

Ardagh Group 2025 Sustainability Report

We make packaging for good





IN THIS REPORT

Message from our leadership team	1
Performance overview	3
Progress to targets	4

ESRS 2 General Disclosures

About this report	7
Governance	10
Strategy, business model and value chain	12
Impact, risks and opportunities	19
Policies, actions, metrics and targets	23

ESRS Environment

E1 Climate change	25
E2 Pollution	46
E3 Water	53
E4 Biodiversity and ecosystems	60
E5 Resource use and circular economy	67

ESRS Social

S1 Own workforce	80
S2 Workers in the value chain	104
S3 Affected communities	111
S4 Consumers and end-users	117

ESRS Governance

G1 Business conduct	123
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Appendix

ESRS 2 Disclosure requirements	130
ESRS 2 Data points that derive from other EU legislation	133

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



AMP



AGP

Message from our leadership team

2025 was a strong year for Ardagh Group, with revenue growth of 5% and increase in adjusted EBITDA of 11% despite complex and volatile market conditions. This reflects continued demand for our packaging solutions, alongside the positive impact of targeted restructuring actions. Our financial performance improved across both businesses, with EBITDA growth of 10% at Ardagh Metal Packaging (AMP) and 12% at Ardagh Glass Packaging (AGP), driven by improved operational efficiency and disciplined cost management.

Amid geopolitical volatility, regulatory pressure and accelerating climate impacts, together with the recapitalisation of Ardagh Group, resilience and long-term thinking remain essential. At the same time, our customers remain focused on decarbonising their products and supply chains, an area where we believe we play a critical role.

We continue to strengthen customer partnerships through investment across AMP, AGP and our supply chain, innovation in packaging design, and by supporting emissions reduction through highly recyclable packaging solutions. Working with customers and suppliers, we focus on key levers including increasing recycled content, improving efficiency and investing in lower-impact technologies.

Our sustainability strategy focuses on emissions, ecology and social impact—reducing carbon through efficiency and recycled materials, minimising resource use, and investing in our people to build a capable, engaged workforce.

In 2025, AMP demonstrated that growth and decarbonisation can advance together. Combined Scope 1 and 2 emissions were 16% below our 2020 baseline, with Scope 2 decreasing significantly. Scope 3 emissions remained intensity-stable and surpassed our 2030 target ahead of schedule achieving an 18% reduction versus our 2020 baseline.

AGP reduced Scope 1 and 2 emissions by 17% and Scope 3 by 11%, reflecting progress despite structural decarbonisation challenges in glass manufacturing. As a result, AGP's decarbonisation strategy focuses on increasing recycled glass content, improving furnace efficiency and expanding renewable electricity use across its operations.

Recycled content remains one of the most effective levers for emissions reduction. In 2025, at AMP, our average recycled content in our beverage can reached 76%. Across AGP, recycled glass, including both internal and externally sourced cullet, represented on average approximately 55% of total raw material input. To reach and maintain this, we engage with industry to support strong collection systems, including deposit return schemes and effective recycling infrastructure.



Oliver Graham, CEO
Ardagh Metal Packaging



Alexander Kuzan, CEO
Ardagh Glass Packaging Europe



In 2025, at AMP we advanced our decarbonisation pathway through two key initiatives: Firstly, we launched an industry leading Product Carbon Footprint (PCF) model, providing customer-specific, cradle-to-gate carbon data with unprecedented granularity in our sector. Built on verified Scope 1, 2 and 3 emissions, the model enables more informed decision making and supports the development of a standardised approach to carbon accounting, which AMP is helping to lead through an industry working group.

AMP also continued to invest in breakthrough technologies, most notably Uni-Alloy, which enables recycled content of close to 100% by removing alloy constraints on can ends. With the potential to be operational at scale, this innovation supports a more circular aluminium system and potentially delivering significant emissions reductions across the value chain.

At AGP, we are making tangible progress in decarbonising glass production, with our NextGen furnace in Obernkirchen, Germany delivering significant emissions reduction versus conventional processes, enabled

by using around 60% renewable electricity and 40% natural gas. In 2025, we partnered with customers to expand low-carbon glass production, including supplying Jägermeister with reduced-emission bottles.

