnes, our combined absolute Scope 1 and 2 emissions decreased by approximately 10% compared to 2023 levels.
  - Scope 1 YoY reduction of 9% since 2023
  - Scope 2 YoY reduction of 18% since 2023
- **Carbon intensity:** In addition to reductions in absolute GHG emissions, AGP's corporate carbon intensity - measured as total Scope 1, 2, and 3 emissions per tonne packed - decreased by 7% year over year and by 3% compared to 2020.
- **Scope 3:** Similarly driven in part by a reduction in packed tonnes, our total Scope 3 emissions for 2024 reduced compared to 2023.
- **Recycled content:** The total recycled content of our glass containers - comprising both internal and external cullet - has remained stable since 2020, increasing by approximately 2 percentage points to reach 56% in 2024.

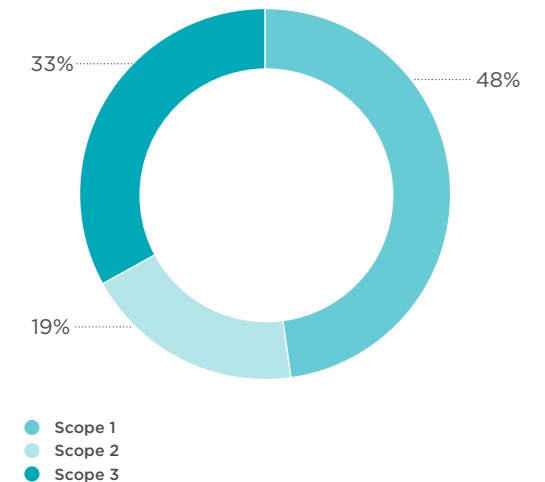
#### Composition of our emissions

- Scope 1 represents 71% of AGP's total annual absolute Scope 1 and 2 emissions
- Scope 2\* accounts for 29% of AGP's total annual absolute Scope 1 and 2 emissions

Note Scope 1 and Scope 2 make up 48% and 19% respectively of our total GHG emissions inventory. Scope 3 makes up 33% of our total absolute GHG emissions inventory. See pie chart fig. below:

\*Scope 2 calculation is market-based

Fig. GHG Emissions 2024





## ESRS E1: Climate change continued

### Target values for 2030

E1-4-34(d)

#### AMP

If we meet our SBTi approved targets (potential minimum financial impact), AMP's total Scope 1 and 2 emissions in 2030 would fall to:

- Scope 1: 183,704 t
- Scope 2: 0 tCO<sub>2</sub>e
- **Total: 183,704 t**

This represents a total reduction of 170,546 tCO<sub>2</sub>e from 2024 levels.

#### AGP

For AGP to meet our SBTi-approved targets, we will need to reduce Scope 1 and 2 emissions to the following levels by 2030:

- Scope 1: 2,358,120 tCO<sub>2</sub>e
- Scope 2: 0 tCO<sub>2</sub>e
- **Total: 2,358,120 tCO<sub>2</sub>e**

Achieving this goal will require strategic action and collaboration to drive an additional reduction of 1,057,406 tCO<sub>2</sub>e from 2024 levels.

### Refining our emissions targets

E1-4-34(e)

In 2022, the SBTi approved our 2030 GHG emissions targets and their alignment with the Paris Agreement. The SBTi Targets received external assurance and the metrics for our Emissions and Ecology sustainability strategy pillars also receive annual third-party assurance<sup>2</sup>.

Future developments such as changes in sales volumes, shifts in customer preferences and demand, regulatory factors and new technologies are difficult to model. Some or all of these could potentially impact both our GHG emissions and emissions' reductions. That said, at Ardagh Group we believe that our strategy to focus on our decarbonising levers will continue to make the right level of impact.

We recognise the ambition of the Paris agreement to achieve net zero emissions by 2050 and to formulate realistic medium and long-term science-based targets for the years beyond 2030. We are working on a decarbonisation plan that will track the intervals aligned to SBTi<sup>1</sup> recommendations and best practice.

We plan to continue to improve operational efficiencies and enhance our power procurement strategy, as well as investing pragmatically in lower-carbon technologies. We aim to increase recycled content in our products, partnering with our suppliers to use lower-carbon aluminium (AMP) and to collect and process quality, recycled glass cullet (AGP).

We are supporting our work by advocating circularity through our trade association partnerships. For AMP, we believe this will continue to reduce our own material and energy consumption, as well as helping the wider industry to achieve a lowest-carbon beverage can as standard. For AGP, we believe this approach will continue to reduce the carbon intensity of our glass packaging, strengthen supply chain resilience, and contribute to a more circular glass system – supporting industry-wide efforts to make low-carbon, almost endlessly recyclable glass the standard.

1. Source: SBTi suggests targets for 2035, 2040, 2045 and 2050.  
2. The Research Institutes of Sweden (RISE) provided limited assurance of the acquisition, processing and aggregation of the quantitative data necessary.

### Decarbonisation levers

E1-4-34(f)

#### AMP

Our emissions profile is as follows:

- Scope 1 makes up 6% of our total GHG emissions inventory
- Scope 2 make up 8% of our total GHG emissions inventory
- Scope 3 makes up 86% of our total absolute GHG emissions inventory

Our decarbonisation roadmap employs the following levers:

- Reducing energy usage and driving efficiencies in all our operations
- Investing in low-carbon transport
- Developing alternative low-carbon thermal solutions
- Transitioning to renewable electricity
- Increasing recycled content in aluminium
- Lightweighting and downgauging to reduce material consumption
- Identifying technologies and promoting further low-carbon aluminium sourcing

#### Transitioning to renewable electricity

Our ambition is to convert to 100% renewable electricity by 2030, eliminating 8% of our total emissions from electricity consumption – Scope 2 (see chart on pg 32).

#### Increasing recycled content, lightweighting and downgauging

Aluminium, our key raw material, accounts for 91% of our Scope 3 emissions. Our procurement strategy seeks to increase the proportion of recycled content in our products, which avoids 95% of the energy and emissions associated with virgin metal.

In 2024, we achieved a global average of 78% recycled content in our beverage cans. Our procurement strategy seeks to increase further the proportion of recycled content in our products, enabling business growth and the achievement of our reduction targets.

We also work with partners to innovate with raw materials to optimise our product design within our manufacturing facilities. This enables further reductions in the quantities of metal required in each unit, avoiding more emissions.

#### AGP

Our emissions profile is as follows:

- Scope 1 makes up 48% of our total GHG emissions inventory
- Scope 2 makes up 19% of our total GHG emissions inventory
- Scope 3 makes up 33% of our total absolute GHG emissions inventory

Our decarbonisation roadmap is built on the following key levers:

- Improving energy efficiency across all operations
- Exploring and adopting alternative fuels – such as hydrogen and biofuels – where technically and commercially viable
- Advancing electrification through the deployment of technologies like our NextGen furnace – where technically and commercially viable
- Transitioning to 100% renewable electricity
- Increasing both the quality and quantity of recycled glass cullet in our production process

## ESRS E1: Climate change continued

### Scenario modelling and planning assumptions

We at AGP have developed our targets using emissions data aligned with the GHG Protocol and internal scenario modelling that consider:

- Regional energy transition pathways
- Recycled content availability
- Furnace rebuild cycles and investment timing
- Business growth projections through 2030 and beyond

We have modelled future emissions under business growth assumptions, including scope-specific GHG trajectories. These projections assume regional production volumes shifts over time while maintaining an absolute reduction path, in line with SBTi expectations for decoupling growth and emissions. Although these projections inform internal planning and directionally support net-zero alignment, we have not yet submitted formal 2050 targets to SBTi.

### Transitioning to renewable electricity

Our ambition is to convert to 100% renewable electricity by 2030, eliminating 20% of our total emissions from electricity consumption – Scope 2 (see chart on pg. 32).

### Increasing recycled content, light- and right-weighting

Cullet – a key raw material – is a central focus for both our customers and our decarbonisation strategy, supporting emissions reductions across all three GHG Scopes. By increasing the proportion of recycled content in our products, we reduce reliance on virgin raw materials, lower furnace energy demand, decrease process emissions and can also achieve reductions in logistics-related impacts.

We collaborate closely with our customers to innovate in glass container design, balancing performance, aesthetics and sustainability. While lightweighting can reduce carbon intensity and improve logistics efficiency, we prioritise a right-weighting approach – ensuring containers meet functional and brand requirements without compromising quality or manufacturability. By aligning design with production efficiency, we can improve the carbon footprint of finished containers.



## ESRS E1: Climate change continued

### Energy consumption and mix

E1-5-37, E1-5-38, E1-5-39, E1-5-40

	Unit	AMP		AGP		Ardagh Group	
		2023	2024	2023	2024	2023	2024
<b>Energy consumption</b>							
<b>Fossil energy consumption</b>							
Share of fossil sources in total energy consumption	%	89%	84%	96%	95%	96%	94%
Fuel consumption from crude oil and petroleum products	MWh	6,798	4,012	835,374	640,038	842,172	644,050
Fuel consumption from natural gas (incl. LNG)	MWh	809,068	775,441	9,140,870	8,730,893	9,949,938	9,506,334
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources <sup>1</sup>	MWh	738,040	636,152	2,243,441	1,982,132	2,981,481	2,618,284
<b>Renewable energy consumption</b>							
Share of renewable sources in total energy consumption	%	11%	16%	4%	5%	4%	6%
Fuel consumption from renewable sources	MWh	-	-	-	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources <sup>2</sup>	MWh	185,730	269,874	441,975	541,189	627,705	811,063
Consumption of self-generated non-fuel energy	MWh	40	1,762	19,335	17,186	19,375	18,948
Share of renewable sources in electricity consumption	%	20%	30%	17%	22%	18%	24%
<b>Total energy consumption</b>	MWh	1,739,675	1,687,241	12,680,995	11,911,538	14,420,670	13,598,679

<sup>1</sup> Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources is a mix of all sources.

<sup>2</sup> Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources includes fully renewable facilities only.

	Unit	AMP		AGP		Ardagh Group	
		2023	2024	2023	2024	2023	2024
<b>Energy intensity</b>							
Total energy consumption from activities in high climate impact sectors per net revenue from activities high climate impact sectors	MWh/mioUS\$	362	344	2,763	2,815	1,534	1,488
Total energy consumption from activities in high climate impact sectors per tonnes packed from activities high climate impact sectors	MWh/metric tonnes packed goods	-	-	2.2	2.1	-	-
Total energy consumption from activities in high climate impact sectors per 1,000 units of finished goods (pieces <sup>1</sup> ) from activities high climate impact sectors	KWH/1,000 pcs	37	35	-	-	-	-

<sup>1</sup> Includes data only for can body plants (4 can end plants + 1 hybrid plant excluded). Huron plant (hybrid) data omitted because of combined reporting for cans and ends (will be included in 2026 when separated 2025 data for cans and ends is available).

## ESRS E1: Climate change continued

### Gross Scope 1, 2, 3 and total GHG emissions

E1-6-44, E1-6-48, E1-6-49, E1-6-50, E1-6-51, E1-6-53

Breakdown of GHG emissions	Unit	AMP		AGP		Ardagh Group	
		2023	2024	2023	2024	2023	2024
<b>Scope 1 GHG emissions</b>							
Gross Scope 1 GHG emissions	mtCO <sub>2</sub> e	165,020	157,506	2,671,204	2,434,693	2,836,224	2,592,199
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	-	-	45%	47%	42%	44%
<b>Scope 2 GHG emissions</b>							
Gross location-based Scope 2 GHG emissions	mtCO <sub>2</sub> e	289,309	254,275	1,235,183	1,051,857	1,524,492	1,306,132
Gross market-based Scope 2 GHG emissions	mtCO <sub>2</sub> e	229,138	196,744	1,191,355	980,832	1,420,492	1,177,576
<b>Scope 3 GHG emissions</b>							
Total Gross (indirect) Scope 3 GHG emissions	mtCO <sub>2</sub> e	2,474,926	2,132,911	1,868,993	1,709,703	4,343,919	3,842,614
1. Purchased goods and services	mtCO <sub>2</sub> e	2,195,701	1,931,416	795,100	714,935	2,990,801	2,646,351
2. Fuel and energy related activities	mtCO <sub>2</sub> e	73,684	93,202	643,340	582,559	717,024	675,761
3. Upstream transportation and distribution	mtCO <sub>2</sub> e	198,001	97,839	406,077	391,009	604,078	488,848
4. Waste generated in operations	mtCO <sub>2</sub> e	7,540	10,455	24,476	21,200	32,016	31,655
<b>Total GHG emissions</b>							
Total GHG emissions derived from location-based method	mtCO <sub>2</sub> e	2,929,255	2,544,692	5,775,380	5,196,254	8,704,635	7,740,945
Total GHG emissions derived from market-based method	mtCO <sub>2</sub> e	2,869,084	2,487,161	5,731,552	5,125,228	8,600,635	7,612,389



## ESRS E1: Climate change continued

### AMP

Fig. AMP Scope 1 and 2 decarbonisation progress

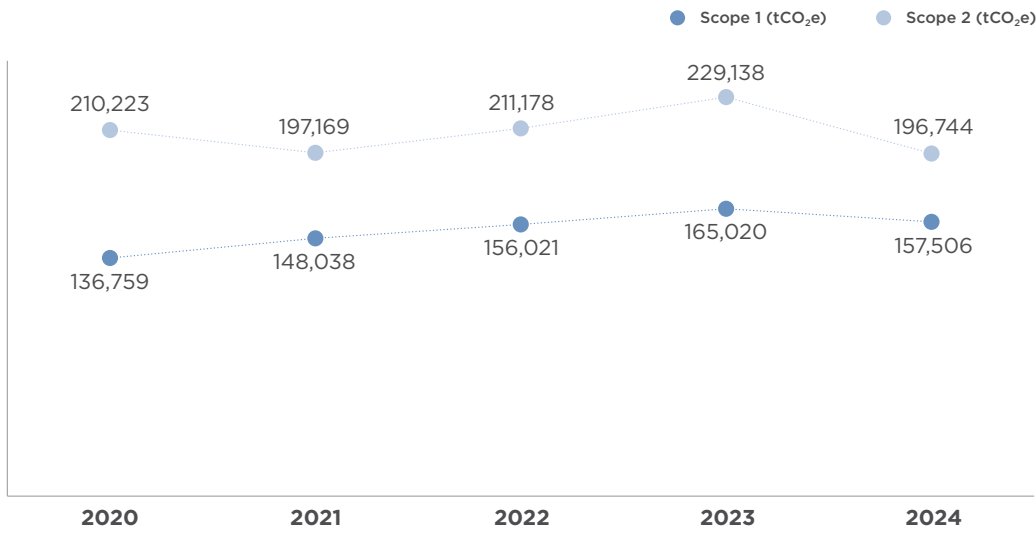
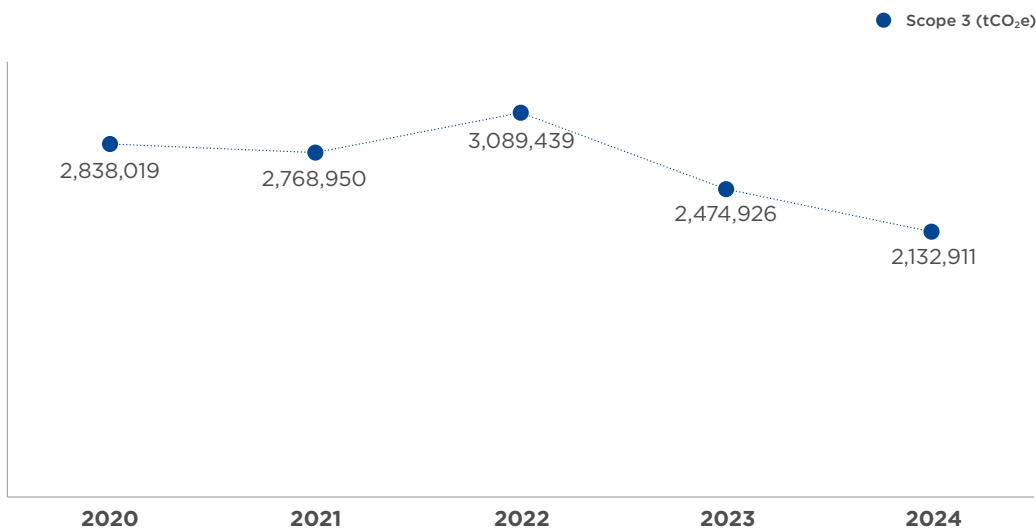


Fig. AMP Scope 3 decarbonisation progress



### AGP

Fig. AGP Scope 1 and 2 decarbonisation progress

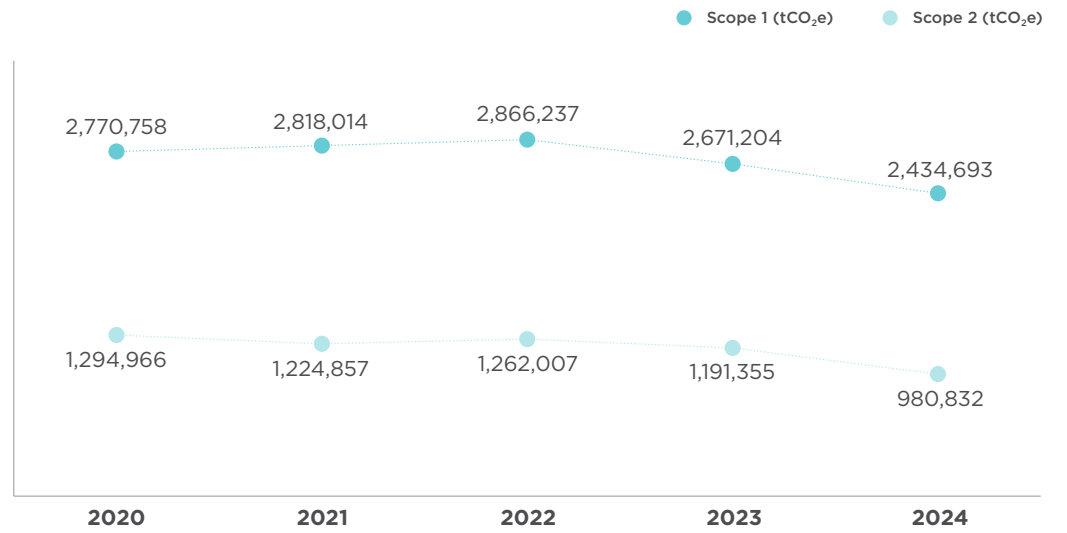
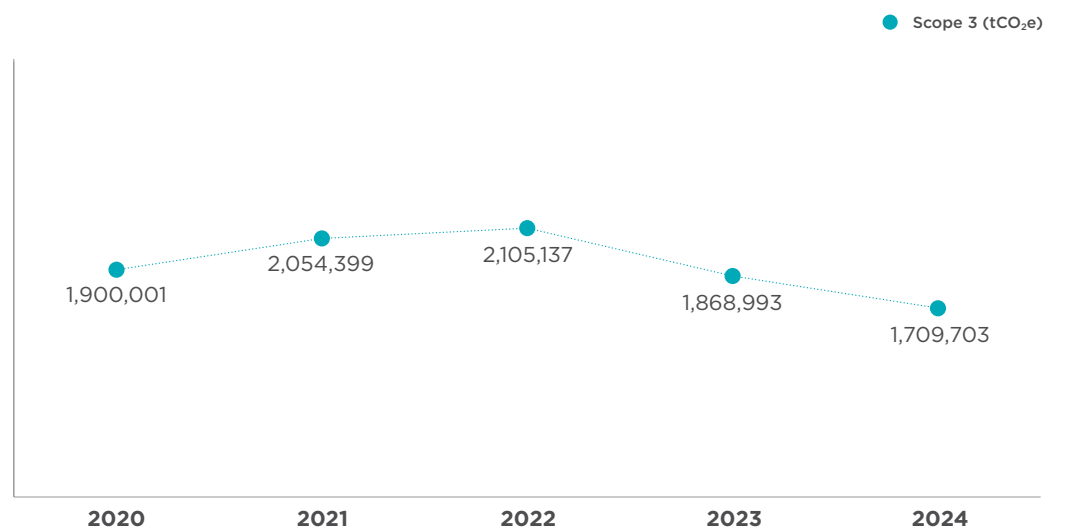


Fig. AGP Scope 3 decarbonisation progress



## ESRS E1: Climate change continued

### GHG emissions intensity

E1-6-54

	Unit	AMP		AGP		Ardagh Group	
		2023	2024	2023	2024	2023	2024
<b>Total GHG Emissions intensity on net revenue</b>							
Total GHG emissions intensity, location-based	mtCO <sub>2</sub> e/mioUS\$	609	518	1,258	1,228	926	847
Total GHG emissions intensity, market-based	mtCO <sub>2</sub> e/mioUS\$	596	507	1,249	1,211	915	833

### GHG emissions intensity on production

E1-6-54

	Unit	AMP		AGP	
		2023	2024	2023	2024
<b>Total GHG Emissions intensity on tonnes packed</b>					
Total GHG emissions intensity, location-based	mtCO <sub>2</sub> e	-	-	0.99	0.93
Total GHG emissions intensity, market-based	mtCO <sub>2</sub> e	-	-	0.98	0.92
<b>GHG Emissions intensity on 1000 pieces</b>					
Total GHG emissions intensity of can body <sup>1</sup> , location-based	kgCO <sub>2</sub> e/1000 pcs	46.6	38.6	-	-
Total GHG emissions intensity of can body <sup>1</sup> , market-based	kgCO <sub>2</sub> e/1000 pcs	45.1	37.1	-	-

<sup>1</sup> Includes data only for can body plants (4 can end plants + 1 hybrid plant excluded). Huron plant (hybrid) data omitted because of combined reporting for cans and ends (will be included in 2026 when separated 2025 data for cans and ends is available).

### Delivering consistent environmental management standards

In August 2024, AMP and AGP achieved International Organization for Standardization (ISO) 14001 certification for our environmental management system (EMS) at all production facilities. ISO 14001 is an internationally recognised standard that provides companies with a framework to monitor and control their environmental performance through efficient resource management and waste reduction.