We have continued to advance our environmental, social and governance performance. In 2025, AMP achieved our Zero Waste to Landfill (ZWTL) commitment across all operations. Water withdrawal intensity increased slightly, reinforcing the need to enhance water stewardship through improved efficiency, reuse and targeted investment in enabling technologies. AGP continues to make progress with 38% of facilities achieving the ZWTL target, while water withdrawal intensity improved by 7% year-on-year.

External recognition is important for us to measure ourselves against wider industry, and awards help to motivate teams and maintain momentum. We were therefore pleased to receive a wide range of awards in 2025 including our EcoVadis Platinum status as Ardagh Group. And we're always pleased to see our efforts recognised by our customers, such as our 'Brewing for the Future' award from Heineken in AMP-South America.

AGP received the 2025 Climate Award at the Packaging Europe Sustainability Awards for our Limmared facility (Sweden) with the installation of the hydrogen electrolyser, advancing the use of renewable hydrogen in commercial-scale glass melting.

Our people are key to delivering progress. AMP rolled out the Ardagh Metal Production System (AMPS) globally, supporting operational excellence through digital tools and continuous improvement. In addition, AMP introduced AMP Talks, enabling direct dialogue between employees and leadership, alongside a staff recognition programme (launching 2026) that encourages peer nomination and recognition.

AGP continued to implement its Glass Excellence programme, strengthening standardisation, technical capability and performance. A series of 'Glass Charter' initiatives have been launched to support this programme, covering areas such as technical training, good manufacturing practices and frontline leadership development.

At AMP and AGP, listening to our people remains central to how we lead. Through our global engagement survey, we aim to translate feedback into targeted local and global actions, while also expanding access to development through LinkedIn Learning. Through our values of Inclusion, Trust, Teamwork and Excellence, we continue to work to create workplaces where everyone can contribute and thrive. While this is a journey of continuous improvement, we are proud to see our progress recognised, including the Diageo UK Award for Excellence in Creating Opportunities.

Beyond our operations, our teams contribute to the communities in which we operate. This report highlights examples ranging from biodiversity initiatives in Serbia, to programmes supporting waste pickers in Brazil, as well as our broader Ardagh for Education and employee volunteering initiatives.

We know there is more to do to meet our targets. Accelerating decarbonisation across our value chain, increasing recycling in practice, and continuing to strengthen our role as a responsible employer and community partner remain key priorities. We are proud of the progress made and remain committed to delivering more sustainable packaging solutions.

CERTIFICATIONS





Performance overview 2025

NUMBER OF EMPLOYEES GLOBALLY

~20,000¹



¹ Includes the average number of employees in 2025 of Ardagh Holdings S.A. and its subsidiaries

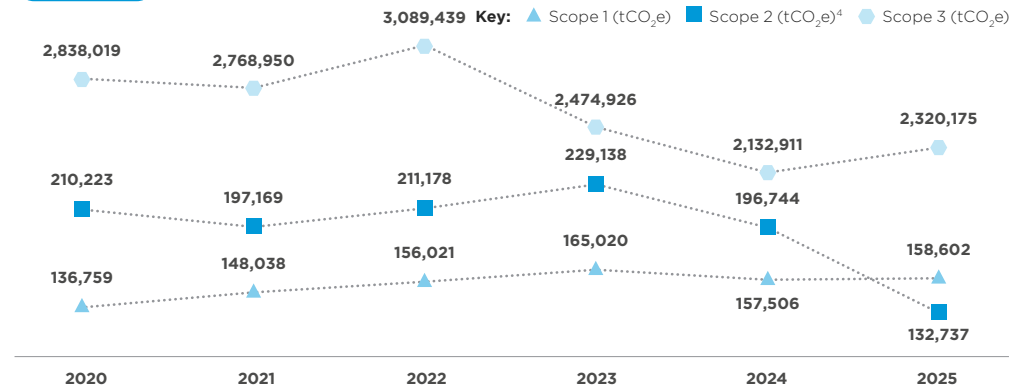
² Independently assured by ERM Certification and Verification Services Limited (ERM CVS). Please see their assurance report in the Sustainability, ESG reports and media section on our website for more details