## ESRS E1: Climate change continued

### Internal carbon pricing

E1-8-63(a)

Ardagh Group has developed an internal capital expenditure allocation process for all sustainability projects that is integrated in the annual budget approval processes across each regional operation. Each region is allocated a budget and approval for projects that deliver a return on investment (ROI) based on tonnes of CO<sub>2</sub>e emissions eliminated or avoided.

#### AMP

AMP is not currently subject to any carbon trading scheme. However, our climate scenario analysis identified carbon pricing as a future potential risk from emerging regulations. In that modelling, we estimated the following, based on the mass of the aluminium we procured at the time:

- CO<sub>2</sub>e emissions for aluminium with a 78% recycled content = 1,931,416 tCO<sub>2</sub>e
- Estimated CO<sub>2</sub>e emissions for aluminium using an average recycling rate as a proxy for recycled content at 47% = 3.2 million tCO<sub>2</sub>e
- The difference between 78% recycled content and 47% (industry level) recycled content is equivalent to 1.27 million tCO<sub>2</sub>e (3.2 million tCO<sub>2</sub>e - 1,931,416 = 1.27 million tCO<sub>2</sub>e)

**Implications:** By using aluminium with more recycled content, we can build resilience against the emerging regulations such as the Carbon Border Adjustment Mechanism (CBAM). We believe this opportunity can significantly reduce our exposure to the tightening of current carbon trading schemes and future new carbon pricing mechanisms.

### AGP

AGP operates in regions subject to emissions trading schemes, including the EU Emissions Trading System and California's Cap-and-Trade programme. While AGP does not currently apply an official internal carbon price, we incorporate prevailing, local carbon prices from these emissions trading systems when evaluating decarbonisation projects. In jurisdictions where carbon pricing is not currently in place or forecasted, we apply a conservative proxy of €100 per metric tonne of CO<sub>2</sub>e to support consistent and risk-aware investment decisions.

**Implications:** By embedding market-based and proxy carbon pricing into our project modelling, AGP strengthens its ability to manage carbon-related regulatory risks and respond to developments such as the CBAM and the possible expansion of carbon pricing globally.

AGP has also integrated sustainability considerations into our capital expenditure planning. Each region is allocated a general budget, from which funds may be directed toward sustainability projects. These allocations are subject to approval based on clear return on investment (ROI) criteria, including anticipated reductions or avoidance of CO<sub>2</sub>e emissions.







Spotlight:

## AMP-Europe driving renewable progress with a new vPPA in Portugal

Ardagh Metal Packaging-Europe (AMP-Europe) continues to accelerate its transition to renewable electricity through a new virtual Power Purchase Agreement (vPPA) signed with BNZ in Portugal. Starting in 2026, this 12-year agreement will secure 146 GWh per year of renewable electricity certificates – expected to offset around 36% of AMP-Europe's total electricity consumption across the continent.

This marks the second major renewable energy agreement for AMP-Europe in 2024, following a solar vPPA in Germany secured earlier in the year. Together, these projects represent significant progress toward AMP-Europe's goal of sourcing 100% of its electricity from renewable sources by 2030.

The project was supported by Schneider Electric, a leading adviser in renewable energy procurement and carbon management, who guided AMP-Europe through project selection and negotiations.

AMP-Europe's collaboration with partners like BNZ and Schneider Electric reflects shared values and a joint commitment to accelerating a clean energy transition and is a major step towards AMP's CO<sub>2</sub> reduction and renewable electricity goals.

Image: Aerial shot of solar field





**Spotlight:**

## AGP-Europe accelerates renewable electricity across the region

AGP-Europe continues to advance its goal of sourcing 100% renewable electricity by 2030 through a series of long-term agreements and on-site projects across the region.

Recent highlights include a Virtual Power Purchase Agreement (vPPA) with Rezolv Energy's St. George solar project in Bulgaria and a wind power PPA with RPC's Vitberget cluster in Sweden. Together, these agreements are expected to provide over 150 GWh of renewable electricity annually.

In Germany, a solar PPA with ENERPARC supports the NextGen Furnace at Obernkirchen and also supplies AMP facilities - marking the first PPA to serve both AGP and AMP.

On-site solar installations are also growing with both our Moerdijk and Irvine facilities now generating electricity on-site. These efforts reflect AGP-Europe's commitment to long-term energy resilience, regional diversification and commitment to progressing its renewable energy targets.



Image: Ground-mounted solar array

# ESRS E2: Pollution

At Ardagh Group our workforce is actively engaged in implementing and supporting pollution prevention measures related to air, water, and soil. Each manufacturing facility is certified against ISO 14001 and assesses itself against the Ardagh Group BGreen7 standards to reduce environmental risks, to mitigate the risk of environmental incidents and to control and reduce environmental impact.



## Pollution IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Pollution of air</b>					
Glass manufacturing processes such as melting, forming and annealing and aluminium converting processes such as printing and lacquer application create emissions.	Negative impact		●		We manage air emissions through a combination of good operational practices – such as burner optimisation, investing in cleaner technologies and preventive maintenance – emissions abatement technologies (e.g., VOC capture control systems) and compliance with local air permitting requirements.
Using renewable energy sources can reduce the combustion of fossil fuels, decreasing air pollutants.	Positive impact		●		Set a 2030 goal of 100% renewable energy. Currently achieved 30% at AMP and 20% at AGP.
Adoption of energy-efficient equipment and techniques can lower the emissions from manufacturing activities.	Positive impact	●	●	●	Evaluating and testing step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions. We remain committed to long-term investment that supports enduring operational improvements.
High energy intensity in supplier's mining process contributing to air pollution.	Negative impact	●			Our responsible procurement policy requires that our suppliers must understand their organisational environmental footprint and establish a programme for prevention of pollution: e.g. CO <sub>2</sub> emissions.



## ESRS E2: Pollution continued

### Pollution IRO table continued

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Pollution of water</b>					
Water used in the manufacturing process can become contaminated with chemicals and heavy metals, contributing to water pollution if untreated.	Negative impact		●		We manage water pollution through on-site pre-treatment, discharge to municipal systems, or third-party treatment, depending on facility needs. These measures control pollutants like heavy metals, oils and nutrients, and are governed by BGreen7 standards and local permit requirements.
Encouraging water recycling and conservation within manufacturing processes can minimise water wastage and pollution.	Positive impact		●		Implemented internal closed-loop water systems as a key practice to reduce water consumption and minimise pollution whenever feasible.
Water scarcity may be accelerated by pollution, leading to increased costs and conflicts over water resources.	Risk	●			We assess water stress using the WRI Aqueduct Water Risk Atlas to identify and benchmark facilities in high-risk regions, prioritising them for water efficiency investments where needed. To help protect water quality and prevent pollution-related scarcity, we conduct regular equipment checks (e.g., oil-water separators and wastewater controls) and, in some regions, implement Contingency, Emergency, and Spill Prevention Plans to address wastewater incidents.
Enhancing sustainable water management practices can improve the company's environmental footprint and reputation with stakeholders.	Opportunity		●		Ardagh Group has set 2030 water intensity reduction targets across both businesses: 20% for AMP and 26% for AGP. In addition, our internal environmental management system standards include limits on wastewater pollutants, which apply where local regulations or permits do not set stricter thresholds.
<b>Pollution of soil (and respective loads)</b>					
Extraction activities may result in the release of heavy metals and pollutants into the soil (via by-products and wastewaters).	Negative impact	●			We seek to minimise upstream environmental impacts by working with suppliers to improve responsible sourcing practices and by increasing recycled content in our packaging. Reducing reliance on virgin raw materials helps lower the risk of pollution from extraction-related activities.
Soil pollution can impact future land use and cause regulatory complications and sanctions.	Risk	●		●	We engage suppliers through responsible sourcing expectations to help minimise environmental risks – such as soil pollution – associated with raw material extraction and processing. By increasing recycled content, we reduce our reliance on virgin raw materials, helping to limit the land use and contamination risks tied to extractive activities across our value chain.

## ESRS E2: Pollution continued

### Site screening

#### ESRS 2 IRO-1-11(a)

Across Ardagh Group, we operate key processes to identify pollution-related IROs in both our operations and our upstream and downstream value chain. Our emissions reduction systems include for example, combustion optimisation equipment, electrostatic precipitators and selective catalytic reduction technologies.

Our employees are actively engaged in implementing our pollution prevention measures related to air, water and soil. Their experience and knowledge ensure our approach to pollution prevention and control directly relates to operational realities, contributing to more effective and locally grounded environmental performance.

Our approach includes:

- Monitoring emissions and regular equipment checks on systems such as oil-water separators and wastewater controls
- Reporting environmental incidents and performing incident investigations using the Ardagh Group Risk Management System (ARMS), sharing learnings as pro-active measures across facilities and regions
- Periodic self-assessments against BGreen7 standards, our environmental management framework
- Site-level audits, inspections and environmental procedure reviews
- Data collection and operational reviews related to permitting requirements, such as air dispersion modelling to track effluent discharges

- Evolving environmental practices through structured safety or improvement programmes
- Developing and testing Contingency, Emergency and Spill Prevention Plans to address issues such as spill drills, air release scenarios and wastewater incidents

### Community consultation

#### ESRS 2 IRO-1-11(b)

In line with the ISO 14001 certification, all manufacturing facilities evaluate the needs and expectations of interested parties/stakeholders. This includes the interests of the communities around our locations. These evaluations together with the environmental aspects and impacts analyses determines information exchange with local communities.

### E2-1 Policies to control pollution

#### E2-1-14, 15

In March 2024 we published our revised Environmental Policy. This sets out Ardagh Group's responsibility to natural resources, with a commitment to continuous improvement in industrial performance. The objectives of the Policy are to:

- Ensure material compliance with environmental and operational licences, environmental regulations, internal control standards and other requirements
- Limit incidents with environmental impacts
- Minimise the impacts of its operations on the environment
- Ensure good environmental practices and continuous improvement through environmental management systems in our factories

Our Responsible Procurement Policy which defines the expectation that upstream of our value chain there is:

- Adherence to legal requirements
- Completion of an environmental risk assessment, at minimum annually
- An established programme for prevention of pollution to e.g. water use, CO<sub>2</sub> emissions
- Sustainable use of resources including use of recycled content
- Appropriate collection and disposal of waste that must be managed with authorised service providers
- Requirement to manage all chemicals responsibly, including: controlling exposure of humans and the environment to hazardous chemicals; eliminating carcinogenic, mutagenic or toxic for reproduction substances (CMR substances) and EU/UK substances of Very High Concerns delivered to Ardagh Group; and ensure products are registered and approved with EU REACH and other legal requirements
- Periodic environmental assessments are carried out in our plants to evaluate environmental impacts, risks and opportunities

Our policies and procedures around the prevention of or correction to the risk of pollution, emergency preparedness and response procedures align to ISO 140001. Within the ISO 14001 Standard, any environmental risk of significant impact requires an operational control procedure to control the risk and establish robust control measures to mitigate and reduce pollution.

We have implemented structured Environmental Control Standard (ECS) built upon four pillars: ISO 14001 certification; BGreen7; incident root cause analysis; and action planning with capital expenditures (capex) and operational expenditures (opex) integration. Under our BGreen7 environmental management framework, we have established minimum policy requirements and proactive controls across five key impact areas, including air emissions, soil contamination, water consumption and wastewater discharge. Our framework encourages site-level participation in environmental risk assessments, operational controls and incident response activities to help reduce pollution and our impact on the environment.

### E2-2 Actions and resources related to pollution

#### E2-2-18, E2-2-19(a-c)

#### Reducing impacts on natural resources

Compliance to regulatory requirements is non-negotiable for Ardagh Group. In 2024, we rolled out our BGreen7 standards focusing on implementing a solid foundation to prevent environmental incidents, to accentuate active management and to straighten environmental responsibilities across all hierarchical levels.

Every manufacturing facility is challenged to complete a self-assessment to explain how they control and mitigate negative impacts, which includes applying environmental controls. BGreen7 targets the significant environmental impacts of our manufacturing processes causing pollution to air, soil, wastewater as a consequence. BGreen7 follows the ISO 14001's underlying approach of risks and opportunities and define requirements, which looks to reduce the risk of pollution and at the same time to demonstrate good practice of day-to-day management of environmental processes.



## ESRS E2: Pollution continued

For air pollution, we focus on controlling airborne emissions, preventing the release of Legionella, managing noise impacts on neighbouring communities and natural surroundings, and phasing out the use of fluorinated gases and ozone-depleting substances.

Our manufacturing processes (glass and cans) have a limited direct impact on soil (in the sense of agriculture, excavation or deposition of material and substances on the natural soil.) Any soil pollution is a consequence of airborne emissions that return to ground, water use (that ends up as wastewater) and waste creation. We address soil pollution through compliance-based measures, including Spill Prevention Plans, secondary containment systems and site-level adherence to BGreen7 protocols. Defined concerns are addressed in our Spill Response Plans. Our BGreen7 Standards include bunded containment for tanks, double-walled piping, monthly inspections, emergency spill protocols, and waste area containment to prevent ground contact. These collectively form Ardagh Group's policy-based approach to soil pollution mitigation.

We aim to reduce our water use and preserve this resource for water-stressed areas. In reducing the volume of water we use, we strive to evaluate and consider pollution that enters the water streams we control. Our BGreen7 standards include a mandatory list of pollutants to be measured covering areas with less strict water-related regulations or permits. For instance, at AGP this includes typical parameters such as chemical oxygen demand (COD) and suspended solids. For facilities based in Europe, all facilities report the parameters as demanded by the regulations on the European Pollutant Release and Transfer Register (E-PRTR). We operate internal closed-loop water systems to reduce water consumption and minimise water pollution.

Water use is monitored at our facilities, with efforts underway to enhance daily monitoring practices and formalise immediate leakage checks when abnormal consumption is identified. Pollution prevention measures include separating stormwater from sanitary sewers and emergency spill response protocols (see E2-1). We also monitor emissions to water from our industrial processes and implement controls to ensure compliance with regulatory discharge limits. Pollutants monitored include pH, total suspended solids (TSS), COD, hydrocarbons, heavy metals, adsorbable organic halogens (AOX), and fluoride.

Wastewater from manufacturing processes is treated on-site where applicable, then discharged in accordance with local regulations. Wastewater discharges, including from production and sanitary sources, are analysed across all facilities; and in the absence of local regulations or less strict regulatory requirements, we have started to apply our own internal pollutant thresholds as outlined in the BGreen7 Wastewater Standard.

We formally document all incidents and learnings, to share with our network of facilities.

### Emergency preparedness

To mitigate the impacts of events, our locations assess and document their emergency response procedures. These include spill drills, severe weather responses and mock air emissions releases. All employees receive relevant training.

We have formal emergency preparedness and response procedures in place, aligning to ISO 14001. Included in the plants' Emergency Response Plans (ERP) or Emergency Preparedness Plans (EPP), these include direction on the organisation, communication, and actions to be followed in the event of an environmental accident or emergency.

When spills or discharges occur, we use dedicated professionals to evaluate and plan for successful containment and remediation. We work in close cooperation with local authorities and have equipment and resources as part of our standard operating procedures. We formally document all incidents and learnings, to be shared with our network of facilities.

### Reducing pollution through how we use materials

Our programmes, actions and improvement programmes follow the waste hierarchy of avoiding, reducing and re-using materials to manage and mitigate environmental impacts. At AGP-Europe we follow BAT (best available technologies) and direct resources and expertise to be an active part in future BAT for the glass industry. All facilities follow local legislation and permitting limits for all potential pollutants.

The Standard Operation Procedure (SOP) Chemical Substance Management and BGreen7 standard (covering ozone-depleting substances or fluorinated substances) describe how to phase out critical substances according to regulations and do not allow the introduction of these substances. The substances defined as "substances of very high concern" (SVHC) by the EU are forbidden and need to be phased out by all facilities. Products containing SVHC or similar in other countries (e.g. the US) are not allowed to be introduced. CMR (Carcinogenic, mutagenic and reprotoxic substances)-declared products are forbidden to be introduced as well.

Our priority is to comply with all legal regulation. Our zero waste to landfill guidance contains our mitigation hierarchy for land pollution. We first control and minimise our impacts through our ECSs (see E2-1). The second layer is aligning with local air, water and waste permit conditions to manage impacts of the risk level of pollution. Deviations to these requirements are captured and addressed in ARMS incident reporting.

Our typical emissions / pollutants include NOx, SOx and VOC. The combustion burner technologies we use in our furnaces and designs mitigate NOx formation, and we have added selective catalytic reduction (SCR) to our industrial processes. SOx is measured and reported in the same approach as NOx and VOC. We aim to reduce VOC emissions via technology upgrades and supplier engagement on lower-emissions materials.

## ESRS E2: Pollution continued

### E2-3 Pollution targets

E2-3-23(a-b)

Our Ardagh Group-wide pollution-related targets are part of our sustainability strategy, guided by ISO 14001 standards and our BGreen7 environmental management framework.

While we have no formal stakeholder engagement process specific to pollution target-setting, our pollution targets reflect the input and operational insight of senior leaders across Ardagh Group's global manufacturing footprint. The sustainability targets are approved by our Board-level Sustainability Committee, aligned with our Environmental Policy. They complement mandatory environmental controls established through site-specific air, water and waste permits.

- VOCs (AMP only): reduce VOC emissions intensity by 10% by 2030 (from a 2020 baseline)
- Zero waste to landfill: achieve zero waste to landfill status by 2025 for AMP manufacturing facilities and 2030 for AGP manufacturing facilities<sup>1</sup>

The above targets apply to all Ardagh Group-owned manufacturing facilities but do not extend to upstream or downstream value chain activities. Additional detail is explored in E1 Climate change, E3 Water and marine resources and E5 Resource use and circular economy.

🔗 [For more detail, see E1 and E5 \(pg.28 and pg. 63\)](#)

Ardagh Group's current objective is to ensure continuous compliance with all applicable water discharge regulations across its operations, while progressively reducing discharge volumes and improving water quality through engineering controls and operational best practices. Our BGreen7 standards include internal levels of wastewater pollutants where stricter levels defined by regulations or permits are not present. For more information, see E3 Water and marine resources.

🔗 [For more detail, see E3 \(pg. 53\)](#)

#### Methodology and assumptions

We define pollution KPIs on an intensity basis, measured as emissions or waste per tonne of finished product (AGP) or per 1,000 units of finished goods (AMP). We calculate performance using verified internal platforms and protocols, including Tagetik, Ardagh Risk Management System (ARMS) and ISO 14001-aligned data collection methodologies.

Key assumptions include:

- 2020 baseline year
- Continuous improvement through equipment upgrades and process optimisation, including combustion efficiency and abatement system performance
- Stable production volumes and operating scale across core product lines

We review progress periodically and integrate outcomes into our broader sustainability governance and performance management processes.

### Pollution of air

E2-4-28(a)

AMP pollution to air	Unit	2023	2024
VOC	Kg	2,655,638	2,733,461

AGP pollution to air	Unit	2023	2024
NOx <sup>1</sup>	Metric tonnes	6,039	6,146
Particulates – PM10 <sup>1</sup>	Kg	506,842	416,200
SOx	Metric tonnes	4,180	4,321

<sup>1</sup> Excludes AGP-Africa

### E2-4 Reporting on performance

E2-4-30(a-c)

Our BGreen7 standard on wastewater and rainwater pollutants defines a mandatory list of pollutants to be measured in the absence of more strict regulatory demands or obligations by permits. This includes typical parameters such as COD and suspended solids. All facilities located in Europe report emissions and transfers of pollutants in compliance with the requirements of the E-PRTR, as implemented under national regulatory frameworks. SOx, NOx, and VOCs are all measured and reported using the same approach. These emissions are included in our reporting system (ARMS and Tagetik) as absolute values and intensities.

We disclose our performance within our annual sustainability report. All facilities report environmental data in an Ardagh Group document provided by the Sustainability team, ensuring a consistent approach to data calculation and enabling meaningful comparisons across facilities and regions.

Although local norms and regulations may vary across the countries where we operate, we employ certified consultants to consistently sample and assess potential pollutants. Our reporting system includes standardised calculations, such as conversions between metric and imperial units, to maintain accuracy and comparability.

Our Environmental Data Handbook outlines how to report emission data. To make data comparable across regions and facilities the units used in the reports are re-calculated in standardised units, with external assurance. The Handbook covers production, waste management, water, energy and air emissions and describes reported information, applicable formulas, calculation factors and source types.

<sup>1</sup> Zero waste to landfill applies only to operational waste streams, and implemented in accordance with internal standards and local regulations.

# ESRS E3: Water and marine resources

The acceleration of climate change is putting pressure on limited supplies of fresh water, making this a priority topic for ecosystems, communities, our customers and the future of the business.

## Water and marine resources IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Water consumption</b>					
Manufacturing processes, such as cooling and cleaning, may consume large volumes of water, potentially causing local water scarcity.	Negative impact		●		Ardagh Group has set 2030 water intensity reduction targets across both businesses: 20% for AMP and 26% for AGP.
Increasing water scarcity due to climate change may increase operation costs or limit production capacities.	Risk		●	●	We assess water stress using the WRI Aqueduct Water Risk Atlas to identify and benchmark facilities in high-risk regions, prioritising them for water efficiency investments where needed. We continue to explore closed-loop water systems as a key practice to reduce water consumption.
Implementing efficient water management strategies and technologies can lead to significant water savings in the manufacturing process.	Positive impact		●		We aim to further invest in water efficiency projects, including measuring, recycling and optimising water usage.
<b>Water withdrawals</b>					
High volume of water withdrawal from groundwater for operations can lead to falling water tables and water scarcity.	Negative impact	●			We address water-related risks in our value chain through our sustainable procurement practices, which include expectations around responsible resource use. Our supplier standards encourage transparency and mitigation of environmental impacts, including groundwater withdrawal, to help reduce pressure on local water resources and avoid contributing to scarcity.
Developing a comprehensive water management strategy focusing on the water recycling and engagement in community water stewardship initiatives can add value to business operations and enhance stakeholder relationships.	Opportunity		●		To ensure the continual improvement of our plants, we implement and maintain an environmental management system in accordance with the ISO 14001 standard.
Over-reliance on local water sources for operations can put pressure on community water supplies.	Negative impact	●	●	●	We aim to further invest in water efficiency projects, including measuring, recycling and optimising water usage

## ESRS E3: Water and marine resources continued

### Water and marine resources IRO table continued

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Water discharges</b>					
Untreated water discharges can lead to severe penalties or operations suspension due to regulatory non-compliance resulting in business loss.	Risk	●	●	●	We manage water discharge risks across our operations through BGreen7 environmental programme, which require compliance with local discharge permits and set internal expectations for controlling key pollutants such as heavy metals, oils and nutrients. In our value chain, we promote responsible water management through our sustainable procurement practices, encouraging suppliers to prevent untreated discharges and comply with relevant environmental regulations.
Regular water quality and/or effluent testing can ensure discharged water is within acceptable parameters, reducing pollution risks.	Positive impact		●		We conduct regular water quality and effluent testing in line with permit requirements and internal expectations. These practices are governed by our BGreen7 environmental programme, which defines minimum standards for water management and requires facility-level implementation and documentation.
Improvements in waste management and water use within production facilities can lead to lower waste generation, reducing the volume of discharge into local bodies.	Opportunity	●			We aim to further invest in water efficiency projects, including measuring, recycling and optimising water usage.



## ESRS E3: Water and marine resources continued

### Our approach to water governance and policies

E3-1-11, E3-1-12(a), E3-1-13, E3-4-28(e)

Water stewardship is a key focus under the Ecology pillar of Ardagh Group's sustainability strategy. As water is essential to our manufacturing processes – from forming and cooling to rinsing and washing – we recognise its value not only in our operations but also across the full food and beverage packaging value chain.

We manage water-related impacts, risks and opportunities through a structured environmental governance framework. This includes ISO 14001-certified Environmental Management Systems, the internally developed BGreen7 programme and ARMS for environmental data tracking and risk mitigation. Together, these systems provide standardised guidance for water sourcing, consumption, discharge, reuse and pollution prevention across all facilities.

BGreen7, implemented in 2024, establishes minimum environmental requirements applicable at all Ardagh Group facilities. These requirements are reinforced through periodic self-assessments and facilities are expected to ensure effective implementation. BGreen7 includes specific water management standards covering withdrawal monitoring, quality control (via on-site or third-party treatment) and discharge compliance. These practices are embedded in facility-level operations regardless of local water stress status.

Water consumption and discharge are tracked monthly, historically through ARMS, using data from smart meters, supplier invoices and facility-level registers. Regulatory permits and documentation related to wastewater discharge and treatment are maintained at all facilities. To support enhanced data quality, consistency and ESG reporting, Ardagh Group is transitioning its environmental data management into Tagetik, a new enterprise platform commissioned to strengthen sustainability reporting and streamline performance tracking. Ardagh Group's Environmental Data Reporting Handbook continues to define key indicators to ensure standardisation during and after the transition.

To identify areas of heightened water-related risk, Ardagh Group uses the WRI Aqueduct Water Risk Atlas methodology. As of the reporting period, 7 AMP facilities and 12 AGP facilities are located in regions of high or extremely high-water stress. While the BGreen7 programme provides a unified sustainability framework across all manufacturing facilities, facility-specific policies are not currently in place. The need for such localised governance is under review as part of the ongoing development of Ardagh Group's water stewardship strategy.

### Water use, design and water-stressed areas

E3-1-12(a-c)

We manage water use, discharge and related risks through a structured, facility-level approach anchored by ISO 14001-certified environmental management systems and the BGreen7 programme. These systems guide operational practices on water sourcing, treatment, reuse and pollution control, while enabling transparency and performance monitoring.

Water is withdrawn from municipal sources, groundwater, surface water, and, in select cases, harvested rainwater. All withdrawals are metered and regulated under local permits. To reduce dependency on freshwater, we strive to use closed-loop systems and rainwater reuse.

Used process water is treated on-site or pre-treated before discharge to municipal treatment facilities or shipped for treatment. Wastewater quality is monitored regularly for parameters such as chemical oxygen demand (COD), total suspended solids (TSS), hydrocarbons, heavy metals and AOX. In addition, rainwater from high-risk areas (e.g., rooftops and bulk material storage zones) is analysed every two years. Infrastructure and procedures are in place to prevent pollution – including separation of rainwater and wastewater flows, emergency spill response protocols and inspection and maintenance of sewer and containment systems. These measures reflect the minimum requirements established by BGreen7.

Product and manufacturing design also reflect water-related considerations. Efficiency initiatives such as lightweighting of glass containers and aluminium cans and continuous process optimisation for both metal and glass containers help lower water intensity in operations. While Ardagh Group does not offer water- or marine-related services, we believe its pollution prevention practices support ecosystem protection by minimising contaminants in runoff and wastewater.

### Assessing risks

ESRS 2 IRO-1, ESRS E3-8(a)

To identify and assess production facilities at high risk of water stress we use the WRI Aqueduct Water Risk Atlas methodology.

AMP operates 23 production facilities across 9 countries, all of which are included in the Aqueduct assessment. In 2024, we evaluated all production facilities worldwide by location and address. Six out of the 23 production facilities were rated as 'high' risk, and one rated as 'extremely high' according to the WRI Aqueduct Water stress indicator.

AGP operates 35 production facilities across 13 countries, all of which are included in the Aqueduct assessment. In 2024, we evaluated all production facilities worldwide by location and address. Five of our production facilities were rated as "high" risk, and seven facilities were rated as "extremely high" risk according to the WRI Aqueduct Water stress indicator.

**Spotlight:**

## AMP: Investing in plant water efficiency

At AMP, within our Valdemorillo facility in Spain that has a “high” water risk rating under the WRI Aqueduct Water Risk Atlas methodology, we have implemented an active system upgrade that optimises and controls washer overflow, significantly reducing water usage. The initiative uses an advanced real-time monitoring system to control the flow according to chemical triggers. This helps to minimise losses and associated discharges, increasing water efficiency. In addition, we have carried out projects to replace auxiliary cooling equipment. Together, investments of US\$340,000 for these upgrades resulted in 2024 water savings of 30% from our baseline 2020 levels and has achieved one of the lowest water intensity levels across all our can body manufacturing facilities.

In the United States, at our AMP production facility in Fairfield, California we replaced 50% of the lawn with water-conserving landscaping. This initiative will save approximately 6,435 m<sup>3</sup> of water annually.

At our Chicago manufacturing facility that is rated as “high” water risk, AMP made significant investments of US\$4.2M, replacing an older washer technology with a newer washer in 2024. Washer water reduction was accomplished with capturing and recycling rinse water. Additionally, an older steam boiler was replaced with a closed loop hot water system along with stack heat exchange condensate capture on this washer. The water intensity for the plant decreased by 21% between 2024 and 2023.

**Image: Valdemorillo counterflow system**



## ESRS E3: Water and marine resources continued

### Reducing water use in our operations

E3-2-17, 19

Water is a finite and essential resource, and we are committed to reducing usage across our operations. In 2024, our capital expenditure on water efficiency projects included water meters, recirculation and washer improvements.

To ensure the continual improvement of our facilities, we implement and maintain an environmental management system in accordance with the ISO 14001 standard. The Ardagh Group Risk team defines and develops corporate expectations and control standards. To ensure adherence to our [Environmental Policy](#), we maintain appropriate assurance controls, including regular compliance checks and annual management reviews.

We have identified water scarcity as a growing concern. Our strategy to mitigate against this is to implement water efficiencies and benchmark water usage across our facilities and apply best practices across our operations, with added focus in production facilities located in areas of high-water stress. We take a proactive approach to managing water-related risks by identifying current and future water stress in the regions where we operate, using tools such as the WRI Aqueduct Water Risk Atlas. Regular monitoring helps us anticipate climate-related challenges and strengthen our adaptive capacity. See the spotlight section for case study examples.

### Meeting our water intensity target

E3-3-22, E3-3-23(c)

We have set 2030 water intensity reduction targets across both business units. AMP aims to reduce water intensity by 20%, while AGP targets a 26% reduction. These targets apply globally, regardless of water stress classification.

By the end of 2024, AMP had achieved a 6% reduction, keeping it on track toward its goal. As at the end of 2024, AGP's water intensity had exceeded its 2020 baseline by 15%, highlighting the need for renewed focus and targeted interventions.

To guide implementation, water use is benchmarked at the facility level. Facilities located in water-stressed areas are prioritised for capital investment in efficiency, recycling and reuse technologies. Water intensity remains a key focus area across Ardagh Group, and we continue to invest in facility-level improvements to support long-term water stewardship.

In 2024, the Carbon Disclosure Project (CDP) awarded AMP and AGP an environmental management score for sustainability performance, scoring B for water management. This means we are among the highest-rated companies in all industries scored by CDP. Our assessments include measuring and analysing our incoming and outgoing water, as well as overall resource utilisation. An external third-party verification process validates our water withdrawal and discharge performance.

### Disclosing our performance

E3-3-23(a), E3-3-25

We are committed to transparency and accountability in our sustainability efforts. We recognise the importance of disclosing how our voluntary targets contribute to improving water quality. Our annual sustainability report includes detailed

information on our progress towards these targets. We report on the measures we have implemented to enhance water conservation and sustainable use, such as investments in water efficiency, recycling and reusing water. We believe these initiatives help us to achieve our water intensity reduction goals and contribute to the overall improvement of water quality in our operations.



## ESRS E3: Water and marine resources continued

### Water withdrawal, consumption and intensity

E3-4-28(a-d), E3-4-29

AMP	2023	2024 <sup>2</sup>
Total water consumption (m <sup>3</sup> )	338,191	353,151
Total water consumption (m <sup>3</sup> ) vs revenue (US\$)	70	72
Withdrawals from water-stressed locations (m <sup>3</sup> ) <sup>1</sup>	1,333,403	1,343,316

<sup>1</sup> Stress locations are defined as high and very high risk location according to WRI Aqueduct Water Risk Atlas criteria baseline water stress, as required by CDP.

<sup>2</sup> New WRI Aqueduct Water Risk Atlas results for classification available.

Water withdrawals from areas of water stress rose slightly in 2024 by 0.74% vs 2023. This was due to business growth as well as an increase in the amount of land where we operate deemed “water stressed” in 2024. We continue to monitor and implement efficiency projects to improve our water intensity.

AGP	2023	2024 <sup>2</sup>
Total water consumption (m <sup>3</sup> )	1,508,519	1,380,756
Total water consumption (m <sup>3</sup> ) vs revenue (US\$)	329	326
Withdrawals from water-stressed locations (m <sup>3</sup> ) <sup>1</sup>	1,495,619	1,418,914

<sup>1</sup> Stress locations are defined as high and very high risk location according to WRI Aqueduct Water Risk Atlas criteria baseline water stress, as required by CDP.

<sup>2</sup> New WRI Aqueduct Water Risk Atlas results for classification available.

As previously noted, AGP operates seven facilities in areas of “Extremely High” water stress and five in areas of “High” water stress. In 2024, water intensity across these 12 facilities increased by 2% compared to our 2020 baseline but improved by 11% year over year. Despite this regression in performance, all 12 facilities remain below the average water intensity for their respective regions.





# ESRS E4: Biodiversity and ecosystems

Biodiversity is an increasingly important consideration in understanding the broader environmental impacts of industrial activity. As part of our sustainability journey, we are beginning to explore how our operations intersect with biodiversity and how we can support nature-positive outcomes over time.

As we advance our understanding of this topic, we will consider ways to integrate mitigating actions for our biodiversity impacts into our decarbonisation roadmaps.

🔗 [For more detail on our decarbonisation roadmaps, see E1-1 \(pg. 32\)](#)

## Biodiversity transition plan

E4-1-13(a-f)

To ensure a greater understanding of Ardagh Group's potential impacts on biodiversity, we are working to gain a full understanding of our value chain impacts. While our current actions related to climate, water and pollution already contribute to mitigating nature-related risks, further investigation is required to identify additional impacts not yet addressed.

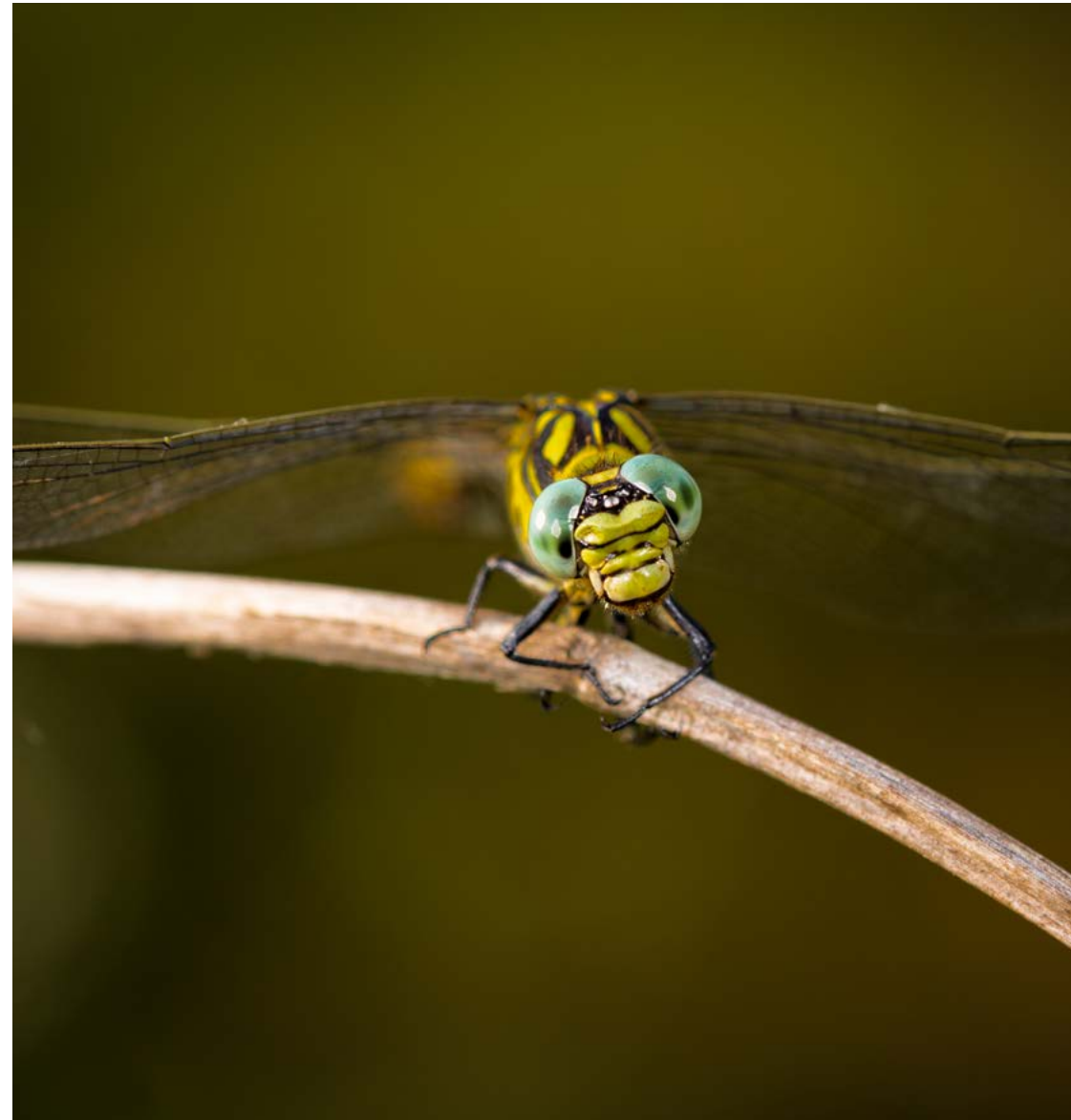
As part of this process, we plan to adopt the initial phases of the Taskforce on Nature-related Financial Disclosures (TNFD) framework – specifically the Locate and Evaluate stages. These steps will help us to map our interfaces with nature across our operations and value chain, and they will help us assess the materiality of our dependencies and impacts on biodiversity.

Insights gained through this approach will be used to assess whether further actions are required. When we have fully identified our direct operational impacts and actions needed, we will consider developing a suitable strategic approach for our value chain.

🔗 [For more detail, see DMA and value chain \(pg. 15 and 11\)](#)

Once we have assessed our value chain, in addition to our direct operations, we can explore the possibility to produce an analysis of the resilience of our business model and strategy in terms of the unique dependencies, impacts risks and opportunities (DIROs) in relation to AMP and AGP. In addition, this DIRO process will help identify relevant stakeholders for future engagement.

To ensure a greater understanding of Ardagh Group's potential impacts on biodiversity we are working to gain a full understanding of our value chain impacts.



## ESRS E4: Biodiversity and ecosystems continued

### Biodiversity and ecosystems IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Direct drivers of biodiversity loss – Climate change</b>					
Manufacturing's direct operations and supply chain can produce high levels of GHG emissions resulting in direct adverse effects on biodiversity.	Negative impact	●	●	●	AMP and AGP developed <b>structured decarbonisation roadmaps</b> . This plan applies across all our operations and is designed to reduce emissions across Scopes 1, 2, and 3. AMP & AGP are fully committed to reducing Scope 1 and 2 GHG emissions in line with limiting of global warming to 1.5°C and reducing Scope 3 emissions targets in line with limiting of global warming to 2.0°C.
Implementing energy-saving measures and targets such as achieving 100% renewable energy by 2030 can mitigate climate change impacts and indirect impacts on biodiversity loss.	Opportunity		●		We are investing in our electricity procurement strategy by securing Power Purchase Agreements, renewable energy contracts and certificates to further reduce reliance on fossil fuels and achieve our target of 100% renewable energy by 2030.
<b>Direct drivers of biodiversity loss – Land-use change, fresh water-use change and sea-use change</b>					
Land or sea-use changes – such as those related to bauxite or limestone mining – can cause long-term environmental harm and reputational damage. Extraction, processing and mining activities within the supply chain may directly contribute to biodiversity loss.	Risk	●			AMP and AGP are currently investigating this topic to better inform how we manage this risk. At this stage AMP and AGP conducted an IBAT assessment and identified facilities that are priority facilities for further investigation. In the short term, we are developing our strategies and position.
<b>Direct drivers of biodiversity loss – Pollution</b>					
Manufacturing activities may generate waste and hazardous by-products that, if not managed effectively, could harm biodiversity.	Negative impact		●		Set a zero waste to landfill goal for AMP (2025) and AGP (2030). To achieve this goal we aim to minimise waste in all of our operational processes, adopting a reuse and recycle approach wherever possible and limit waste-to-energy incineration.
Robust environmental management systems, adherence to local legislative guidelines and application of best practice in waste, water and air pollution management helps Ardagh Group mitigate harmful impacts on biodiversity.	Positive impact		●		Achieved ISO 14001 certification at all our plants as well as adopted an internal environmental management system that goes beyond local and federal regulation.
<b>Impacts on the extent and condition of ecosystems – Land degradation</b>					
Extraction processes can contaminate the soil with heavy metals and other harmful substances. Mining activities, such as bauxite and limestone extraction can lead to significant landscape alteration and land degradation.	Negative impact	●			AMP and AGP are currently investigating this topic to better inform how we manage this risk. At this stage AMP and AGP conducted an IBAT assessment and identified facilities that are priority facilities for further investigation. In the short term, we are developing our strategies and position.

## ESRS E4: Biodiversity and ecosystems continued

### Identification of material dependencies, impacts, risks and opportunities (DIROs) and their interaction with our corporate strategy and business model

IRO-1 & SBM-3, ESRS 2 SBM-3-26(a-c), ESRS 2 IRO-1-17(a-e), ESRS 2 IRO-1-19(a)

We are assessing our biodiversity impacts guided by the TNFD's LEAP assessment framework – Locate, Evaluate, Assess and Prepare. Our initial focus is to understand where we interact with nature, with future analyses to explore how our activities and value chain may impact biodiversity aligned with the Evaluate stage of LEAP.

#### Own operations – interfaces with protected areas

For this report, we focused on identifying our direct operations' priority locations for biodiversity and ecosystem impacts.

##### Step one:

Conducted a [WWF Biodiversity Risk Filter](#) (BRF) analysis. The risk indicators in this tool are especially relevant for prioritising facilities in terms of water availability, key biodiversity areas, protected/conserved areas, facilities of international interest and other important delineated areas. For these selected risk indicators, we identified priority facilities as those with a BRF risk score of higher than 3.4 (the “high-risk” threshold for at least one indicator) after conducting an initial BRF analysis of all 60 Ardagh Group manufacturing facilities.

#### Buffer zones

We followed IBAT best-practice recommendations and applied a default buffer zone of 20km. By applying this default zone, we are ensuring our assessment is replicable and auditable as well as avoiding the selection of an operation type that does not align with our activities.

##### Step two:

Conducted an Integrated Biodiversity Assessment Tool (IBAT) analysis using the IBAT's Disclosure Preparation (DP) Report to assess the level of overlap of our direct operations with biodiversity sensitive locations, i.e. the number of Protected Areas (PAs) and Key Biodiversity Areas (KBAs) within a certain buffer zone around each manufacturing facility.

This helped us to prioritise facilities for deeper investigation in relation to KBAs and PAs, while assessing biodiversity risk using [Species Threat Abatement and Restoration](#) (STAR) scores.

##### Step three:

To gain a full understanding of the biomes and ecosystems that our direct operations may interface with, and which may not have been captured by the IBAT DP report, we analysed the [RESOLVE Ecoregions and Biomes dataset](#) in relation to Ardagh Group's operations and applied a 20km buffer to analyse the interface of the facilities and surrounding biomes.

##### Step four:

We then aligned the ecoregions from the RESOLVE Ecoregions and Biomes dataset with the [IUCN Global Ecosystem Typology Report](#). An important distinction between the two datasets is that the RESOLVE dataset represents only the theoretical, natural biomes of a region and does not account for human-altered landscapes. In contrast, the IUCN Ecosystem Typology includes anthropogenically modified biomes, such as urban and agricultural areas.

### Summary of outcomes

The results identify how many (and which) facilities are classified by IBAT as “sensitive,” based on distance to a KBA or PA, their habitat restoration potential (STARR) and threat abatement potential (START), all based on a 20km buffer.

Facilities assessed as in or near a biodiversity-sensitive area are assigned a significance score by the IBAT DP report to aid facility prioritisation. High, medium and low scores are presented based on the proximity of the facility to a KBA or protected area relative to the buffer size, or based on the maximum START and STARR scores found within the AoI.

We evaluated all our production facilities worldwide to identify and evaluate production facilities located near ecologically sensitive areas, based on proximity to KBAs or protected areas and STAR scores within the facility's area of influence.