³ Independently assured by Rise Research Institutes of Sweden AB (Rise). Inclusive of both internal and external cullet inputs

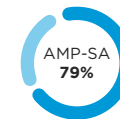
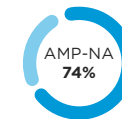
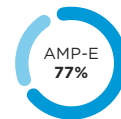
⁴ Market-based emissions

AMP

DECARBONISATION PROGRESS



RECYCLED CONTENT BY REGION

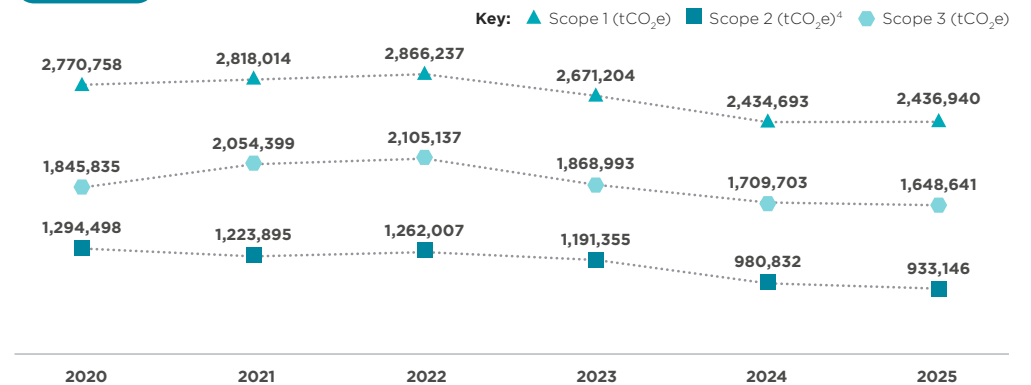


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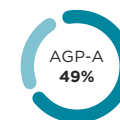


AGP

DECARBONISATION PROGRESS



RECYCLED CONTENT BY REGION



GLASS MELTED (T)





Progress to targets



We remain committed to the goals and sustainability objectives outlined in our sustainability strategy, focused on reducing greenhouse gas emissions (GHG), conserving natural resources and minimising environmental impacts across our global operations. In 2025, we maintained momentum and delivered continued progress towards the majority of our targets, against a 2020 baseline, despite annual sales volume growth of over 3% year-on-year.



EMISSIONS TARGETS¹

Renewable electricity

100%

Progress: 47%

In 2025, we increased the share of renewable electricity across our operations through continued investment in power purchase agreements (PPAs), green tariffs, on-site generation and renewable electricity certificates. Renewable electricity increased by 17% in 2025 compared with 2024, reaching 47% of total electricity consumption in AMP. Europe achieved 61% renewable electricity in 2025, up from 46% in 2024, while South America reached 100% and North America made good progress, achieving 20%.

Scope 3 GHG emissions

12.3% reduction

Progress: 100%

Total Scope 3 emissions increased slightly in 2025 compared with 2024, primarily reflecting the sales volume growth. On an intensity basis, Scope 3 raw material emissions remained consistent year-on-year. Compared with the 2020 baseline, we have significantly exceeded our 2030 Scope 3 reduction target, achieving an overall reduction of 18%, showing sustained progress over the long-term. The proportion of recycled content in our cans was 76% in 2025, compared with 64% in 2020. Recycled content did decline compared with 2024, reflecting macroeconomic conditions in 2025, which placed pressure on aluminium sheet producers' ability to secure recycled aluminium scrap. Despite year-on-year variability, our strategy to source lower-carbon aluminium, alongside improvements in the use of sustainable transport, continues to support progress in reducing Scope 3 emissions. Reducing material use, increasing recycled content, and driving innovation and operational efficiency remain central to our Scope 3 reduction strategy. In parallel, we have made significant progress to deliver a step-change in product carbon footprint (PCF) reporting, enabling more granular, product-level carbon data. This work underpins broader industry collaboration, with AMP leading the effort to establish a consistent and standardised approach to carbon accounting across the beverage can sector.