This IBAT analysis allowed us to identify facilities in order of priority from highest to lowest and give us insights into where our facilities are located within 20kms of protected areas as well as potential country hotspots.

#### Next steps – own operations

E4-3

All Ardagh Group-owned facilities were initially screened using the BRF analysis. Based on the risk indicators identified, priority facilities were further assessed using the IBAT to evaluate their biodiversity sensitivity. This step supported our understanding of each site's biodiversity value and sensitivity.

Impact assessment involves evaluating biodiversity's sensitivity and exposure to environmental pressures. To identify material impacts, an assessment of impact drivers is required at both corporate and facility levels.

Both IBAT and the BRF analysis clarify the types of nature that we engage with across our facilities.

Additionally, we have begun to assess our physical and transition risks and opportunities related to biodiversity. The same prioritisation and IBAT mapping help us to focus our efforts on locations with the highest potential biodiversity-related risks and dependencies.

We will next assess our reliance on ecosystem services at these priority facilities. Once we have conducted a full mapping of our direct operations and supply chain in relation to biodiversity, we will have a better insight into the systemic risks to which we may be exposed. We will also better understand the range of stakeholders that we should engage with and any concrete mitigation measures. In terms of our key material topics of climate change drivers of biodiversity loss and pollution drivers of biodiversity loss, see ESRS E1 & ESRS E2 to learn more about our management of these topics and emissions reductions targets.

[🔗 For more detail, see E1 and E2 \(pg. 28 and 48\)](#)

#### Next steps – value chain

E4-3

At the Ardagh Group level, we evaluated potential negative impacts from land degradation, desertification and soil sealing. Only land degradation was identified, and only within our value chain, not in our direct operations. The IBAT results will guide the selection of facilities for further assessment.

Once we have conducted a full mapping of our direct operations, we will review our value chain in relation to biodiversity. This will inform us about systemic risks that we may be exposed to and the appropriate stakeholders that we may need to engage with, as well as any concrete mitigation measures.

## ESRS E4: Biodiversity and ecosystems continued

### Our approach and policies

E4-2-22, E4-2-23(a-f), E4-2-24(a-d)

We have conducted a DMA aligned with ESRS E4 AR-4 and we are currently in the process of forming a knowledge base to inform a future policy for biodiversity. In the future, we can then tailor this policy to our unique identified material DIROs, as required under ESRS 2 MDR-P.

All our manufacturing operations operate under strict environmental management guidelines, which are designed to help mitigate potential impacts on biodiversity – particularly those related to water use, wastewater, pollution, emissions and waste.

To ensure the continual improvement of our facilities, we implement and maintain an environmental management system in accordance with the ISO 14001 standard. The Ardagh Group Risk team has defined and developed corporate expectations and control standards. To ensure adherence to our Environmental Policy, we maintain appropriate assurance controls, including regular compliance checks and annual management reviews.

Our disclosures in relation to E1 Climate change, E2 Pollution, E3 Water and marine resources and E5 Resource use and circular economy outline how we minimise our impacts on the environment for these topics.

[🔗 For more detail, see E1, E2, E3 and E5 \(pg. 28, 48, 53 and 63\)](#)

### Targets related to biodiversity and ecosystems

E4-4

We have not yet developed targets in relation to biodiversity. As part of our commitment to advancing nature-related disclosures, we are considering guidelines from the TNFD framework. This will serve as a foundational step in identifying appropriate biodiversity-related targets and mitigation measures, both within our direct operations and across our upstream and downstream value chains.

Furthermore, we have not assessed or disclosed how potential targets would align with the biodiversity and ecosystem DIROs identified across our operations and value chain.

Our current focus is on building an initial understanding of data across our direct operations. This will help guide the potential development of science-based and context-specific targets over time, and better prepare us to navigate evolving regulatory landscapes and stakeholder expectations. Over time, we aim to integrate biodiversity considerations into our broader sustainability strategy and risk management framework.





# ESRS E5: Resource use and circular economy

As a large-scale producer of metal and glass packaging, we are focused on maximising recycling rates, optimising material usage and managing our waste. As durable materials, metal and glass are integral to the circular economy, where materials are continuously recycled in a closed loop, maintaining their quality with minimal loss. As long as they are recycled into new products, they remain a valuable resource. We are committed to enabling the circular economy through responsible sourcing and driving demand for higher recycled content, as well as advocating for increasing global recycling rates in partnership with our trade associations. We have also implemented robust environmental management systems across all our facilities, ensuring that we are continually improving our practices.

## Resource use and circular economy IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Resource inflows, including resource use</b>					
Dependency on single or limited sources of raw materials can expose manufacturers to supply chain vulnerabilities and price volatility.	Risk	●	●		We seek to mitigate raw material supply chain risks by increasing recycled content in our products and reducing dependence on virgin materials. Through our procurement strategy, we work to diversify sourcing, build strong supplier relationships and reduce exposure to price volatility and availability constraints.
Continuously improving operational efficiency can reduce the need for resource inputs and lowers operational costs.	Opportunity		●		We invest in technologies and systems that enhance operational visibility and drive efficiency across our production lines. These improvements reduce the use of raw materials, energy and water, helping to lower costs and resource intensity. Our zero waste to landfill goals complement these efforts by minimising waste and promoting circularity.
Incorporating circular economy principles into supply chain practices can reduce resource inflow, promote recycling and extend the life of raw materials.	Opportunity	●		●	Sustainable sourcing via the procurement policy, prioritising purchasing recycled aluminium (metal) and increasing cullet usage (glass) and reducing reliance on virgin materials.
<b>Resource outflows related to products and services</b>					
Improper disposal of products by consumers creates waste, contributing to global resource outflows.	Negative impact			●	Partner with Trade Associations promoting and advocating for increasing recycling rates and education of recyclability of our products.
Promoting and offering recycling programmes for consumers can promote proper product disposal and reduce resource outflows.	Positive impact			●	Support Deposit Return Scheme (DRS), Extended Producer Responsibility (EPR) and recycling refund policies through our Trade Associations.
Transitioning to resource-efficient machinery or technologies can reduce raw material and energy consumption, thereby minimising resource outflows.	Opportunity		●		Evaluating and testing step-change projects for roll-out across our facilities to reduce our Scope 1 and 2 emissions. We continue to invest in technologies to optimise product design in order to reduce raw materials and energy consumption.

## ESRS E5: Resource use and circular economy continued

### Resource use and circular economy IRO table continued

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
Implementing wastewater and waste recycling programs can reduce resource outflows.	Opportunity		●		Ardagh Group has set 2030 water intensity reduction targets across both businesses: 20% for AMP and 26% for AGP. In addition to our water intensity, we have zero waste to landfill goal by 2025 (AMP) / 2030 (AGP).
<b>Waste</b>					
Waste from manufacturing activities can contribute to overall waste volumes if not correctly managed.	Negative impact		●		Zero-waste to landfill goal by 2025 (AMP) / 2030 (AGP).
Compliance costs and penalties may arise from non-adherence to waste management regulations.	Risk		●		We manage waste-related compliance risks through our BGreen7 standards and ISO 14001-certified environmental management systems at all facilities. These frameworks ensure proper waste handling and documentation in line with regulatory requirements, helping to reduce the risk of non-compliance, penalties and associated costs.
Offering product return or recycling schemes to customers can reduce waste from product disposal.	Opportunity			●	Support Deposit Return Scheme (DRS), Extended Producer Responsibility (EPR) and recycling refund policies through our Trade Associations.
Consumers recycling or reusing products can reduce the amount of waste going to landfill.	Positive impact			●	We fund initiatives like Every Can Counts (in partnership with our Trade Associations) and money4glass to encourage and advance recycling.

### Our approach and policies

E5-1 -14, 15(a-b)

We have embedded circular economy principles into our long-term sustainability strategy and day-to-day operational practices. While formal policy documentation continues to evolve, these principles are already reflected in our strategic roadmaps, project planning and operational decision-making across the business.

Our approach to circularity is guided by related action plans (see E5-2), which encompass investments in aluminium and cullet recycling, as well as water reuse, waste recovery and innovative design for recyclability. We are currently reviewing and updating our internal governance to reflect our commitments to circular design, waste prevention, reuse and recycling.

As part of this, we are evaluating how our circular economy principles – aligned with both our ambitions and stakeholder expectations – can be formalised into policy.

In the interim, these commitments are embedded, directly or indirectly, in the following policies:

- **Code of Conduct Policy and Environmental Policy:** These outline our environmental and ethical principles, including adherence to applicable environmental laws and regulations.
- **Responsible Procurement Policy:** Sets out an expectation that our suppliers use sustainable resources, such as aluminium with a high recycled content.



## ESRS E5: Resource use and circular economy continued

### AMP

As reported by the International Aluminium Institute, aluminium beverage cans are the world's most recycled drinks package, at 71%<sup>1</sup>. They can play a vital role in enabling a more circular economy, reducing emissions and waste. Recycling aluminium avoids 95% of the energy and emissions generated from producing virgin metal.<sup>2</sup> With a high raw material value and their relative simplicity to recycle, when collected and processed, metal beverage cans contribute to a sustainable, closed-loop system.

We continue to collaborate with our suppliers to source aluminium with a high recycled content. Promoting industry-wide recycling and the use of recycled content represents a critical step towards the achievement of our Scope 3 GHG emissions reduction targets.

Achieving global decarbonisation and circularity requires industry-wide action. To drive an increase in the recycled content in our products, we partner with both suppliers and customers. Together, we've identified several strategic initiatives to lower emissions. These include reducing material usage, lightweighting aluminium cans without compromising quality, and procuring aluminium with a lower recycled content.

### AGP

Glass is a permanent material that is 100% recyclable without any loss in quality, making it an ideal packaging solution for a circular economy. Its chemical inertness ensures product integrity, preserving the taste, safety and shelf life of the contents it holds. Glass can be recycled nearly endlessly into new containers, contributing to material efficiency and reducing environmental impact.

The increased use of cullet – recycled glass – further amplifies these benefits and supports AGP's broader climate and circularity objectives. Cullet use leads to lower energy consumption in furnaces, with an estimated 2.5% reduction in melting energy for every 10% increase in cullet used.<sup>3</sup> It also helps reduce process emissions by avoiding the need for virgin raw materials. Additionally, greater cullet use decreases waste generation and the landfill impact of post-consumer glass, reinforcing the sustainability of glass packaging throughout its lifecycle.

AGP applies circular economy principles across its operations, with a focus on increasing recycled content, enhancing product recyclability and minimising waste throughout the value chain. These practices are embedded in our business strategy, product design and operational processes, though they are not yet governed by a formal, standalone circular economy policy.

Cross-functional initiatives – led by the Sustainability, Procurement and Operations teams – guide AGP's efforts to reduce reliance on virgin materials, promote recycling and meet evolving regulatory and market expectations.

While AGP's current approach is policy-informed rather than policy-led, we believe it reflects strong alignment with circular economy principles. As circularity becomes more central to AGP's business model and stakeholder expectations grow, the company will assess the need for a formal policy framework to consolidate and guide its practices.

### Actions for circularity

E5-2-17, 18, 19

#### AMP

AMP aluminium beverage cans are inherently recyclable, and a contributor to the circular economic model. Our initiatives to increase recycling rates and recycled content are key components of our decarbonisation roadmaps. In 2024, the share of the recycled content in our aluminium beverage can reached 78%, some of the highest rates of recycled aluminium in beverage cans.

We support increasing recycling rates and raising the proportion of recycled aluminium in beverage cans. With demand outstripping production capacity across all beverage categories, our experience is that consumers are also seeking more recyclable and environmentally friendly packaging.

To promote and advocate for increased metal packaging recycling rates and recycled content, we work in partnership with industry associations. These include the Can Manufacturers Institute (CMI) in North America, Metal Packaging Europe (MPE) in Europe and Abalatas in Brazil, representing the three regions where we operate.

In 2022, we co-sponsored the inaugural Global Aluminium Can Sustainability Summit. This event assembled more than 100 leaders from global organisations in the value chain, with an agenda to operationalise the decarbonisation of aluminium produced from can sheet. Key objectives included the creation of transparent information on recycling and circularity and a plan for how to standardise the measurement of recycled content in aluminium beverage cans.

Two years later, AMP was a key participant in developing, together with industry peers and trade associations, the world's first industry aligned [Beverage Can Recycled Content \(BCRC\) methodology](#). This proposes a standard approach to calculating recycled content across the entire aluminium value chain for beverage packaging. We believe this methodology is widely being adopted and will be the industry standard going forward, creating transparency and enabling accountability.

#### AGP

We are actively addressing the material IROs related to resource use and the circularity of our products. These efforts are guided by our long-term sustainability goals and embedded in strategic roadmaps that define how we aim to drive progress.

To shape these ambitions, we regularly engage with a wide network of stakeholders – including internal teams, suppliers, industry partners, customers and leading organisations in the circular economy space. As active members of several regional trade associations, we contribute to and benefit from industry-wide initiatives that promote circularity in glass packaging.

In the United States, we work closely with the Glass Packaging Institute (GPI), which has developed A Circular Future for Glass, a 10-year roadmap targeting a 50% recycling rate nationally. In Europe, we collaborate with FEVE, the European Container Glass Federation, through its Close the Glass Loop initiative, which aims to enhance glass collection quality and achieve a 90% average collection rate across the EU.

<sup>1</sup> Source: <https://international-aluminium.org>

<sup>2</sup> Source: <https://www.aluminum.org/Recycling>

<sup>3</sup> Source: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:9884ff28-f24c-4085-8615-6192adacdf35>



## ESRS E5: Resource use and circular economy continued

In South Africa, our creation of the money4glass initiative supports both small- and large-scale collectors by providing direct compensation for recovered glass. This programme plays a key role in helping AGP meet South Africa's Extended Producer Responsibility (EPR) targets by increasing the availability of recycled content for production.

These partnerships not only support the development of more circular systems but also allow us to continuously evolve our understanding of best practices across regions.

Our commitment to circularity extends beyond compliance with evolving packaging legislation. As a global manufacturer of glass containers, we take an active role in driving sustainable practices – working cross-functionally with customers, policymakers, communities and NGOs to strengthen glass collection infrastructure and close material loops.

Additionally, through our Ardagh for Education programme, we engage younger generations by providing educational resources to schools on the benefits and challenges of glass packaging. We believe this outreach supports awareness-building around recycling and empowers students to play an active role in improving circularity in their communities.

### Targets for resource use and circularity

E5-3-21

Ardagh Group has set a voluntary target for all global production facilities to achieve or maintain zero waste to landfill by 2030, aligned with the waste hierarchy and the principles of the EU Waste Management Directive (2018/851) AGP has retained this 2030 target, while AMP has adopted a more ambitious voluntary goal of reaching zero waste to landfill by 2025. Across all operations, we focus on waste prevention, reuse and recycling to minimise the environmental impact of our operational waste.

We are closely monitoring upcoming regulatory frameworks, including the proposed EU Packaging and Packaging Waste Regulation. As these frameworks take shape, we intend to assess and potentially formalise recycled content targets that align with both legislative requirements and our customers' sustainability expectations.

### AMP

To support a more circular economy and achieve our ambitious 2025 zero waste-to-landfill target, we aim to minimise waste in all of our operational processes, adopting a reuse and recycle approach wherever possible and limited waste-to-energy incineration.

We have continued to work in partnership with trade associations to help drive up recycling rates, a key lever to increase the availability of recycled content in packaging. We work in partnership with our suppliers and customers, identifying technologies that will increase the recycled content of both can bodies and ends. We encourage our suppliers to make further progress through our procurement strategies and product carbon footprint disclosure requirements.

### AGP

AGP has set a public target to achieve zero waste to landfill across all glass manufacturing facilities by 2030. As of 2024, approximately 40% of AGP's production facilities have met this objective. Waste management programmes prioritise segregation, recycling and treatment methods that align with environmental regulations and internal standards.

We have not yet established formal, time-bound targets related to recycled content or cullet use. Nonetheless, we are actively advancing initiatives to increase both the quantity and quality of external cullet used in glass production, recognising its critical role in improving circularity outcomes.

<sup>1</sup> Source: <https://acrobat.adobe.com/id/urn:aaid:sc:EU:9884ff28-f24c-4085-8615-6192adacdf35>

Increased cullet use aligns closely with our broader climate and circularity objectives. It enables measurable benefits such as reduced energy consumption – estimated at 2.5% less melting energy for every 10% increase in cullet<sup>1</sup> – as well as lower process emissions through the substitution of virgin raw materials. Additionally, diverting post-consumer glass from landfill helps to reduce waste and support closed-loop systems.

### Tracking the effectiveness of policies and actions

E5-3-23

Robust environmental management systems in our production facilities, service centres and offices support our effectiveness. We also champion recycling efforts and reduce waste and reuse materials where possible. We track waste fractions across each facility, monthly, and record actions to reduce, reuse and recycle.

### AMP

Our ambitious target to achieve zero waste to landfill by 2025 is a testament to the embedded practices of our operations. In 2024, we made considerable progress, 83% of all our facilities met their zero waste to landfill targets versus 75% of the facilities that had met the target in the previous year.

We are committed to complying with all relevant environmental laws and regulations. Our Environmental Policy and Code of Conduct Policy set out our environmental and ethical principles and practices, with an emphasis on continuous improvement.





## ESRS E5: Resource use and circular economy continued

To support regional and facilities' waste management, we have established a cross-functional working group at Ardagh Group. They meet monthly, consulting with waste collection providers, technical engineering experts and operational teams on best practices and ways to improve performance.

### AGP

We monitor cullet usage across our operations at the global, facility, furnace and colour levels, and differentiate between internal and external cullet in its tracking. While no formal target exists, we actively pursue strategies to increase both the quantity and quality of external cullet used in glass production (see E5-2 for more information).

AGP tracks cullet usage through internal systems, including Power BI dashboards, which monitor internal and external cullet percentages for every furnace across the network. As of 2024, the average cullet usage, internal and external, across AGP operations was approximately 55%.

We comply with applicable regional requirements such as the minimum recycled content mandate in California.

### Targets on products, materials and circular product design

E5-3-24(a)

### AMP

We have set SBTi-aligned targets to reduce our Scope 3 emissions by 12.3% by 2030. To meet this goal, we intend to reduce the use of virgin aluminium, promote recycling rates and increase the use of recycled content within our products – avoiding 95% of the energy and emissions use to produce primary virgin aluminium<sup>1</sup>.

Aluminium, the main raw material we use is highly recyclable. Metals such as aluminium are elements and cannot be destroyed. Manufacturers

transform aluminium into packaging and many other product applications used in industries such as aerospace, automotive and construction. Once these product applications reach the end of their useful life, the aluminium can be recycled and used again to produce another product application in a 'virtuous circle'. This cycle can occur a nearly unlimited number of times while retaining the structural properties of the metal.

To minimise material consumption and process inflows, we continue to improve the design of our products. We work in partnership with our customers and suppliers on lightweighting and downgauging techniques, reducing the use of resources and their impacts.

### AGP

Glass is inherently durable and recyclable, and AGP's packaging is designed with these characteristics in mind. While AGP does not currently have formal targets related to circular product design, we occasionally work with customers to consider options that may support recyclability – such as labelling, decoration or closure choices. These efforts are informal, project-specific and not tracked against defined performance indicators.

### Increasing circular versus primary materials

E5-3-24(b), E5-3-24(c)

### AMP

We continue to increase the amount of recycled content in our products, supporting our SBTi Scope 3 reduction and net zero ambitions.

According to the International Aluminium Institute<sup>2</sup>, in 2022 the carbon footprint of global primary aluminium production, from mine to cast house, was 15.1 tonnes of CO<sub>2</sub>e per tonne.

In contrast, the carbon emissions for producing recycled aluminium (cradle-to-gate) was 0.52 tonnes of CO<sub>2</sub>e per tonne. As well as saving 95% of the energy needed for primary aluminium production, recycling production also saves the direct and indirect GHG emissions associated with primary production.

We have recycling rate goals for metal beverage cans in all of the regions where AMP operates:

- As a member of Metal Packaging Europe (MPE), we support our trade association partners' ambition to achieve a 100% recycling rate by 2030
- In the United States, the Can Manufacturers Institute (CMI) has published a recycling roadmap announcing a 70% recycling rate goal by 2030, 80% by 2040 and 90% by 2050
- In Brazil, the industry association Abrelatas is committed to maintaining one of the highest recycling rates globally, achieving a ~100% recycling rate for aluminium beverage cans in 2023

We achieved 78% recycled content in 2024 compared to 64% in our 2020 baseline year.

### AGP

While AGP has not yet established a formal target for circular material use rate, cullet share – including both internal and post-consumer recycled (PCR) glass – is tracked as a key performance indicator at the furnace level across our operations. In 2024, cullet comprised approximately 56% of total batch composition, with external PCR cullet accounting for an estimated 38%. This monitoring is managed through centralised dashboards and informs facility-level performance improvement efforts.

Maximising cullet content directly reduces our reliance on virgin raw materials such as silica sand, soda ash and limestone. It also contributes to lower energy use and process emissions during melting.

While formal targets are under consideration, our systematic tracking and operational prioritisation of cullet use represent a clear commitment to minimising primary material consumption and enhancing circularity performance.

AGP's collaboration with regional initiatives further reinforces its efforts to increase cullet availability and circular material use. These include the Glass Packaging Institute's 10-year recycling roadmap in the U.S., the Close the Glass Loop campaign in the EU targeting a 90% collection rate, and the money4glass programme in South Africa, which incentivises glass recovery and supports Extended Producer Responsibility compliance. These partnerships help secure a consistent supply of high-quality cullet for AGP's production processes.

### Sustainable sourcing and renewable resources

E5-3-24(d), E5-3-24(f)

We drive sustainable sourcing through Scope 3 SBTi-aligned targets.

In 2024, AMP's Scope 3 emissions accounted for 86% of its total GHG emissions, with aluminium as the primary contributor, representing 91% of those emissions. 95% of the energy and emissions associated with primary aluminium can be avoided by sourcing recycled metal.

In parallel, AGP's Scope 3 emissions are largely driven by the extraction and processing of raw materials such as silica sand, soda ash and limestone – together accounting for approximately 33% of AGP's total Scope 3 emissions. Overall, purchased raw materials represent more than 40% of total Scope 3 emissions across AGP. Our procurement strategies across both businesses prioritise suppliers that measure and reduce their environmental impacts, with a strong focus on obtaining higher recycled amounts.