Scope 1 and 2 GHG emissions¹

42% reduction

Progress: 38%

Although AMP achieved year-on-year sales volume growth of over 3% in 2025, our combined absolute Scope 1 and 2 emissions decreased by 18% compared with 2024. Scope 1 emissions remained consistent year-on-year, off-setting the impacts of increased production, while Scope 2 emissions decreased by 33%, reflecting ongoing improvements in energy sourcing as well as increased manufacturing efficiency. Since the 2020 baseline, overall sales volume has grown by 22%, while Scope 1 and 2 emissions have declined by 16%, demonstrating continued progress towards our 2030 targets.

VOC emission intensity²

10% reduction

Progress: 100%

In 2025 we further reduced our volatile organic compounds (VOCs) intensity by 10% versus 2024. This has resulted in us exceeding our 2030 target to reduce VOC intensity by 10%, achieving a reduction of 18% compared with the 2020 baseline. This improvement reflects targeted investment in operations; increased use of low VOC chemicals and process improvements implemented across our facilities.



ECOLOGY TARGETS

Water withdrawal intensity²

20% reduction

Progress: 18%

Water withdrawal intensity increased slightly in 2025 compared with 2024, driven by changes in product mix. However, compared with the 2020 baseline, water intensity was still 3.6% lower. Progress towards our 2030 target of a 20% reduction is an area we understand needs continued focus. This is being supported by targeted efficiency projects and investments, particularly at facilities in areas of higher water stress, with further improvements expected as these initiatives are progressed.

Zero waste to landfill³

100% by 2025

Progress: 100%

In 2025, we achieved our commitment to zero waste to landfill (ZWTL) reaching 100% of this target across all globally operated sites. Maintaining this performance requires ongoing focus on reducing waste generation and maximising recycling to minimise waste that could otherwise be sent to landfill.

¹ Market based approach used to calculate Scope 2 GHG emissions

² For AMP, intensity data included for can body plants (4 ends plants + 1 hybrid plant with its ends production are excluded)

³ ZWTL applies only to operational waste streams and is implemented in accordance with internal standards and local regulations



Progress to targets



We remain committed to our strategic goals to reduce GHG emissions, conserve natural resources, and minimise environmental impacts across our global operations. The following section presents our progress against these targets, based on 2025 performance compared with our 2020 baseline.



EMISSIONS TARGETS¹

Renewable electricity

100%

Progress: 25%

In 2025, AGP increased renewable electricity coverage up to 25% from 22% in 2024 and 10% in 2020, reflecting continued progress in our energy transition. This improvement was driven primarily by increased renewable deployment in AGP Europe, where renewable coverage exceeded 50% in 2025, as well as reducing overall electricity usage following footprint optimisation.

Looking ahead, AGP has a pipeline of large-scale Power Purchase Agreements (PPAs) to support further progress toward our global renewable electricity targets, with a focus on Europe during the second half of the decade. In AGP-North America, commissioning of the solar installation at the Madera, California facility shifted to March 2026. AGP is also evaluating additional renewable electricity opportunities across North America and Africa to develop the pipeline further.

Scope 1 and 2 GHG emissions¹

42% reduction

Progress: 41%

By 2025, AGP's combined Scope 1 and 2 GHG emissions had decreased by 17% compared with the 2020 baseline, driven by renewable electricity adoption, deployment of lower-carbon technologies, energy efficiency improvements and changes in the operational footprint. Emissions decreased by approximately 1% from 2024 to 2025, despite regional impacts from utilisation and the easing of curtailments.



ECOLOGY TARGETS

Water withdrawal intensity

26% reduction

Progress: 13%

Water stewardship remains a priority across all AGP facilities and our water withdrawal intensity improved 7% year-on-year in 2025 and by 3% compared with the 2020 baseline. This was driven primarily by strong performance in AGP-Europe, where water conservation initiatives remain well advanced, and operational improvements in AGP-North America. These factors contributed to a marked improvement in 2025 relative to 2024, bringing progress toward AGP's water intensity targets back into positive territory.