<sup>1</sup> Source: <https://www.aluminum.org/Recycling>

<sup>2</sup> Source: <https://international-aluminium.org/>

## ESRS E5: Resource use and circular economy continued

### Waste management

E5-3-24(e)

Our waste strategy is primarily focused on waste reduction and prevention, in alignment with the upper tiers of the waste hierarchy. This includes efforts to minimise waste generation at the source and maximise material recovery through reuse and recycling.

#### AMP

In 2024, 83% of AMP facilities achieved our ambitious 2025 zero waste-to-landfill goal and we are on track to meet this target. Our waste management strategy addresses the following activities:

- **Recycling** – including recovery and preparation for reuse of materials
- **Disposal** – including waste-to-energy, incineration with no energy recovery, fuel blending, chemical or physical treatments and landfill

The focus across all our operations is to follow the hierarchy of waste and to use the proper treatment to minimise the environmental impact of any operational waste generated.

#### AGP

AGP's renewed zero waste to landfill strategy is guided by the principles of prevent, reuse, recycle, recover and dispose – and incorporates the full waste hierarchy when setting operational goals and performance indicators. In 2024, approximately 40% of our glass manufacturing facilities met our zero waste to landfill target. AGP's waste management programmes prioritise segregation, recycling and environmentally compliant treatment methods. In parallel, the company supports regional initiatives to increase recycling rates and strengthen waste recovery infrastructure, contributing to improved treatment outcomes across the value chain.

### Details on the nature of our targets

E5-3-25, E5-3-27

Our zero waste to landfill targets are voluntary, following guidance proposed by the Waste Management Directive 2018-851 EU. The focus across all our operations is to follow the accepted waste hierarchy<sup>1</sup> and to use effective treatments that minimise the environmental impact of any generated operational waste. We prioritise avoiding the generation of waste. We reuse or recycle any unused material with a limited amount sent to waste-to-energy recovery facilities. Our actions in order of preference, are as follows:

1. Prevent
2. Reuse
3. Recycle
4. Recover
5. Dispose

Through our zero waste to landfill target, we are driving the behavioural change needed across our operations to ensure the waste hierarchy is prioritised. We focus first on eliminating waste at its source, then on treating any remaining waste as a valuable resource by maximising reuse and recycling. Where reuse or recycling is not possible, we consider directing waste to energy recovery programmes.

### Resource inflows

E5-4-30, 31(c), E5-4-31(a-b)

#### AMP

Aluminium accounts for the highest proportion of our purchased goods and the largest proportion of our materials inflow used to produce beverage cans:

- Within our operations, the use of virgin aluminium is limited, equating in 2024 to 155,522 tonnes
- In the same year, we used 554,623 tonnes of recycled aluminium, enabling the production of cans with 78% recycled content, a key lever in our decarbonisation plan

Aluminium as a metal element is inherently recyclable and supports a more circular economy. Unlike some materials, aluminium maintains its properties during remelting and reprocessing. This viability is a key reason why **75% of all aluminium** ever produced is still in circulation today. Through our partnerships with trade associations, we continue to advocate for increasing recycling rates and the use of recycled content in beverage packaging, supporting a more sustainable use of raw materials.

Upstream to our operations, bauxite mining is essential to produce virgin aluminium but can result in negative environmental impacts. To mitigate these, the aluminium industry has increasingly focused on adopting sustainable mining practices and implementing comprehensive environmental conservation efforts. These measures, which we believe need to be reinforced and practised as widely as possible include:

- When necessary, clearing land, responsibly
- Collecting timber and seeds for revegetation
- Using mining machinery as efficiently as possible
- Ensuring equipment is regularly maintained
- Optimising transport routes to reduce emissions and other forms of pollution

The Ardagh Group Responsible Procurement Policy sets out our expectation that our suppliers use sustainable resources, and we seek partner companies who address their environmental impacts. Our production processes use no biologically derived materials. We request that our aluminium can sheet suppliers assess their environmental footprint and provide us with product carbon footprint data. We ask for this across the entire value chain – from mining to shipping rolled aluminium sheet coils for beverage can production, known as 'cradle-to-gate'. We also support sustainable practices across the entire value chain such as suppliers setting science-based emissions targets.

<sup>1</sup> Source: See Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives: <https://eur-lex.europa.eu/eli/dir/2008/98/oj/eng>

## ESRS E5: Resource use and circular economy continued

### AGP

AGP's primary resource inflows are raw materials used in the manufacture of container glass, including silica sand, soda ash, and limestone. None of these are classified as critical raw materials or rare earth elements under the EU Raw Materials Information System. In 2024, AGP sourced approximately 3.8 million tonnes of these virgin materials across its production network.

Recycled glass (cullet) constitutes a significant proportion of AGP's material inflow. In 2024, cullet accounted for approximately 56% of total batch composition, with external post-consumer recycled (PCR) cullet making up an estimated 38% of this amount. Cullet is sourced externally through commercial recyclers and municipal collection systems, as well as internally recovered from production.

These inflows are integral to AGP's circularity strategy. Increased cullet use directly contributes to reduced virgin raw material demand, energy consumption and process emissions in furnace operations. This supports AGP's broader climate and resource efficiency goals.

We work with our can sheet suppliers to ensure that all our alu process scrap and spoilage is routed back to them for recycling.

AGP has invested in facility and equipment upgrades to enhance both energy and material efficiency, including advanced furnace technology, emissions control systems and closed-loop water circuits. Resource inflows are monitored through AGP's environmental management systems to support compliance, performance tracking and continuous improvement.

### Aligning our industry on disclosing recycling content

E5-4-32, E5-5-40

#### AMP

AMP has supported the revision and standardisation of the methodology used to calculate recycled aluminium content. Our sponsorship and partnership with CMI has contributed to the BCRC measurement methodology being adopted across the industry. The methodology outlines in detail how the recycled content is captured and all AMP suppliers now use it to report recycled content. To obtain AMP's annual corporate GHG emissions inventory data, we collect the metrics from these suppliers and verify the information through a third party.

#### AGP

AGP monitors key resource inflows, including raw materials, cullet and water, through a combination of facility-level reporting, procurement systems and operational tracking tools. Cullet usage is generally recorded at the furnace level and aggregated using centralised dashboards, such as Power BI, though data quality and tracking practices may vary by facility. In some locations, cullet may be estimated based on production ratios or sourcing data where direct weighing is not feasible.

AGP does not currently rely on formal modelling techniques for its primary input data. Where assumptions are applied – for example, in estimating the post-consumer recycled (PCR) share of externally sourced cullet – they are informed by supplier disclosures, industry benchmarks and internal validation processes.

### Resource outflows

E5-5-33, 34, E5-5-36(c)

#### AMP

At AMP, we aim to use less virgin raw materials by increasing the recycled content of the beverage cans we produce. We also work with our suppliers and customers on lightweighting and downgauging efforts. All our alu process scrap and spoilage is routed back to can sheet suppliers for recycling.

We make all of our products from aluminium, a metal that can be recycled and reproduced without compromising on quality, and which supports a circular economy.

We promote and are a funding partner for end-of-life international recycling programmes such as [Every Can Counts](#), that have set out ambitious recycling rate goals to raise awareness and change behaviours to advocate for circularity across all regions we operate within. Through our trade association partners we advocate for deposit return schemes (DRS) and increasing recycling rates, post-consumer.

Our waste management strategy and zero waste to landfill commitment is evidence that we are seeking to minimise waste generation. Where feasible, we adopt a reuse and recycle approach to all waste and in 2024, 83% of all of AMP's facilities achieved zero waste to landfill.

### AGP

At AGP, we aim to reduce our reliance on virgin raw materials by maximising the use of recycled glass, or cullet, in our container production. We also collaborate with customers and suppliers to enhance product design for recyclability and to improve the quality and availability of post-consumer cullet.

All of our glass containers are made from a durable, inert material that can be indefinitely recycled without loss of quality. This makes glass uniquely suited to closed-loop recycling systems and a strong contributor to a circular economy.

In 2024, approximately 56% of the glass used in our production processes was recycled cullet, supporting reductions in energy consumption and process emissions. We actively promote glass recycling through industry platforms such as Close the Glass Loop and national initiatives like money4glass. These efforts help increase post-consumer collection and ensure more high-quality cullet is available for reuse.

Our waste management strategy reinforces this commitment. AGP has set a target to achieve zero waste to landfill across all glass manufacturing facilities by 2030. In 2024, approximately 40% of facilities had met this objective. Where feasible, we follow the waste hierarchy by prioritising reuse and recycling of operational waste and minimising disposal.

## ESRS E5: Resource use and circular economy continued

### Product durability and structural integrity

E5-5-36(a-b)

Ardagh Group produces beverage containers – aluminium for AMP and glass for AGP – that are designed to deliver high performance, preserve product quality and support circular use models.

AMP's aluminium beverage containers are lightweight, airtight and lightproof, effectively protecting beverages across a wide range of alcoholic and non-alcoholic categories. Their construction ensures an extended shelf life and prevents degradation due to oxygen or light exposure. The can body is sealed at the filling line through a process called double seaming, creating a hermetic closure that maintains carbonation and prevents contamination. While not designed for repair, the robust and permanent nature of this packaging supports high recyclability and minimal material degradation.

AGP's glass containers offer similar durability benefits. As an inert and impermeable material, glass protects the integrity, taste and shelf life of the beverages it holds. Glass is inherently durable and recyclable, and in certain markets, it is reused in multi-trip systems. While AGP does not design for disassembly or refurbishment, its containers are widely compatible with collection and recycling systems. High cullet use in production supports closed-loop recycling and reduces dependence on virgin raw materials. Biological recirculation is not applicable given the inorganic nature of glass.

Together, AMP and AGP's packaging solutions deliver durable, high-performance formats that we believe align with long-term sustainability and circular economy goals.

### Reducing waste

E5-37(a-b)

At Ardagh Group we process our waste according to the hierarchy noted in E5-3-25 on page 68:

- Recycle – includes preparation for reuse and recover
- Dispose – covers waste-to-energy, combustion and incineration with no energy recovery, fuel blending plus chemical and physical treatment
- Landfill

### Waste generated by facilities during 2024

E5-6-41, E5-5-39

AMP absolute operational waste (tonnes)	2023	2024
Sum of total waste	22,568	24,796
Sum of total waste disposed	1,533	4,258
Sum of total waste recovered	17,971	18,839
Sum of waste landfilled	3,064	1,699
Sum of total hazardous waste	8,254	10,134
Sum of radioactive waste	-	-
Sum of total non-hazardous waste	14,314	14,662

AGP absolute operational waste (tonnes)	2023	2024
Sum of total waste	65,974	60,586
Sum of total waste disposed	2,372	2,467
Sum of total waste recovered	27,567	30,628
Sum of waste landfilled	36,035	27,491
Sum of total hazardous waste	11,856	15,595
Sum of radioactive waste	-	-
Sum of total non-hazardous waste	54,118	44,991





## ESRS E5: Resource use and circular economy continued

### Waste generated by facilities during 2024 continued

E5-5-37, E5-5-39

Ardagh Group absolute operational waste (tonnes)	2023	2024
Sum of total waste	88,542	85,382
Sum of total waste disposed	3,905	6,725
Sum of total waste recovered	45,538	49,468
Sum of waste landfilled	39,099	29,190
Sum of total hazardous waste	20,110	25,729
Sum of radioactive waste	-	-
Sum of total non-hazardous waste	68,432	59,653

### Non-recycled waste

E5-5-37(d)

AMP waste ratios (%)	2023	2024
Waste recovered	80%	76%
Waste not recovered	20%	24%

AGP waste ratios (%)	2023	2024
Waste recovered	42%	51%
Waste not recovered	58%	49%

Ardagh Group waste ratios (%)	2023	2024
Waste recovered	51%	58%
Waste not recovered	49%	42%

### Sorting waste into appropriate channels

E5-5-38(a)

#### AMP

We generate primarily non-hazardous waste, a majority of which is aluminium scrap, a limited amount of non-hazardous waste is also generated from within the operations, see the AMP absolute operational waste table above. For non-hazardous content, most of the waste is by-products from processing. We return excess aluminium to the suppliers as scrap to be recycled and reused in the aluminium sheets procured for beverage can manufacture. We generate hazardous waste intermittently and this is carefully managed according to strict regulations. We track and report the quantity of both hazardous and non-hazardous waste for every facility, and we review and assess all data for accuracy, reporting annually.

#### AGP

AGP's primary waste streams include non-hazardous process waste such as internal cullet (recycled in-process), raw material losses (e.g., from weighing errors, spillage, or dust) and general packaging and production waste. Metals are another significant stream, with scrap from mould components, blanks and other equipment regularly collected for recycling. Certain facilities also generate sludge from on-site water treatment systems, which is managed according to local environmental requirements. Hazardous waste may arise periodically during furnace maintenance or equipment refurbishment, for example. Waste streams are monitored at the facility level and managed in line with AGP's zero waste to landfill strategy.

### Composition of waste generated

E5-5-38(b)

#### AMP

Aluminium scrap accounts for the majority of the waste generated within our operations. We return this to our suppliers for recycling. The remainder is process waste, consisting of:

- Filter cake
- Oils and grease
- Lacquers, solvents and cleaning chemicals
- Solid contaminants such as absorbents and filters
- Mixed municipal including household waste
- Packaging, including: secondary packaging contaminated/non-contaminated and interlayer pads that are reused or recycled
- Paper and cardboard that is sent for recycling
- Wood
- Electrical items

#### AGP

The materials present in AGP's waste include glass (primarily internal cullet), metals (from moulds, blanks and maintenance scrap), raw material residues (e.g., silica dust, soda ash, limestone fines) and packaging materials such as cardboard and plastics. Water treatment processes also generate sludge that contains trace inorganic materials. AGP does not handle or dispose of significant quantities of critical raw materials or rare earth elements. Waste composition is monitored at the facility level and informs recycling and disposal decisions in line with AGP's ZWTL goals.

## ESRS E5: Resource use and circular economy continued

### Anticipated financial effects of circularity

E5-6

#### AMP

AMP's circularity strategy centers on increasing recycled content in the aluminium used in the manufacturing of our beverage cans. Recycled aluminium is an efficient alternative to the use of new aluminium due to the high intrinsic value of the material, a comparatively low rate of material losses per cycle and the low energy and processing requirements in recycling (compared to production of virgin aluminium). We believe the potential for a high level of circularity is a particular strength of the beverage can. AMP has been successfully collaborating with suppliers for many years to increase recycled content and is looking to continue this trajectory to lessen the environmental impact of our business.

#### Risks

On an industry scale, a continued transition towards very high levels of circularity will depend on the availability of aluminium scrap to meet increasing demand. While several sources of process scrap are used in can making, a large portion of recycled materials already comes from used beverage cans. The availability of materials made from used beverage cans depends on both the installation of sufficient recycling capacity and the collection of used cans from consumers. If supply – based on these key factors – does not grow to the requirements needed to support the ongoing increase in circularity, we can anticipate risks to the further decarbonisation of beverage cans and potential financial impacts from sourcing recycled materials or from upcoming carbon pricing legislation in some markets we operate in.

#### Opportunities

Recognising the above risks, AMP is partnering with industry associations and making key investments in programs to promote recycling and enable the sufficient availability of UBCs.

- **North America:** Partnering with the Can Manufacturers Institute (CMI) to fund can capture equipment at five Material Recovery Facilities, recovering 140 million cans annually.
- **Europe:** Supporting the “Every Can Counts” campaign via Metal Packaging Europe (MPE)<sup>2</sup>.
- **Brazil:** Promoting aluminium can recycling through Abalatas, contributing to Brazil's 100% recycling rate since 2022.

AMP has invested approximately US\$1.06 million<sup>1</sup> in these programmes through our industry associations to realise the opportunity to increase the availability of UBCs.

While we recognise the limitations to our ability to impact consumer behaviour and drive regional scrap markets towards more circularity, we believe in contributing to industry-wide efforts that can reach the required scale to have a meaningful impact. We also advocate for recycling-friendly legislation in the markets we operate in.



1 MPE (US\$577,883) plus CMI (US\$257,000) plus Abalatas (US\$225,161).

2 We engage with 'Every Can Counts' in all operating regions, this is an example of how we advocate for UBCs in Europe.

#### AGP

The following outlines AGP's current understanding of how circularity-related risks and opportunities may affect its financial position over time.

Circularity plays a growing role in the resilience and efficiency of AGP's business. AGP actively monitors material linkages between circularity, cost, compliance and operational performance.

#### Opportunities

Increasing cullet use supports both environmental and economic objectives. For every 10% increase in cullet, furnace energy demand is estimated to fall by 2.5%, contributing to reduced Scope 1 and Scope 2 fuel consumption and Scope 1 process emissions. It also reduces dependency on virgin materials such as soda ash and limestone, which can mitigate exposure to price and supply volatility, as well as Scope 3 emissions.

However, financial outcomes vary by region. In some markets, external cullet may cost more than virgin raw materials, and energy savings may not fully offset procurement costs. Cullet pricing, availability and contamination levels are key variables influencing economic viability.

AGP has made targeted investments to improve long-term cullet supply and stabilise input costs, including the acquisition of SGÅ in Sweden and the expansion of money4glass in South Africa. These initiatives also support compliance with emerging regulatory frameworks.

#### Risks

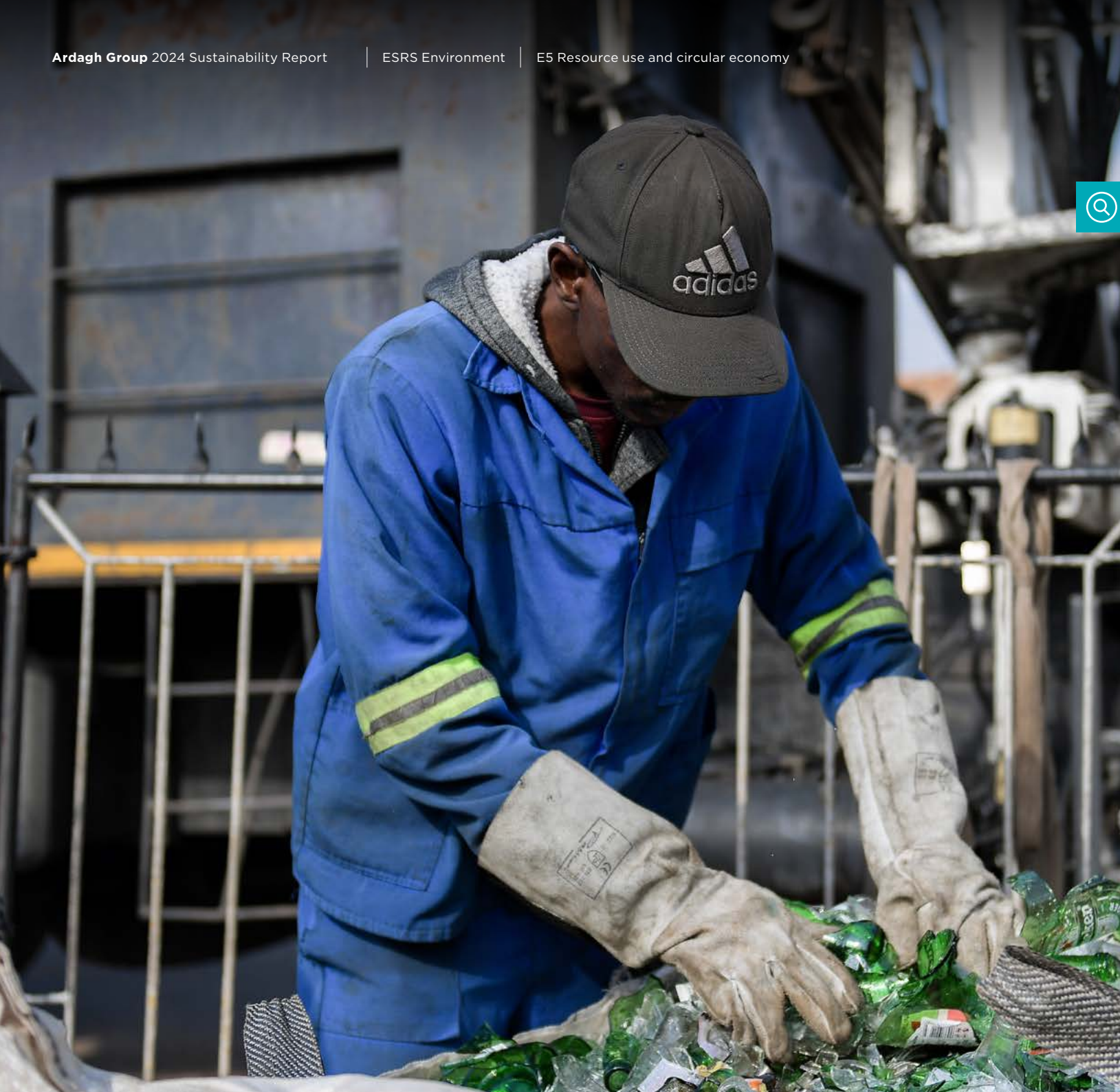
Anticipated legislation, such as the EU Packaging and Packaging Waste Regulation, may impose minimum recycled content requirements and expand Extended Producer Responsibility (EPR) obligations. These measures could increase costs related to sourcing, segregation and reporting if cullet availability or quality is inadequate.

AGP also closely monitors the evolution of EPR fee structures for glass packaging, which vary widely by market. If not appropriately calibrated to reflect glass's recyclability and environmental benefits, EPR fees risk becoming punitive and may incentivise shifts toward alternative materials. AGP advocates for fair, evidence-based fee structures that maintain material neutrality and support glass's role in a circular economy.

Additionally, infrastructure limitations, including inadequate collection or sorting systems, may constrain access to post-consumer cullet and drive up local costs.

AGP is continuing to develop its approach to evaluating and disclosing the financial implications of circularity-related risks and opportunities. This work will build on existing efforts to monitor resource dependencies, emissions and compliance costs across key markets.