Scope 3 GHG emissions

12.3% reduction

Progress: 87%

AGP Scope 3 emission totaled 1,648,641 tonnes in 2025 – a 4% reduction from 2024 and 11% below our 2020 base year. Emissions reductions are largely attributed to footprint optimisation in AGP-North America that were partially offset by growth in AGP-Africa. Looking ahead, we remain focused on supplier engagement and circularity initiatives to advance long-term reductions across our value chain.

Zero waste to landfill²

100%

Progress: 38%

AGP increased its ZWTL rate to 38% in 2025, up from 35% in 2024 and 32% in 2020. This improvement was driven primarily by progress in AGP-Africa, where a second facility achieved ZWTL status within two years, and by established waste minimisation practices across AGP-Europe. AGP continues to work toward broader adoption of ZWTL practices across all operations.

¹ Market based approach used to calculate Scope 2 GHG emissions

² ZWTL applies only to operational waste streams and implemented in accordance with internal standards and local regulations



About this report	7
Governance	10
Strategy, business model and value chain	12
Impact, risks and opportunities	19
Policies, actions, metrics and targets	23

General Disclosures

Investing in a more sustainable future across Ardagh Group





About this report

BP-1-3 to 6¹

Basis for preparation

BP-1-4(a)

This report presents information on Ardagh Holdings S.A. 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 statement included in our 2025 Statutory Consolidated Accounts for further information on our corporate structure, including certain changes to our corporate structure that occurred during 2025.

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 (Svensk Glasåtervinning). In 2025, for the first time, we have included environmental data for Heye International GmbH, a subsidiary of AGP.

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.

¹ References indicate the relevant paragraph number within the applicable European Sustainability Reporting Standard (ESRS), as adopted under the Corporate Sustainability Reporting Directive (CSRD)





ABOUT THIS REPORT CONTINUED

Extent the sustainability report covers our value chain

BP-1-4(b)

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 stakeholder expectations and data availability evolve. Our assessment and identification of material impacts, risks and opportunities (IROs) covers the whole value chain. Each chapter, in this report, contains material IROs and outlines the mitigation measures being implemented to address those IROs and related topics.

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-1-6

In regard to intellectual property and know-how, 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.

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-1-5

We have prepared this report to provide stakeholders with transparent and relevant information on our ESG performance for the reporting period ending 31 December 2025.

As of the date of this report, the European Union's (EU) Corporate Sustainability Reporting Directive (CSRD) and the related European Sustainability Reporting Standards (ESRS) are scheduled to apply to Ardagh Group 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. 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 July 2025.





ABOUT THIS REPORT CONTINUED

Disclosure in relation to specific circumstances

Time horizons

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

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 aim is to progressively reduce reliance on secondary data sources.

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

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

During the reporting period, Ardagh Group did not introduce any changes to the metrics, data sources, assumptions or methodologies used to measure and report on material impacts, risks and opportunities. The consistent application of methodologies between reporting periods supports the reliability and comparability of the disclosed information.

Disclosure of revised comparative figures

We made no other adjustments to comparative figures at the time of reporting. No revisions were required for AMP or AGP comparatives.

Material errors

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 second 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

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

Governance

GOV-1-11 to 12

The role of administrative, management and supervisory bodies in relation to sustainability

GOV-1-11, 12(a)

As of year-end 2025, the Board of Directors of Ardagh Holdings S.A. (the Board) had five members, four of whom were non-executive directors. Three of our non-executive directors are independent (representing 60% of our Board) according to the corporate governance standards of the New York Stock Exchange.

Pursuant to our articles of association, the Board must have at least three directors. The holders of our ordinary 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 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 [2025 Statutory Consolidated Accounts](#). As of the year-end 2025, all our Board members were male.

Ardagh Holdings S.A (the Company) 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. The Company's business is managed and conducted by (or under the direction of) the Board. The Board is the Company's ultimate decision-making body (except for those matters reserved to or shared with the shareholders). The Board's responsibilities are set out in the Company'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 three standing committees (the Committees): the Audit Committee, the Compensation Committee and the Nominating and Governance 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). The composition, duties and responsibilities of the three standing Committees are presented in our 2025 Statutory Consolidated Accounts. In the future, our Board may establish other committees, as it deems appropriate, to assist with its responsibilities.

On 12 November 2025, Ardagh Group S.A. (AGSA) reported that it had completed a comprehensive recapitalisation transaction in respect of certain debt of AGSA and its

affiliates (the Recapitalisation Transaction). As part of the Recapitalisation Transaction, a debt-for-equity swap was effected pursuant to which certain holders of AGSA's and its affiliates' indebtedness acquired indirect ownership of AGSA through the Company. Following completion of the Recapitalisation Transaction, the ultimate parent of AGSA and the Ardagh Group is the Company.

In connection with this change in ownership, the Board determined that maintaining separate board committees at AGSA was no longer necessary given AGSA's status as a direct wholly-owned subsidiary of the Company. Effective December 10, 2025, the board of directors of AGSA dissolved all of its standing committees, including the AGSA board and sustainability committee. Thereafter, no sustainability committee was formed as a Board committee of the Company. Instead, a new management-lead sustainability committee (the AGP Sustainability Committee) was formed to address matters related to the AGP operating business, including the AGP Chief Executive Officers (CEOs), AGP Chief Sustainability Officer (CSO) and Group Chief Risk Officer. This committee provides strategic oversight of sustainability matters. The CSO reports directly to the Board at least annually ensuring alignment with group-wide governance and risk management frameworks. In parallel, AMP has a Sustainability Committee at Ardagh Metal Packaging S.A board level, embedding sustainability oversight within AMP board's governance structure and reinforcing its commitment to accountable and effective sustainability leadership.

Skills and expertise to oversee sustainability matters

GOV-1-12(b)

The Nominating 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.

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 2025 Statutory Consolidated Accounts. In addition, the Board may draw on external expert advice.

Role and expertise related to business conduct

GOV-1-12(c)

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 Ardagh Group's [Code of Conduct](#) (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.

GOVERNANCE CONTINUED

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 the Code, reporting and disclosure of such violations (including reviewing quarterly reports prepared by the Compliance Committee) and any waivers granted by the Board under the Code.

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) as well as any submissions to our Speak Up Hotline.

Sustainability matters addressed by the administrative and supervisory bodies

GOV-1-12(d), (e)

From 2021 until the end of 2025, information related to sustainability matters has been provided to the board Sustainability Committee of AGSA at least four times

annually and to the full board of AGSA at least once a year. From 2026, matters related to AGP will be reported to the newly formed AGP Sustainability Committee and matters related to AMP will be reported to the AMP board Sustainability Committee. The matters include sustainability-related regulatory changes and evaluation of the impacts, risks and opportunities related to our sustainability strategy and major corporate actions.

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 and inform our decision-making processes. Management (and other members of the Sustainability team) regularly engage with the Sustainability Committees 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 discussed annually with the full Board as part of management's update on our ESG strategy, performance and reporting.

In accordance with their charters, during 2025, the board Sustainability Committee of AGSA (replaced by the AGP Sustainability Committee) and AMP board Sustainability Committees periodically reviewed performance against AMP's and AGP's publicly disclosed sustainability targets. These targets evaluate our effectiveness in managing material impacts, risks and opportunities. The Sustainability Committees also reviewed and discussed with management any proposed sustainability targets (or changes to existing publicly disclosed sustainability targets) and recommended proposals to the Board for review and approval.