**Spotlight:**

## AGP-Africa: money4glass: A Year of Impact in Glass Recycling

AGP-Africa's money4glass initiative has completed its first year, driving progress in sustainable glass recycling and supporting South Africa's Extended Producer Responsibility (EPR) goals. The programme empowers recyclers at all levels - from large operators to informal waste pickers - through a digital platform that ensures real-time, fraud-resistant payments using BanQu technology and the kasiCash cashless system, with CellBux to be added soon.

From January 2024 to December 2024, AGP-Africa's Clayville depot received 311,692 tonnes of cullet, with 67% traded via money4glass. In the Western Cape, 28% of 63,000 tonnes moved through the platform. Over R24 million in incentives was paid out, including R1,696,000 to waste pickers, whose numbers grew from 78 to 1,192. By embracing digital innovation and continuous improvement, money4glass is building a more inclusive, efficient and sustainable recycling ecosystem - supporting environmental goals while delivering real economic impact.



Learn more:

[www.money4glass.co.za](http://www.money4glass.co.za)**Image: Glass picker sorting glass for recycling**





# ESRS Social

S1 Own Workforce

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S2 Workers in the value chain

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# ESRS S1: Own workforce

At Ardagh Group we share a common purpose – we make packaging for good. We support our purpose through creating a culture shaped through our core values of inclusion, trust, teamwork and excellence. While our working environment may change, we are committed to these core values: they are the foundations of our positive working environment, where we strive to treat everyone with fairness and respect. We are also committed to fair and equitable employment practices and to operating with the highest standards of integrity and honesty. We comply with all applicable laws and regulations in all dealings within our business, with others (including customers, suppliers and public authorities) and within the communities in which we operate.

## Own workforce IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Working conditions – Working time, adequate wages, work-life balance</b>					
Offering good work-life balance, competitive wages and employment opportunities helps attract and maintain highly skilled personnel.	Positive impact		●		We actively safeguard our employees’ working conditions by implementing and maintaining comprehensive social protection measures. We conduct regular reviews of our salaries against local and global market benchmarks to ensure our compensation remains competitive and equitable across all regions we operate.
<b>Working conditions – Social dialogue, freedom of association &amp; collective bargaining</b>					
Failure to engage compliantly in collective bargaining or lack of effective workers representation could lead to strikes work stoppages and legal disputes.	Risk		●		We respect the rights of employees to freely form or join organisations of their choice to represent their interests. We engage constructively with these organisations, including in collective bargaining processes, in accordance with applicable laws and practices.
Respecting the right of workers to form work councils or join labour unions can foster open dialogue, promoting a harmonious and productive work environment.	Positive impact		●		We maintain regular and constructive engagement with employee representatives, including trade unions and Works Councils, to support open dialogue, collective bargaining and the continuous improvement of working conditions.
<b>Working conditions – Health and safety</b>					
Non-compliance with health and safety standards can result in workplace accidents, serious injuries, lost work time and regulatory fines.	Risk		●		Health & Safety underpins all our practices. We regularly review the effectiveness of BSafe! 7 / 7+ and other elements of our safety management programme with internal assessments and audits. We continuously raise awareness of health and safety within the organisation through multiple channels.
The risk of injury to its workforce can be reduced and a proactive safety culture, enhanced, by setting new industry-leading standards and following best practices in health and safety.	Opportunity		●		Health & Safety is key to all of our practices. We continuously raise awareness of health and safety, through multiple channels. We regularly review the effectiveness of BSafe! 7/7+ with internal verification audits and one element of our safety management is that plants complete self-assessments against all BSafe! Standards and create an action plan to close any non-compliances or gaps.

## S1: Own workforce continued

### Own workforce IRO table continued

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Equal treatment and opportunities for all – Gender equality and equal pay</b>					
Disregarding gender equality and equal pay laws could lead to legal penalties and reputational damage.	Risk		●		Our employment practices are built around principles of fairness and consistency. We are committed to embedding equal pay as a core principle across our organisation.
<b>Equal treatment and opportunities for all – Training and skills development</b>					
Lack of training and development opportunities could decrease employee morale and job satisfaction, lower productivity and increase turnover rates.	Risk		●		We are committed to building a highly skilled workforce through innovative learning practices and a comprehensive training programme. In 2024, we developed the Ardagh Group's Learning Academies, which provides structured development pathways within our key capability areas. Our Executive Mentoring programme pilot was launched in January 2025 matching Mentors and Mentees on a six-month programme.
<b>Equal treatment and opportunities for all – Measures against violence and harassment in the workplace</b>					
Mishandling or ignoring cases of harassment or violence can lead to legal penalties and reputational damage.	Risk		●		Our Speak Up Hotline allows for confidential reporting of discrimination or harassment. Any such reports, however received, are handled by a dedicated legal team and appropriate action is taken where required. Ardagh Group's Audit Committee receives an overview of all such cases on a quarterly basis.

## S1: Own workforce continued

### Policies related to our workforce

S1-1-20(a-c), S1-1-21, S1-1-23, S1-1-24(a-d)

We strive to create a safe, inclusive and supportive work environment. [Ardagh Group's Code of Conduct](#) is the framework for achieving this commitment and sets out the principles and expectations for what we consider to be acceptable behaviours. Our Code, along with our policies, aims to eliminate discrimination and harassment, to promote equal opportunities and advance diversity, equity and inclusion. It also seeks to protect human rights and protect individuals' health and safety. Our Code applies to everyone in our business, including all directors, officers and employees worldwide (collectively 'employees'). This also includes all entities within Ardagh Group, business partners and any joint ventures controlled by Ardagh Group. Detailed underlying policies support the high-level commitments set out in our Code – including in relation to workers' rights, health and safety, and human rights. Our Code has been approved by the Board and is reviewed and updated on a regular basis. For more detail, see the [Code of Conduct](#).

We are dedicated to fostering a positive and productive work environment that enhances the overall well-being and growth of our employees. Our Employment Policy details our commitment to social dialogue; diversity, equity and inclusion; creating a workplace free of violence and harassment; and open communication. It also details our respect for the International Labour Organization's (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.

We support employees' freedom of association and right to collective bargaining. We also back the elimination of all forms of forced or compulsory labour, the effective abolition of child labour and the elimination of discrimination regarding employment and occupation.

Our additional employee-related policies cover well-being, learning and development, recruitment, onboarding, compensation and benefits, and personal development reviews.

Safety is integral, aligning with our core values and our commitment to work safely and to prevent incidents. We are committed to complying with the laws that regulate health and safety; and manage workplace behaviours and practices that can lead to occupational injuries and illnesses. Further provisions are in our [Health & Safety Policy](#).

Our Social Sustainability Policy details our respect for the Universal Declaration of Human Rights and our commitment to complying with human rights in our business and value chain. For more details on our approach to respecting human rights see S2 Workers in the value chain.

🔗 [For more detail, see S2 \(pg. 90\)](#)

Our Speak Up and Whistleblowing Policy details the mechanisms that we have put in place to enable and encourage employees to speak up if they identify any concerns, including in relation to violations of our Code or any of our policies. For more information on approach to speaking up see G1 Business conduct.

🔗 [For more detail, see G1 \(pg. 95\)](#)

All the above-mentioned policies are approved in accordance with Ardagh Group's Policy Management Framework, which mandates that Ardagh Group-wide policies receive approval from the highest levels of management. The Code is approved by the Board, while other group-wide policies are approved by the CEO and CFO. In addition, certain policies – including those referenced in the Code – are also subject to approval by one of the Board committees.

Our Policy Management Framework sets out the basis for how Ardagh Group policies can be developed, issued, implemented and maintained. This includes how these are communicated and when training is required.

### Engaging with our workforce and representatives about impacts

S1-2-27(a-e), S1-2-28, S1-2-29

We engage with our employees throughout the year in a variety of ways. Our two-way approach ensures our employees are informed on important developments, policy updates and news from around the business; and that we also understand our employees and their viewpoints, as well as areas for improvement.

- We conduct a biannual Global Engagement Survey in partnership with a market-leading employee experience platform. Our 2024 Global Engagement Survey had a 70% participation response rate. To effectively address survey results, we hold meetings with employees at each of our offices and plants to design local action plans. We also organise leadership meetings to discuss results and design regional and global action plans. We communicate actions taken to employees and provide regular updates, and follow up on progress throughout the year. Ardagh Group's global favourable engagement rate

remained stable at 66% in 2024, having been 67% in 2022. We scored above industry average on: 1. Everyone knowing what is asked of their roles to be successful; 2. Pride in our sustainable product range; and 3. Feeling supported within roles for flexible working arrangements where available.

- Twice a year, our Global Leadership Executives broadcast company-wide townhalls, sharing key operational, business and market updates. Operating Business CEOs and Regional Business CEOs also broadcast local quarterly townhalls, with region and country-specific updates. On myArdagh, our intranet system, we distribute regular monthly employee emails, which accompany bi-weekly news updates (published in relevant languages).
- To increase communication with manufacturing employees, we also feature company news and updates on TV screens at every Ardagh Group location.
- We engage with employee representatives, including unions and Works Councils. The Ardagh Group European Works Council (EWC) has an open dialogue with our management team. The EWC and the management team have established a fair and trust-based relationship. Regular meetings include discussions on employee-related topics affecting European countries and provide a forum for exchanging views on company statements and policy drafts. At our Annual EWC Forum, participants talk directly with the management team and receive business updates.
- In the US, we have regular business updates, discussions on current trends and prioritising of our workforce needs. As outlined in our Collective Bargaining Agreements, we frequently meet with local unions to address specific issues.



## S1: Own workforce continued

### Supporting our workforce to report concerns

S1-3-32(a-e), S1-3-33, S1-3-34

Employees, contractors and any other individuals in our workforce are encouraged to speak up if they have any concerns. We are committed to ensuring that those reporting in good faith are protected from any form of retaliation or discrimination.

Employees can raise concerns, including on violations of our Code, confidentially through our established reporting channels: they can speak to their line managers, local Human Resources team, or our Legal and Compliance team. Our Speak Up Hotline is available for individuals to raise concerns anonymously. Our **Speak Up and Whistleblowing Policy** outlined in our Code, provides guidance on how to access these channels and details the procedure for how concerns are handled. We take all concerns seriously, with reports handled by qualified investigators. For more detail, see S2 Workers in the value chain.

[🔗 For more detail, see S2 \(pg. 90\)](#)

All employees receive training on reporting concerns, including on how to use the Speak Up Hotline and on our commitment to protecting reporters from retaliation or discrimination. Ardagh's Compliance Committee, reporting to the Audit Committee of the Board (Audit Committee) manages the effectiveness of Ardagh Group's Speak Up and Whistleblowing programme and policy. The Audit Committee maintains oversight of all compliance cases, including those raised via the Speak Up Hotline.

### Employee characteristics

S1-6.50(a-f)

#### Total employees by country in 2024

S1-6-50(a)

Country <sup>1</sup>	Employees
United States	5,754
Germany	3,436
South Africa	2,251
United Kingdom	2,181
Poland	1,099
Brazil	948
Netherlands	919
Sweden	481
Denmark	336
France	316
Nigeria	268
Ethiopia	198
Austria	164
Spain	154
Serbia	150
Italy	122
Ireland	104
Kenya	100

<sup>1</sup> Table excludes countries with less than 50 employees

### Employees by contract type and gender (excl. Board)

S1-6-50(b)

Headcount	Female	Male	Not declared/Other	Total
No. of permanent	2,793	15,154	13	17,960
No. of temporary	179	807	0	986
No. of non-guaranteed hours	18	53	0	71
No. of employees total	2,990	16,014	13	19,017

### Employee turnover in 2024

S1-6-50(c)

Headcount	Total
Total number of leavers	2,777
Rate of employee turnover	15%

### Methodologies and assumptions

S1-6-50(d)

As of 31 December 2024, Ardagh Group's total employee headcount was 19,017. This has been calculated on the total of all active employees as of the last day of the reporting period.

The employee turnover rate is determined by comparing the number of employees who have left the company to the average number of permanent employees during the reporting period. This rate includes all types of departures, whether voluntary or involuntary.

### Contract Types

- Permanent: Employment with no predetermined end date
- Temporary: Employment for a specific period, with a clear start and end date
- Non-guaranteed hours: Employees are employed by the undertaking without a guarantee of working hours

The workforce figures as of 31 December 2024 were formally submitted to the Finance Department. These figures have been incorporated into the Annual Report.

## S1: Own workforce continued

### Collective bargaining and social dialogue

S1-8-60(a-c), S1-8-61, S1-8-63(a-c)

We recognise that employers and employees have both mutual and potentially competing interests and recognise the importance of social dialogue and applicable collective bargaining structures. We respect and do not obstruct the right of employees to form or join their own organisations to advance their interests or to bargain collectively. If potential operational changes have major employment impacts, we provide reasonable notice to government authorities and employee representative bodies to mitigate any adverse impact as much as possible.

#### Representation metrics for 2024

- More than 65% of our employees were covered by collective bargaining agreements, highlighting our commitment to fair labour practices and employee rights.
- More than 85% of our employees were represented by a workers' representative across all regions, helping to ensure their voices are heard and their interests are advocated for within the company.

### Collective bargaining coverage

S1-8-60(b-c)

Coverage Rate	Employees – EEA (for countries with >50 employees)		Employees – Non-EEA (estimate for countries with >50 employees)	
0-19%	Ireland	0%	Serbia	0%
	Poland	0%	United Kingdom	11%
20-39%				
40-59%			Kenya	46%
60-79%			United States	64%
			South Africa	76%
80-100%	Spain	90%	Ethiopia	88%
	Germany	91%	Nigeria	90%
	Denmark	99%	Brazil	100%
	Netherlands	99%		
	Italy	100%		
	Sweden	100%		
	Austria	100%		
	France	100%		

### Global percentage of employees covered by workers' representatives

S1-8-63(a)

Coverage Rate	EEA countries	Non-EEA countries
100%	Spain	Ethiopia
	Denmark	Kenya
	Germany	Nigeria
	Ireland	South Africa
	Italy	Brazil
	Luxembourg	Switzerland
	Netherlands	United Kingdom
	Norway	Serbia
	Poland	
Sweden		
Austria		
France		
64%		US

## S1: Own workforce continued

### Diversity

S1-9-66(a-b)

Diverse talent can help to solve our biggest challenges, driving growth and our continued success. We organise our Diversity, Equity and Inclusion (DE&I) strategy through the pillars of culture, people and processes. Externally, we expect the same attitudes and standards when collaborating with customers, suppliers and in the global marketplace. We ensure alignment with the laws and regulations of every jurisdiction in which we operate.

To support our commitment to support DE&I, we continuously review and enhance our employee lifecycle processes. In 2024, our DE&I champions reviewed our talent practices. This biennial process ensures alignment of our practices with our DE&I principles and values. We compare our performance against industry data, and report regularly in accordance with our sustainability commitments.

### Recruitment

We are committed to providing equal employment opportunities for all applicants and employees. We do this fairly and consistently, free from discrimination. Factors such as ethnicity, colour, religion, gender, national origin, ancestry, age, disability, marital status, or sexual orientation are not considered as part of any Ardagh Group hiring or promotion process. All our employment decisions are based on legitimate considerations, including skills, qualifications, performance and business needs – in accordance with our Employment Policy.

### Gender distribution at top management<sup>1</sup> level 2024

S1-9-66(a)

Female		Male	
Headcount	Percentage	Headcount	Percentage
14	12%	107	88%

### Age distribution across all employees 2024

S1-9-66(b)

Age groups	Number of people	Percentage
<30	3,002	16%
30-50	9,715	51%
>50	6,300	33%

<sup>1</sup> Top management in the business is defined not more than two levels below the Board.

### Adequate wages and remuneration

S1-10, S1-16

We are dedicated to fostering a culture where equal pay is a fundamental value and we strive to reflect this in all our systems and processes. An adequate wage should enable employees to cover base expenses, such as housing, food, healthcare and education, and provide some discretionary income. We aim to operate equitable and consistent pay frameworks that reward employees fairly for their competence, capability and experience relative to the market for their role. Where countries operate a statutory minimum wage, we audit annually to ensure all employees are paid above this threshold. We regularly review our salaries against the markets in which we operate to ensure we maintain a competitive position on pay and remuneration locally and globally. In 2025, we intend to implement a new equal pay and pay transparency framework, which will enhance fairness and equity further across the business.

In 2024, our gender pay gap was 13%. This is the difference in average earnings between male and female employees across our organisation, regardless of seniority or tenure.

### Social protection

S1-11-74(a-e), S1-11-75, S1-11-76

We are committed to protecting our employees' working conditions through comprehensive social protection. This may include employee assistance programmes or support for illness, unemployment, work-related injuries, parental leave and retirement. We strive to create a positive work environment where employees can thrive. We believe this supports engagement and productivity and is key to ensuring wellbeing. Wellbeing goes beyond the workplace, and we offer programmes that are designed to support employees in activities outside the working environment.



**Spotlight:**

## AGP: Revolutionising fire safety at AGP-Knottingley

At AGP-Europe, safety innovation has taken a significant leap forward with the launch of a pioneering fire detection system at our Knottingley facility in the UK. Developed in collaboration with Fire Camera Ltd., the new IS Protect Plus System is redefining fire prevention in glass manufacturing.

Using a network of thermal imaging and HD cameras, the IS Protect Plus System continuously monitors all key areas of the IS (Individual Section) machine – including the mould and blank sides, shears, feeder and conveyor. Upon detecting specific events, the system triggers automated safety responses such as initiating safe mode, diverting glass to the basement, or activating fire suppression – helping to mitigate incidents before they escalate.

“This is the biggest advance in Health & Safety risk reduction I’ve seen in 20 years,” said Robert Fisher, Plant Director at AGP-Knottingley. “It not only protects our people but also our assets – now and in the future.”

Beyond fire detection, the system operates 24/7 to identify operational issues like jam-ups and stray glass, improving efficiency, reducing waste and preventing recurring disruptions.

The project, led by Dean Butler, Business Development Manager at AGP-Europe, was named the 2024 ‘Best EHS Improvement’ by senior leaders and EHS professionals across the Ardagh Group, standing out among over 100 global entries.

The IS Protect Plus System is now being rolled out across other AGP-UK facilities – setting a new benchmark for safety, operational excellence and sustainable innovation in the glass industry.

**Image: The IS Protect Plus system monitoring the Individual Section machine from one of several different positions (IS Machine)**



## S1: Own workforce continued

### Training and skills development

S1-13-83(a-b)

We are committed to nurturing our employees' potential and supporting their professional growth. Employee training and skills development are integral to our strategic business planning. Our approach focuses on continuous employee development through regular feedback, personalised development plans and clear goal setting.

We believe we are developing a highly skilled workforce through innovative skills development practices and a comprehensive training programme. Our learning and development strategy aims to create a competitive advantage, combining in-house expertise with external learning content.

Across our global teams we have developed strategic partnerships with training vendors, to provide innovative learning tools and build in-house teaching expertise. Our comprehensive skills development programmes focus on knowledge, skills and behaviours required and are presented in different formats, including internal and external courses, eLearning, on-the-job training/assessment and instructor-led materials, coupled with reporting dashboards that provide oversight.

All employees in all regions, except for AGP-Africa, now have access to the myLearning platform. AGP-Africa will migrate to the HR system in 2025 and will provide full access to myLearning for all employees.

This enables all employees to access learning opportunities, with the platform also serving as a central repository for training records. Our learning resources include key materials on topics such as leadership, business and people skills, sustainability and environmental health, IT, health and safety, leadership, team building, quality management topics, languages, communication skills and legal and compliance topics. In 2024, we developed the Ardagh Group Learning Academies, which house pathways in our key development areas.

We have established communication networks across our learning and people development leads globally, supported by regular learning and development meetings.

Our existing and developing leaders have leadership development programmes and digital/workshop learning activities. We also provide assessments, coaching and mentoring opportunities. Topics include unconscious bias, respectful workplace training, supervisor training, emotional intelligence and leading difficult conversations. Ardagh Group Executive Mentoring programme pilot was launched in January 2025, matching 15 mentees and mentors, paired across businesses and regions. Over a period of six months, mentors and mentees meet on a regular basis to discuss the mentee's professional development.

All employees participate in compliance training, including on our Code, Speak Up and Cyber Awareness. This accompanies targeted safety and job-specific training.

### Creating healthy and safe workplaces

S1-14-88(a)

We want all our employees to return home safely to friends and family each and every day. The prevention of physical harm and support for mental health and wellbeing are vital to our organisation and supported by policies, processes and training. It is our commitment to provide a healthy and safe workplace for all employees, visitors and contractors operating within our workplace.

We strive to prevent accidents, occupational injuries and workplace illnesses by:

- Providing the appropriate physical conditions and protections
- Implementing robust standards and procedures
- Fostering the right behaviours

Our approach to workplace health and safety is exemplified by our BSafe! 7/7+ Programme. Managed by our dedicated Environmental, Health and Safety team, the programme incorporates training and communications on safety topics including traffic safety, machine operations and work permits.

We regularly review the effectiveness of BSafe! 7/7+ with internal audits. These assess all aspects of our safety management, including policies, planning, implementation and operation and corrective actions. Timely safety reviews help encourage accountability and safety performance for all Ardagh Group facilities.

We continuously raise awareness of health and safety, the role of protective equipment and need for constant improvement in workplace and procedural safety. All our production facilities implement an accident and injury investigation system, which also covers near-misses. This examines root causes and identifies potential short- and long-term corrective actions, together with emergency action plans.

### Work-life balance

S1-14-88(a)

We take a holistic approach to supporting our employees in the conviction that their health and wellbeing is fundamental to the sustainability of our business. We support a work-life balance by offering hybrid working, which provides flexibility for employees in eligible roles. To encourage well-being and productivity, we also seek to ensure reasonable working hours for all employees in line with local guidelines.

### Employees entitled to family related leave and percentage of employees that took family-related leave

S1-15-93(a-b)

We are dedicated to fostering a supportive and balanced work environment, with 95% of our workforce entitled to family-related leave. In 2024, 3% and 9% of our female and male workforce, respectively, took advantage of this benefit.

### Rewarding employees

We know the tremendous value our people bring to their work. We seek a culture that is fair and equal, and we reflect this in how we reward our teams for their efforts. We want our people to feel rewarded fairly for their talent and hard work. To provide consistency in our approach to recognition, we have employee recognition and reward global guidelines, and adapt the details to local context.

### Employees participating in regular performance and career development reviews

S1-13-83(a)

Female			Male		
Total Headcount	Participants	Participation Rate	Total Headcount	Participants	Participation Rate
2,419	1,623	67%	13,696	8,216	60%

## S1: Own workforce continued

Remuneration reflects each employee's competence, capability and experience, relative to the market for their role. These principles enable us to attract and retain high-quality, talented employees who are motivated to develop and grow their careers within the business.

We have variable remuneration incentive schemes, reflecting our core values, and employees are rewarded for delivering against key performance indicators relevant to their role, such as productivity, efficiency, quality and financial performance.

### Benefits

We offer comprehensive benefits programmes tailored to each employee's position, location and organisational level. These are designed to present a compelling employment package for all employees, wherever they work. Benefits include pension and retirement support or health and wellbeing provisions, available to all our employees.

Conditions of work, wages and other forms of remuneration comply with national laws and regulations. They are consistent with applicable International Labour Organization (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.

### Protecting human rights

S1-17-103(a-d), S1-17-104(a-b)

Ardagh Group is committed to ensuring that there are no human rights abuses in our business. In addition to our policies, we have implemented a risk-based management system. This helps us to identify and manage potential social, ethical and environmental risks across our business and supply chain, including the risks of child labour and forced labour.

We have various procedures and controls to ensure that there are no human rights abuses. For child labour, these include age verification processes for potential employees before commencing work at Ardagh Group. In 2024, we conducted a human rights risk assessment at each of our operating locations, with all risks rated 'low'.

We encourage all employees to report concerns, including those related to human rights, and all such reports are investigated. Where there are any potential negative impacts, we consider additional mitigation measures. In addition to encouraging reporting, we have also adopted an internal procedure on reporting child labour and modern slavery. This procedure includes detail on indicators for modern slavery and how to report and remediate issues.

Certain employees within our business, including those in our HR team, are required to undertake annual online training on relevant human rights-related policies, how to recognise the signs of human rights abuses and the steps to take if they encounter them. Ardagh Group publishes all relevant actions in an annual Modern Slavery Statement.



### Discrimination (including harassment)

S1-17-103(a-c)

The Audit Committee receives quarterly overviews of all compliance cases, including those related to discrimination, including harassment. We had the following work-related incidents or complaints in 2024:

- Total incidents related to reported discrimination and harassment, which were substantiated – AMP: 9 and AGP: 9
- Total complaints relating to discrimination and harassment, including those reported through the Speak Up Hotline (not including the incidents mentioned above (i.e. cases there were not substantiated or uninvestigable due to lack of information) – AMP: 51 and AGP: 32
- Total fines, penalties and compensation for damages because of incidences disclosed above – 0

### Human rights incidents

S1-17-103(a-b)

- Severe human rights incidents – 0. We did not identify any severe human rights incidents connected to our workforce in 2024, nor did we receive any fines, penalties or need to pay compensation for damages for any such incidents.





**Spotlight:**

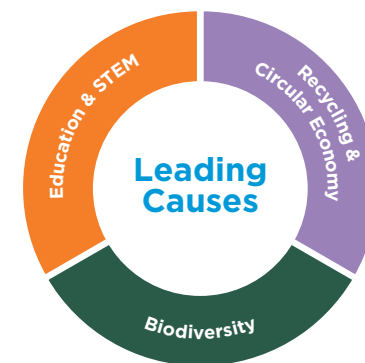
# Ardagh in the community

In 2024, to bring all of our community efforts under one umbrella, Ardagh Group launched its Ardagh in the Community strategy, focusing the majority of our outreach around three key pillars: Education & STEM, Recycling & Circular Economy and Biodiversity. Our flagship programme, Ardagh for Education, leads efforts in the education space, creating new opportunities for collaboration across all three themes. As part of our general volunteering goals, we aim to deliver at least one meaningful Community Involvement Project (CIP) at each Ardagh Group location annually.

This year, we took a regional approach – expanding Ardagh for Education partnerships in Brazil and South Africa, with a focus on educational impact. In North America, AMP and AGP collaborated with Project Lead the Way to develop engaging, hands-on recycling workshops. Across Europe, colleagues explored Biodiversity through activities ranging from tree planting to building community gardens.

Together, more than 1,350 Ardagh Group colleagues contributed ~12,854 volunteer hours – equivalent to 17.5 months – demonstrating our strong global commitment to the communities we serve.

**Areas of focus**



**Volunteer hours**

**~12,854**

**Colleagues volunteering**

**~1,350**

Image: Ardagh Group shot of the students from the local Enzesfeld Volksschule after planting trees at the local playground



**Spotlight:** Ardagh in the community continued

# Recycling & Circular Economy

## AMP-North America – Fairfield Recycling Workshop & Plant tour



Plants across AMP-North America took on the challenge of delivering the new hands-on recycling workshops co-created with Project Lead The Way (PLTW) with enthusiasm, deepening their connections with the local community. In-school workshops were followed up with plant tours for students from the local school.



Our Fairfield facility hosted students from a local school for a plant tour and discussion about careers in manufacturing



Our AMP Fairfield team visited a local school to deliver a hands-on workshop and talk about the importance of recycling for National Recycling Day

## AGP-North America – Port Allegany recycling workshop



Our Port Allegany facility enjoyed hosting first grade classes for interactive workshops on glass reuse and recycling, giving students a unique, hands-on look at the materials involved in glass production.



Port Allegany team member delivering hands-on workshops to the local primary school



**Spotlight:** Ardagh in the community continued

# Leading Cause – Education & STEM

## AMP-South America: Jacarei brings a splash of colour to local school



The Professor Luiz Carlos Maiola Covre Municipal School, in Jacarei (SP), got a new lease of life with colourful makeover. The initiative is the result of a partnership between PPG, AMP-South America with support from city hall and the department of education and over 150 volunteers from these partners.



Volunteers painting exterior of school



Volunteers leave colourful signature to commemorate this community action

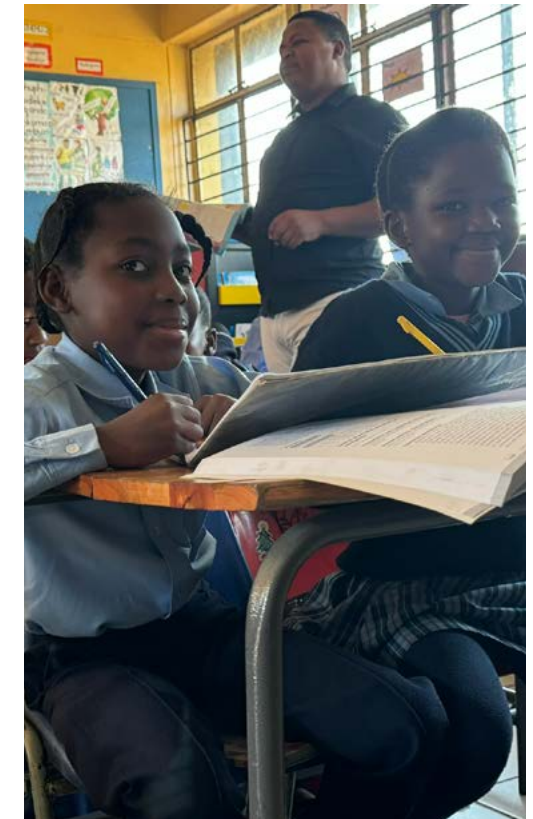
## AGP-Africa: Supporting students and teachers



Working with PROTEC in South Africa, the Ardagh for Education team has launched the programme in 16 schools, benefiting 388 teachers and 17,113 students. This is an early step toward its 10-year goal of reaching 1,100+ teachers and over 300,000 students in grades 4-12. 'Ardagh Mobile Labs' support under-resourced schools by providing science and maths equipment, leading to notable improvements in student performance across participating schools.



Facilitator taking learners through an experiment



Grade 5 learners in mathematics class



**Spotlight:** Ardagh in the community continued

## Leading Cause – Biodiversity

### AMP-Europe: Enzesfeld celebrates Earth Day

AMP

AMP Enzesfeld marked International Earth Day 2024 by partnering with the municipality of Enzesfeld-Lindabrunn and local elementary school children to donate and plant five Sophora pollinator friendly japonica trees at a nearby playground. Eventually reaching 30 metres in height, these trees will provide much-needed summer shade. The event, attended by the mayor and municipal representatives, reflects our commitment to supporting our community and implementing nature-based solutions.



Volunteer planting a tree in the playground

### AGP-Europe: Doncaster co-creates a sensory garden

AGP

AGP-Doncaster partnered with Denton Nickels and Hatfield Woodhouse Primary School to create a sensory garden for children with special educational needs. Over 40 volunteers transformed an overgrown space into a biodiverse learning area featuring bug houses, a restored pond and a fire pit. The garden now supports outdoor lessons, a gardening club, and a forest school to boost children's confidence and connection to nature.



The Doncaster team planning the sensory garden





### Spotlight:

## Ardagh for Education

### We are inspiring future generations

As a major component of our social pillar, the mission of Ardagh for Education is to give back to the communities we operate in through high-quality Science, Technology, Engineering and Math (STEM) education. We aim to upskill teachers and provide students with hands-on, engaging STEM learning experiences to enhance their technical abilities and equip students with in-demand, 21st century skills. Students are exposed to a variety of exciting STEM activities, such as robotics, coding and IT, engineering design, climate change, recycling, advanced manufacturing, and many others.

Additionally, our local employees are engaging with these schools, building relationships with teachers and students, volunteering time in classrooms and highlighting career opportunities in STEM and with Ardagh Group. Some of these students have also joined Ardagh Group's internship and apprentice programmes, and this will continue to be an important priority to invest in the next generation of talent in our local communities. This initiative is creating a more diverse STEM pipeline, reaching often overlooked populations, and providing opportunities to young people.



More information on the Ardagh for Education programme can be found at:

[ArdaghGroup.com/ardagh-for-education/](https://ArdaghGroup.com/ardagh-for-education/)

Image: Guateng, South Africa

**Spotlight:** Ardagh for education continued

**Ardagh for Education Goals**

Country	Beneficiaries (students)	Duration (years)	Teacher Training		Partner
			Teachers	Schools	
United States	500,000	10	5,000	2,000	PLTW
Germany	200,000	10	1,000	300	Wissensfabrik
Brazil	200,000	10	2,500	200	Brazilian Social Service for Industry (SESI)
South Africa	300,000	10	1,100	200	Programme for Technological Careers (PROTEC)



**Image: Jacarei, Brazil**  
Teachers participating in training in our Jacarei, Brazil community

**Results & impact to date:**

**US\$13m** Money committed  
**1,000+** Ardagh Group colleagues volunteered with local schools

**675+** Schools  
**90%** of participating students indicating improvements in problem-solving, communication and critical thinking through this programme

**44** Ardagh Group communities worldwide  
**95%** of participating students who are more aware of STEM career paths

**2,200+** Teachers upskilled in STEM  
**47%** of participating students who are female

**210k+** Students reached with hands-on STEM learning  
**70%** of participating students who are underserved

# ESRS S2: Workers in the value chain

Responsible labour practices are essential to our sustainability strategy and are a fundamental part of our decision-making process. We prioritise the wellbeing of all workers in our values, as well as respecting their human rights, which helps to increase our sustainable impact, reduce risk and drive our long-term performance.

## Workers in the value chain IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Working conditions - Working time and adequate wages</b>					
Suppliers not adhering to working time laws and regulations could face regulatory action, impacting supply chain reliability.	Risk	●	●		We expect and require our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence and risk assessments we look to ensure that these values are being upheld in our supply chain.
<b>Working conditions - Social dialogue, freedom of association &amp; collective bargaining</b>					
Suppliers with poor social dialogue practices could face increased employee turnover, impacting supply chain reliability.	Risk	●	●		We expect and require our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence and risk assessments we look to ensure that these values are being upheld in our supply chain.
<b>Working conditions - Health and safety</b>					
Workplace accidents or health issues among suppliers could have negative impacts on individuals and impact supply chain reliability.	Risk	●	●		We expect and require our suppliers to meet and uphold human rights within their operations. Through contractual measures, due diligence and risk assessments we look to ensure that these values are being upheld in our supply chain.



## ESRS S2: Workers in the value chain continued

### Policies related to value chain workers

S2-1-16, S2-1-17(a-c), S2-1-18, S2-1-19

We are committed to protecting human rights throughout our business and supply chain. Our [Responsible Procurement Policy](#), [Social Sustainability Policy](#) and [Modern Slavery statement](#) support this commitment. We require our suppliers to respect and enforce our standards, comply with all applicable laws and regulations, and take appropriate steps to ensure that there are no human rights violations in their businesses.

#### Code of Conduct

Our Code and all its accompanying policies, applies to all our directors, officers and employees, as well as all controlled joint ventures. We expect our business partners to adhere to the principles and values in our Code.

Our commitments to respecting human rights within our own workforce are detailed in ESRS S1. In relation to our supply chain, the Code sets out our respect for the [Universal Declaration of Human Rights](#) and our commitment to adhering to and supporting human rights. We expect our suppliers to comply with all relevant human rights-related laws, including those associated with safe working conditions, prevention of human exploitation (including forced labour, child labour and human trafficking), discrimination and environmental management.

#### Responsible Procurement Policy

Our Responsible Procurement Policy sets out our approach to managing topics, including human rights, across our value chain. It outlines standards we require of our suppliers, including social, ethical and environmental matters, human rights (covering prevention of human exploitation including human trafficking, forced labour and child labour, rights to collective bargaining, fair working conditions, discrimination and the promotion or diversity, and harassment and violence), and health and safety.

Our requirements are based predominately on the [Ethical Trading Initiative \(ETI\) Base Code Principles](#), which were founded on the conventions of the International Labour Organisation. Our Responsible Procurement Policy is aligned with the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#).

It also details how we monitor adherence to our requirements and the consequences facing a supplier should they not adhere to all requirements, such as 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. We have established internal procedures for supplier human rights and environmental rights due diligence. We regularly review our Responsible Procurement Policy and its associated procedures.

#### Social Sustainability Policy

Our Social Sustainability Policy builds on our commitments to complying with human rights in our business and supply chain. It details our respect for the Universal Declaration of Human Rights, how we identify and address potential human rights issues in our supply chain, and promotes social responsibility in our value chain.

#### Processes for engaging with value chain workers about impacts

S2-2-22(a-e), S2-2-23, S2-2-24

As part of our responsible procurement risk assessment cycle, we engage with suppliers throughout the procurement process about actual and potential impacts on value chain workers. This engagement forms part of our supplier risk assessment with our supplier's sales representatives/responsible supply chain managers. Our initial supplier risk assessments include human rights, health and safety and environmental rights-related risks. Selected suppliers may be subject to

more in-depth risk assessments. Following onboarding, we may carry out further supplier risk assessments for selected suppliers, depending on the supplier's risk profile.

We regularly assess the effectiveness of our supplier engagement and develop risk mitigation measures if needed. Suppliers may also be required to undergo ethical audits, which are conducted by a third party.

We may become aware of negative impacts on value chain workers via our risk assessment process, news monitoring, or concerns raised directly with us, as well as by reviewing supplier due diligence to identify any impacts. Where necessary, we take appropriate preventative measures.

We develop and review our process for engaging with value chain workers on actual and potential impacts on an ongoing basis. For example, in 2024 we reviewed our criteria for identifying selected suppliers to ensure we have an appropriate focus on value chain workers that may be subject to actual or potential impacts.

Our Sustainable Supply Chain Manager works with our Procurement team to conduct supplier engagement. Ultimate responsibility for these activities sits with our Chief Procurement Officers and our Group Compliance Director.



## ESRS S2: Workers in the value chain continued

### Processes to remediate negative impacts and channels for value chain workers to raise concerns

S2-3-27(a-d), S2-3-28, S2-3-29

If we identify any material negative impact on value chain workers, we seek to adopt appropriate remedies and interact with our direct suppliers to implement improvement plans or identify corrective actions. We then work with suppliers to review their effectiveness on an ongoing basis. To gain insights into potential negative impacts and understand appropriate remedies at an industry level, AMP engages with the aluminium associations across the regions it operates within, and AGP with the Glass Packaging Institute and FEVE.

Our grievance mechanisms are detailed in our Responsible Procurement Policy and on our website. Any Ardagh Group employee, value chain worker, supplier or indirect supplier who becomes aware of or suspects any concerns or violations of human rights, environmental rights or other ethical or compliance matters, may raise concerns via our Speak Up Hotline or by contacting our Legal & Compliance team.

#### Our Speak Up and Whistleblowing Policy

Our Speak Up Hotline, operated by an independent third party, gives individuals the opportunity to report concerns in a confidential, secure and effective manner verbally or in writing. Where permitted by local law, concerns may be reported anonymously. Our internal Procedure on Reporting Child Labour and Modern Slavery details signs of modern slavery (including forced labour and human trafficking) and steps to take if it is discovered. For more see S2-4 or refer to disclosures in G1-1.

🔗 For more detail, see G1-1 (pg. 98)

We are committed to protecting reporters from retaliation as part of our Code and Speak Up and Whistleblowing Policy. Reported concerns are tracked and monitored, and all cases are reported to our Audit Committee on a quarterly basis.

### Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

S2-4-32(a-d), S2-4-33(a-c), S2-4-34(a-b), S2-4-36, S2-4-38

We require our suppliers to comply with our Code and Responsible Procurement Policy. For more information see S2-1. We engage with suppliers throughout our annual risk assessment cycle, analysing risk to identify potential negative impacts in our value chain, such as:

- forced and child labour
- fair working conditions
- workers' rights
- health and safety

For all areas related to human rights we have set out clear expectations to our direct suppliers. The selected suppliers who are asked to participate in detailed risk assessments, are required to answer questions about their practices in these areas and mitigation measures in place to address potential negative impacts. Examples of our approach are set out in the table above.

### Supplier risk assessment overview

Risk area	Example questions asked of selected suppliers
Child labour	Suppliers are asked whether they confirm the age of workers as part of their hiring process. If the suppliers hire workers below the age of 18, they are asked to identify the measures taken to ensure their protection.
Fair working conditions	Suppliers are asked to confirm that they pay wages in line with the statutory or industry minimum wage.
Workers' rights	Suppliers are asked if workers are organised in a union, and whether workers are offered bonuses or other benefits if they are not members of a union.
Health and safety	Suppliers are asked about systems to track working time to ensure appropriate breaks and rest periods and asked about their systems for health and safety management.

### Managing risk in our supply chain

We continuously work to extend our understanding of our supply chain through mapping activities and engage with suppliers by providing feedback, clarifying or requesting further information and implementing improvement plans or corrective actions where applicable. We consider multiple factors when managing risk, including industry, geography and the risk of human rights abuses, and information from multiple sources (e.g. supplier questionnaires, independent risk indices and online media sources). Our procurement team carries out these activities, overseen by the Chief Procurement Officers, to ensure we balance human rights with business continuity.

### Detailed supplier risk assessments

By collaborating with suppliers, we aim to ensure appropriate measures are in place to prevent or mitigate against key risks. Selected suppliers may be asked to participate in our detailed risk assessments about their practices and mitigation measures that address potential negative impacts: this might include an on-site ethical audit, either conducted by Ardagh Group representatives or by a third party. Our ethical audits cover social (including modern slavery), environmental and health and safety matters, and typically include a facility tour, records review and worker interviews. We prefer third-party audits for suppliers within higher-risk geographies and do not conduct unannounced audits.

## ESRS S2: Workers in the value chain continued

We focus on suppliers where we can exert greatest influence, as well as those suppliers which have a higher-risk exposure (from a social and ethical perspective). Our approach is regularly re-evaluated, at least every two years. Assessment outcomes are shared with relevant suppliers, and where necessary risk mitigation measures are agreed.

### Human rights breaches

If we become aware of heightened potential of human rights breaches, we may introduce additional mitigation measures. For example, as human rights risks are generally higher in Brazil and Africa, we have introduced additional mitigation measures when dealing with suppliers in these jurisdictions, including regular supplier communications on ethical employment practices and worker safety.

We also apply additional mitigation measures, such as enhanced due diligence, when sourcing cobalt – due to the increased risks associated with the operation of illegal mines, unacceptable working conditions and damage to the environment.

All suppliers to AGP-Africa must confirm and certify compliance with our Code before entering a contract with AGP.

In 2024, we became aware of potential negative impacts related to human rights, environment and health and safety topics at two suppliers in our value chain – one direct supplier and one indirect supplier. We worked with both suppliers to implement an action plan to remedy the impact and prevent future recurrence, and we continue to monitor those suppliers to ensure the measures are effective. We did not cause or contribute to these incidents, and did not receive any fines, penalties or need to pay compensation for damages for any such incidents.

### Human rights governance and training

We review our progress and effectiveness in combatting slavery and human trafficking on an annual basis, prioritising actions with the greatest risk and opportunities to our supply chain workers.

Our Sustainability Committee oversees human rights at Ardagh Group, and a Sustainable Supply Chain Manager is responsible for monitoring adherence to our Responsible Procurement Policy. We use a third-party tool to manage and monitor suppliers' human rights risks, with features to record preventive and corrective actions and gather news related to suppliers. In addition, we publish annual reports on our activities, such as our Modern Slavery Statement.

Our procurement team undertakes mandatory annual online training regarding our policies, on recognising signs of modern slavery and what steps to take if they encounter it. We have developed and implemented similar training for our Human Resources team and review its effectiveness every year.

### Objectives related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

S2-5-39(a-c), S2-5-42(a-c)

The following objectives for 2025 have been approved by our Sustainability Committee:

- Conduct social and environmental due diligence for 100% of global strategic suppliers
- Conduct training for 100% of category managers on prevention on human exploitation

Every year we complete the EcoVadis questionnaire, which assesses the quality of our sustainability management system. In 2024, we achieved Gold, placing us in the top 5% of companies across the areas of environment, labour and human rights, ethics and sustainable procurement.

By conducting social and environmental due diligence on our global strategic suppliers, we measure their efforts to prevent material negative impacts on the workers in our supply chain. It also helps us to understand any gaps that we can address through capacity building

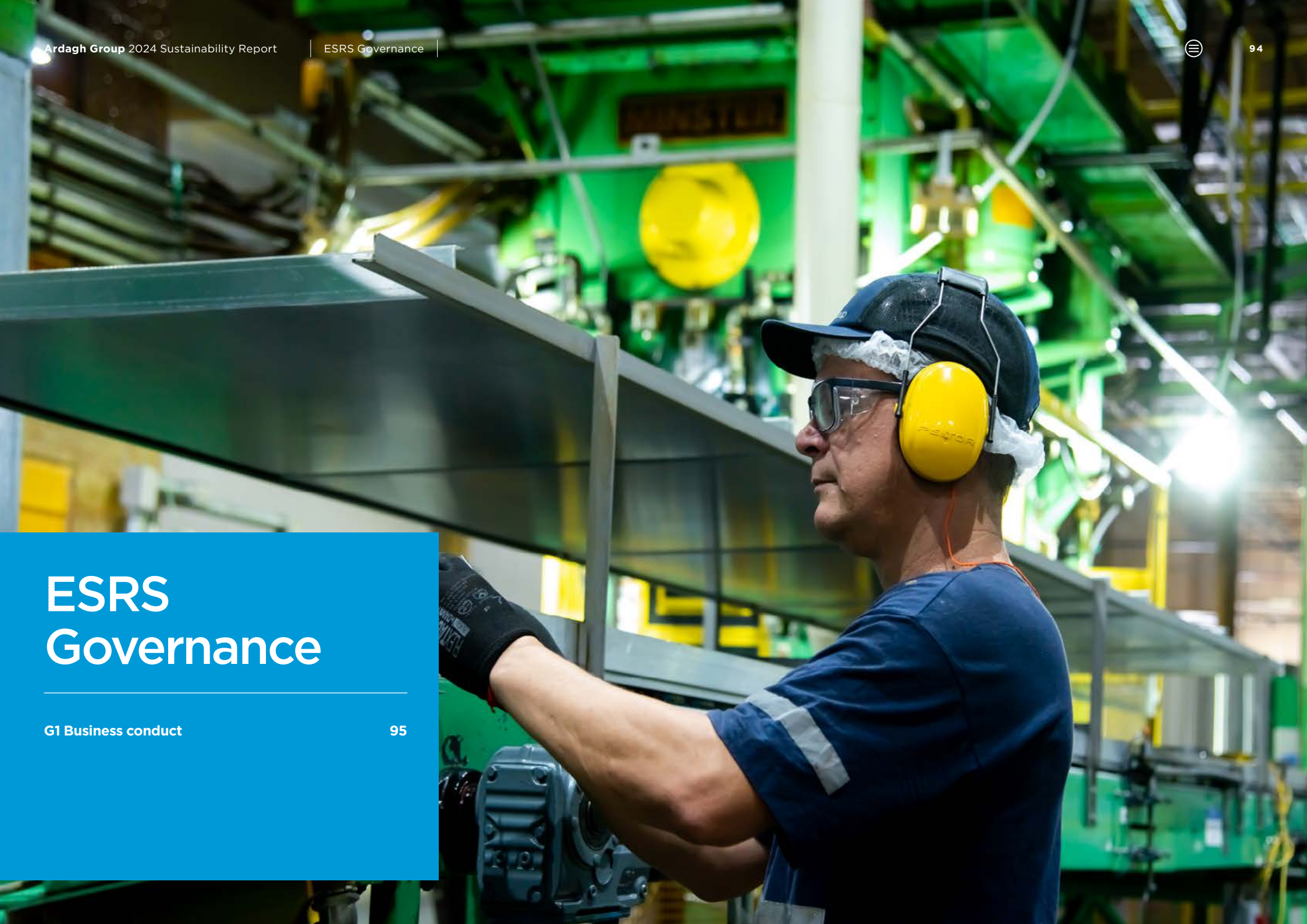
or collaborating with suppliers or the industry, to manage material risks and opportunities.

Our training target measures the number of category managers equipped with human rights-related knowledge and their capability to react and respond if they encounter any material negative impacts on workers in our supply chain. We have not engaged directly with workers in the value chain to set these targets.

AMP also aims to achieve Aluminium Stewardship Initiative (ASI) Chain of Custody certification.







# ESRS Governance

G1 Business conduct

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# ESRS G1: Business conduct

We are committed to operating with the highest standards of integrity and honesty and to complying with all applicable laws and regulations. Our Board has adopted a Code of Conduct, which is the framework for achieving these commitments. It sets out principles and clear expectations about what we consider acceptable behaviours. Our Code is based around our core values of inclusion, trust, teamwork and excellence, and applies to everyone in our business. Our Chair and CEO set a clear tone from the top, promoting the Code and everything we stand for across Ardagh Group.

[For more on our business conduct policies and corporate culture, see G1-1 \(pg. 97\)](#)

## Business conduct IRO table

ESRS 2 SBM-3-48b

Description of Material IRO	IRO category	Value chain location			How we manage the IRO
		U	O	D	
<b>Corporate culture</b>					
Building trust among employees can lead to a more positive and productive work environment, increased collaboration and innovation.	Positive impact		●		We proactively engage with our employees to create a more productive work environment through leadership training. To effectively address the employee engagement survey results, we hold meetings with employees at each location to discuss the results and design local action plans. We also organise leadership meetings to discuss the results and design action plans at regional and global levels, which we track over time. We communicate the actions taken based on feedback to employees and provide regular updates.
<b>Protection of whistle-blowers</b>					
A robust whistle-blower policy can prevent mismanagement and unethical behaviour within own operations and the supply chain.	Positive impact	●	●	●	Employees, contractors and any other individuals in our workforce are encouraged to speak up if they have any concerns. They can speak to their line managers or local Human Resources team – often best-placed to support concerns. We have also established a Speak Up Hotline, where individuals can raise concerns anonymously. An independent third party operates the channel, enabling stakeholders to raise concerns in a confidential, secure and effective manner.
<b>Management of relationship with suppliers</b>					
Customers may be lost if they learn that a manufacturer's suppliers are engaging in unethical practices and if controls are identified as insufficient.	Risk	●	●	●	Together with the contractual obligations requiring suppliers to follow ethical practices, Ardagh Group has established and implemented an ethical due diligence and risk assessments procedures for its supply chain.

## ESRS G1: Business conduct continued

### The role of administrative, management and supervisory bodies

GOV-1-21(a-e), GOV-1-22(a-d), GOV-1-23(a-b), G1-5(a-b)

As of year-end 2024, the Board had nine members, three of whom were non-executive directors (i.e., directors that are not employed by Ardagh Group or any of our affiliates). All three of our non-executive directors were independent (representing 33% of our Board) according to the corporate governance standards of the New York Stock Exchange.

There have been changes to our Board in 2025. As of 30 June 2025, our Board had eight members. The number of non-executive directors and independent directors remained unchanged from year-end.

Pursuant to our [articles of association](#), the Board must have at least three and no more than 15 directors. The holders of our common shares have the right to elect the Board members at a general meeting of shareholders by a simple majority of the votes validly cast. The existing directors have the right to appoint persons to fill vacancies on the Board, and such persons may hold office until the next following annual general meeting of shareholders. None of our Board members are elected by employees.

Biographical information on each Board member, including relevant experience in sectors, products and geographic locations, is presented in our [2024 Annual Report](#). Currently, all our Board members are male.

Ardagh Group S.A. is a Luxembourg public limited liability company (Société Anonyme) and is subject to the Luxembourg law of 10 August 1915 pertaining to commercial companies, as amended from time to time. Ardagh Group's business is managed and conducted by (or under the direction of) our Board, which is Ardagh Group's ultimate decision-making body (except for those matters reserved to or shared with the shareholders). The Board's responsibilities are set out in Ardagh Group S.A.'s articles of association.

Our executive officers are appointed by the Board to serve in their roles. Each executive officer is appointed for such term as may be prescribed by the Board or until a successor has been chosen and qualified or until such officer's death, resignation or removal.

The Board has five standing committees (the Committees): the Audit Committee, the Compensation Committee, the Nomination and Governance Committee, the Sustainability Committee and the Finance Committee. The members of each Committee are appointed by the Board and serve until their successors are elected and qualified (unless they are removed or they resign). Each Committee reports to the Board as it deems appropriate, and as the Board may request. The composition, duties and responsibilities of the five standing Committees is presented in our 2024 Annual Report. In the future, our Board may establish other committees, as it deems appropriate, to assist it with its responsibilities.

Each Committee has its own charter. The Committee charters, as well as Ardagh Group S.A.'s articles of association, are available under the "[Governance](#)" section of the Ardagh Group website. In addition, the Board has adopted corporate governance guidelines that serve as a flexible framework within which the Board and its Committees operate.

### Skills and expertise to oversee sustainability matters

The Nomination and Governance Committee selects and recommends nominees for election by the shareholders or appointment to the Board. Among other matters, it reviews our Board member composition for characteristics such as independence, knowledge, skills, experience and diversity.

In addition, the Board and certain Committees (including the Sustainability Committee) perform an annual self-evaluation focusing on the composition and competencies of, and results achieved by, the Board and such Committees.

We believe the composition of the Board, which includes a broad spread of nationalities, backgrounds and expertise, provides the breadth and depth of skills, knowledge and experience that are required to effectively lead an internationally diverse business with interests spanning four continents. Biographical information on each Board director is in our [2024 Annual Report](#). In addition, the Board may draw on external expert advice.

### Role and expertise related to business conduct

The Board and the Audit Committee play a key role in monitoring, evaluating and strengthening Ardagh Group's business conduct and corporate culture.

The Board has adopted our Code, which establishes the standards of ethical conduct applicable to all our directors, officers and employees. Any amendments to the Code must be approved by the Board.

The [Audit Committee](#) is responsible for, among other matters, our internal control activities and compliance with legal and regulatory requirements. This includes taking actions necessary to enforce the Code, including establishing procedures to consider alleged violations of such codes, reporting and disclosure of such violations (including reviewing quarterly reports prepared by the compliance committee) and any waivers granted by the Board under such codes.

The Audit Committee has established a compliance committee to drive the implementation of the Code and ensure that Ardagh Group has appropriate policies to address compliance risks. The compliance committee includes representatives from across the business and is responsible for reviewing compliance violations and reporting these to the Audit Committee.

The Ardagh Group Compliance Director, who is part of the Ardagh Group Legal team and reports directly to the Chief Legal Officer, manages topics related to the Code, including anti-corruption, prevention of bribery and protection of whistleblowers. The Audit Committee receives quarterly updates on material fraud incidents, and compliance cases (including those related to business conduct) including any submissions to our Speak Up Hotline.



## ESRS G1: Business conduct continued

### Sustainability matters addressed by the administrative and supervisory bodies

GOV-2-26(a-c)

Information related to sustainability matters is provided to the Sustainability Committee at least four times a year, and to the full Board on at least an annual basis, see ESRS 2 GOV-1. These matters include sustainability-related regulatory changes and evaluation of the impacts, risks and opportunities related to our sustainability strategy and major corporate actions.

Members of management, including the Chief Executive Officer of AGP, the Chief Sustainability Officer AGP and the Chief Sustainability, Strategy & Transformation Officer AMP, attend the Sustainability Committee meetings.

Ardagh Group's Sustainability team engages with a diverse range of stakeholders, including employees, customers and industry organisations to understand their sustainability priorities and expectations, to inform our decision-making processes. Management (and other members of the Sustainability team) provide regular updates to the Sustainability Committee regarding significant sustainability issues that could impact our business and stakeholders, as well as updates on the implementation of our sustainability strategy. In addition, sustainability topics are annually discussed with the full Board as part of management's update on our ESG strategy, performance and reporting.

In accordance with its charter, the Sustainability Committee periodically reviews AMP's and AGP's performance against their publicly disclosed sustainability targets. These targets evaluate our effectiveness in managing material impacts, risks and opportunities, see ESRS

2 for more information. The Sustainability Committee also reviews and discusses with management any proposed sustainability targets (or changes to existing publicly disclosed sustainability targets) and recommends proposals to the Board for review and approval.

[🔗 For more detail on our sustainability targets see \(pg. 5 and 6\)](#)

### Integration of sustainability-related performance in incentive schemes

GOV-3-27, E1

As of 31 December 2024, the incentive schemes and remuneration policies for members of management and the Board were not directly linked to sustainability matters, targets or impacts.

### Risk management and internal controls over sustainability reporting

GOV-5-36(a-e)

Our climate-related risk management is integrated into our multi-disciplinary ERM process. Our ERM Committee oversees risk management activities across Ardagh Group and reports to the Audit Committee.

To help mitigate risks and promote clear controls in our reporting, our Ardagh Group sustainability reports are reviewed by the Chief Sustainability, Strategy & Transformation Officer AMP and the Chief Sustainability Officer AGP, our Ardagh Group Legal team and the Sustainability Committee (which includes members of executive management). In addition, we have established ESG working groups that report to the Chief Sustainability Officers and the Sustainability Committee. Specifically regarding CSRD, our multi-functional teams are responsible for interpreting ESG reporting requirements and ensuring a standardised approach across all reporting components.

We have identified several key risks in our sustainability reporting process and implemented targeted risk mitigation strategies:

- Data completeness and quality: we strive to continuously improve the accuracy and comprehensiveness of our sustainability data. We have adopted a sustainability reporting software tool to enhance data efficiency, automation and standardisation. We are strengthening our reporting processes through active engagement with data owners, training sessions and increased awareness of reporting requirements. We are also implementing controls and multiple levels of review to ensure data integrity. The sustainability reporting team provides ongoing support and conducts internal checks to verify the accuracy and completeness of collected data.
- Data source variability: we continuously monitor our data collection systems and processes for consistency across different sources. We are developing customised data collection methods tailored to specific operational environments, helping to ensure consistent and reliable input from all sources.
- Systems and process alignment: although we rely, in part, on manual reporting, our new ESG software system centralises and automates sustainability reporting. We continue to streamline and integrate reporting processes.

### Business conduct policies and corporate culture

G1-1-10(a-h, ex. d-f)

Our Code covers corporate culture and business conduct, including our commitments and expectations on:

- Acting ethically and with integrity
- Not taking unfair advantage of anyone, whether through manipulation, concealment, abuse of confidential information, misrepresentation or any other unfair practice
- Bribery and corruption
- Gifts and hospitality
- Conflicts of interest
- Corporate opportunities
- Accurate financial reporting
- Insider trading
- Competition and anti-trust compliance
- Sanctions and export control laws

Anyone who sees or suspects a violation of our Code, or of the law, is encouraged to speak up, raising their concerns either directly with line management, HR team or Ardagh Group Legal team, or reporting via our Speak Up Hotline.

[🔗 For more detail, see S1-1 \(pg. 77\)](#)

A failure to comply with our Code, policies or applicable laws may result in disciplinary action, which may include termination of employment.

## ESRS G1: Business conduct continued

In addition to our Code, our [Anti-Bribery and Corruption Policy](#) sets out our zero-tolerance approach to bribery and corruption and the procedures intended to support compliance with anti-bribery and corruption laws, including the US Foreign Corrupt Practices Act and the UK Bribery Act. Anyone who suspects or identifies bribery or corruption is encouraged to speak up, by reporting concerns either directly to the Group Compliance Director or on an anonymous basis through the Speak Up Hotline. All concerns are strictly confidential and investigated appropriately.

Our [Conflicts of Interest Policy](#) sets out how we ensure our decision-making processes are not influenced by undue personal interests. Where there are any conflicts of interest, we ensure these are disclosed, reviewed and recorded, improving transparency and safeguarding the integrity of Ardagh Group and our employees.

### Protection of whistleblowers

Ardagh Group encourages a speak up culture, where people raise concerns if they see or suspect something that is in violation of our Code, our policies or of the law. We have established reporting channels through which concerns may be raised in a confidential and effective manner. These are detailed in our Speak Up and Whistleblowing Policy, together with guidance on how to access these channels and how concerns are handled. Employees are encouraged to speak up if they have any concerns, including to their line management or local HR, who are often best placed to support concerns.

Employees can raise concerns directly with our Legal and Compliance team. In addition, our Speak Up Hotline helps employees to raise concerns anonymously, in a confidential, secure and effective manner. It is operated by an independent third party and has access restrictions to ensure that access to each case is limited to people investigating it.

We take all concerns reported seriously, and reports received via the Speak Up Hotline are handled by qualified investigators, in accordance with our Speak Up and Whistleblowing Policy. Ardagh Group is committed to ensuring that those reporting in good faith are protecting against any form of retaliation or discrimination.

All employees are provided training about speaking up, including how to use the Speak Up Hotline and our commitment to protect reporters from retaliation or discrimination.

Our Speak Up programme, including our [Speak Up and Whistleblowing Policy](#) and Speak Up Hotline, complies with legal requirements under relevant national laws transposing the [EU Whistleblowing Directive \(Directive \(EU\) 2019/1937\)](#).

### Business conduct training

All our employees are trained on business conduct, including our Code and how to speak up and raise concerns. In 2024, we rolled out a new business and ethics compliance training programme for all employees. In addition to courses on our Code and speaking, the programme covers anti-bribery and corruption, conflicts of interest, privacy and fraud prevention.

### Functions most at risk in respect of corruption and bribery

All Ardagh Group employees at risk in respect of corruption and bribery (due to their roles), including our Sales and Procurement teams, are required to undertake enhanced training on the prevention of bribery and corruption.

## Management of relationships with suppliers

G1-2-15(a-b)

### Responsible procurement

One of our strategy pillars is building a strong future and becoming a leader in sustainability. Both AMP & AGP Procurement teams actively contribute to this vision by working with suppliers that we believe are committed to fair and responsible practices within their own businesses and supply chains. Taking care of creating a robust but also responsible value chain is fundamental for our business. In 2024, we revised our Procurement Policy to properly reflect our principles, which form our Code, as well as reviewing our ways of working and upskilling our colleagues. We will continue this process in 2025.

All our procurement activity complies with relevant laws and regulations where we operate and source from, including laws on taxation, environmental regulations, employment, health and safety, and corruption. Our procurement procedures encourage supplier diversity, and (where appropriate) the development of small suppliers, start-up companies, local suppliers and minority-owned businesses. Our General Terms and Conditions and bespoke contractual arrangements reference our [Code of Conduct](#) and [Responsible Procurement Policy](#), which ensure that we engage with suppliers and contractors that subscribe to our business conduct principles. Our sourcing decisions are agreed through our Sourcing Councils, which ensure our business needs are properly covered and align with our business and sustainability strategies.

As part of our category management principles, within our Responsible Procurement Policy, we assess category-specific risk and opportunities: from supply continuity to innovations with suppliers. The objectives, corresponding business initiatives and measurements will be agreed with the business going forward. We also engage with Risk Domain Owners to implement risk management procedures (in accordance with our Third-Party Risk Management Policy). In 2025, AMP will launch a strategy refresh of its core categories.

### Partnering with our suppliers

AMP has established partnering programmes with key strategic suppliers of our core categories to create strong partnerships that go beyond transactional engagement and will drive our business growth. As part of each partnering programme, AMP identifies initiatives ranging from operational improvement to jointly building sustainable product offerings. It also engages and collaborates with suppliers to better understand risk and opportunities in the supply chain. In 2025, AGP will continue to develop its partnering programmes and regional supplier risk management initiatives.

### HREDD compliance with our suppliers

We operate a HREDD (Human Rights and Environmental Due Diligence) programme, as detailed in our [Responsible Procurement Policy](#). It enables us to assess and manage HREDD risks in our supply chain. The HREDD programme includes training for employees (including our Procurement team) on identifying risks within our supply chain and due diligence on suppliers. It is subject to regular review and assessment to ensure it meets our objectives.





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# Appendix

## ESRS 2 Disclosure requirements

IRO-2-56

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ESRS 2 GOV-1	21 (d)	Board's gender diversity	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II		96, 97
ESRS 2 GOV-1	21 (e)	Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II		96, 97
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	Indicator number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 (28) Table 1: Qualitative	Delegated Regulation (EU) 2020/1816, Annex II	Not applicable to Ardagh Group	
ESRS 2 SBM-1	40 (d) ii	Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	Not applicable to Ardagh Group	
ESRS 2 SBM-1	40 (d) iii	Involvement in activities related to controversial weapons	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 ( 29 ), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	Not applicable to Ardagh Group	
ESRS 2 SBM-1	40 (d) iv	Involvement in activities related to cultivation and production of tobacco			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	Not applicable to Ardagh Group	

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ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				41
ESRS E1-5	37	Energy consumption and mix	Indicator number 5 Table #1 of Annex 1				41
ESRS E1-6	40-43	Energy intensity associated with activities in high climate impact sectors	Indicator number 6 Table #1 of Annex 1				42, 44
ESRS E1-6	44	Gross Scope 1,2, 3 and Total GHG emissions	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		42, 44
ESRS E1-6	53-55	Gross GHG emissions intensity	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book - Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		42, 44
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				52

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ESRS E3-1	13	Dedicated policy	Indicator number 8 Table #2 of Annex 1				55
ESRS E3-4	28 (c)	Total water recycled and reused	Indicator number 6.2 Table #2 of Annex 1				58
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	Indicator number 6.1 Table #2 of Annex 1				58
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	Indicator number 11 Table #2 of Annex 1			Not applicable to Ardagh Group	
ESRS E4-2	24 (c)	Sustainable oceans/seas practices or policies	Indicator number 12 Table #2 of Annex 1			Not applicable to Ardagh Group	
ESRS E4-2	24 (d)	Policies to address deforestation	Indicator number 15 Table #2 of Annex 1			Not applicable to Ardagh Group	
ESRS E5-5	37 (d)	Non-recycled waste	Indicator number 13 Table #2 of Annex 1				69-72
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ESRS 2 - SBM3-S1	14 (f)	Risk of incidents of forced labour	Indicator number 13 Table #3 of Annex I			Not applicable to Ardagh Group	
ESRS 2 - SBM3-S1	14 (g)	Risk of incidents of forced labour	Indicator number 12 Table#3 of Annex I			Not applicable to Ardagh Group	
ESRS S1-1	20	Human rights policy	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				77
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ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	Indicator number 5 Table #3 of Annex I				78
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ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	Indicator number 14 Table #3 of Annex 1				92, 93
ESRS G1-1	10 (b)	United Nations Convention against corruption	Indicator number 15 Table #3 of Annex 1			Not applicable to Ardagh Group	
ESRS G1-1	10 (d)	Protection of whistle-blowers	Indicator number 6 Table #3 of Annex 1				96, 97
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)	Not applicable to Ardagh Group	
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	Indicator number 16 Table #3 of Annex 1			Not applicable to Ardagh Group	