Integration of sustainability-related performance in incentive schemes

GOV-2-13 to 14

As of 31 December 2025, 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-4-17 to 18

We have identified several key risks in our sustainability reporting process and implemented targeted risk mitigation strategies:

- **Governance and management oversight:** our Ardagh Group sustainability reports are reviewed by the Chief Sustainability and Integrated Business Planning Officer AMP and the Chief Sustainability Officer AGP, our Ardagh Group Legal team and the Sustainability Committees (which includes members of executive management). Specifically regarding CSRD, our multi-functional teams are responsible for interpreting ESG reporting requirements and ensuring a standardised approach across all reporting components.

- **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 with clearly defined roles and responsibilities, training sessions and increasing awareness of reporting requirements. We have also implemented 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 have introduced standardised data collection templates as well as data definitions and calculations methodologies. In addition, we have developed 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 ESG software system centralises and automates sustainability reporting. We continue to streamline and integrate reporting.

Strategy, business model and value chain

SBM-1-19, 20

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.



STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

Strategy

AMP

SBM-1-20

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. It operates 23 production facilities in nine countries, with revenue of approximately US\$5.5bn in 2025.

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

As of 2025, AMP employed approximately 6,300 individuals across its operations, excluding joint ventures and non-consolidated subsidiaries. The regional distribution of our workforce is as follows:

- **AMP-Europe:** 3,515 employees, across facilities in the UK and Germany, Poland, the Netherlands and other European countries
- **AMP-North America:** 1,856 employees, primarily in the US
- **AMP-South America:** 934 employees, located in Brazil

Our strategic 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

SBM-1-20

As at 2025, AGP operated 35 manufacturing facilities across the US, Europe and Africa with revenue of US\$4.1bn in 2025, 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 2025, AGP employed almost 12,500 individuals across its operations, excluding joint ventures and non-consolidated subsidiaries. The regional distribution of our workforce is as follows:

- **AGP-Europe:** 5,862 employees, across facilities in UK, Germany, Poland, the Netherlands and other European countries
- **AGP-North America:** 3,613 employees, all within the US
- **AGP-Africa:** 3,015 employees, located in South Africa, Nigeria, Kenya and Ethiopia

Our sustainability strategy, built on the three pillars of emissions, ecology and social, is integrated across regional operations and informs investment decisions, operational focus areas and stakeholder engagement.

However, delivering on this strategy presents a number of challenges:

- 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
- ZWTL 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

STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

Sustainability-related goals

Ardagh Group's sustainability ambitions are focused on our metal and glass packaging businesses and are applied consistently 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 set near-term SBTi-approved targets to reduce GHG emissions across our global operations. These include an absolute reduction of 42% in Scope 1 and 2 emissions by 2030, against a 2020 baseline, and a 12.3% absolute reduction in Scope 3 emissions over the same timeframe. While these targets are established at a corporate level, the contribution to emissions reductions will vary by region, facility and furnace, reflecting differences in technology deployment, investment cycles and local regulatory and market conditions.

Alongside our climate commitments, Ardagh Group is focused on reducing volatile organic compound (VOC) emissions, with AMP targeting a 10% reduction in VOC intensity by 2030. We are also strengthening water stewardship across our operations, with water intensity reduction targets of 20% for AMP and 26% for AGP by 2030.

Driving circular practices remains a core priority, supported by increased use of recycled content in both metal and glass packaging, driving improvements in resource efficiency and contributing to emissions reductions.

All regions are aligned on achieving ZWTL, with a 2025 target for AMP, which was met, and a 2030 target for AGP. In Africa, AGP has set an accelerated 2025 milestone for its South African operations in response to specific regulatory and operational considerations.

Features of its upstream and downstream value chain

SBM-1-20(a)

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.

→ [For more detail, see our AMP value chain graphic on page 15](#)

Upstream, AMP sources metal coils (prime and recycled 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's primary output is metal containers for use in beverage applications, delivered 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.

→ [For more detail, see our AGP value chain graphic on page 16](#)

Upstream, AGP sources materials such as silica sand, soda ash, limestone and post-consumer recycled glass (cullet) from global and regional suppliers. Raw materials are procured through supplier contracts, with due diligence applied to environmental and labour practices. Where available, cullet is sourced from municipal and commercial recycling systems, supported by industry associations and partnerships that 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.

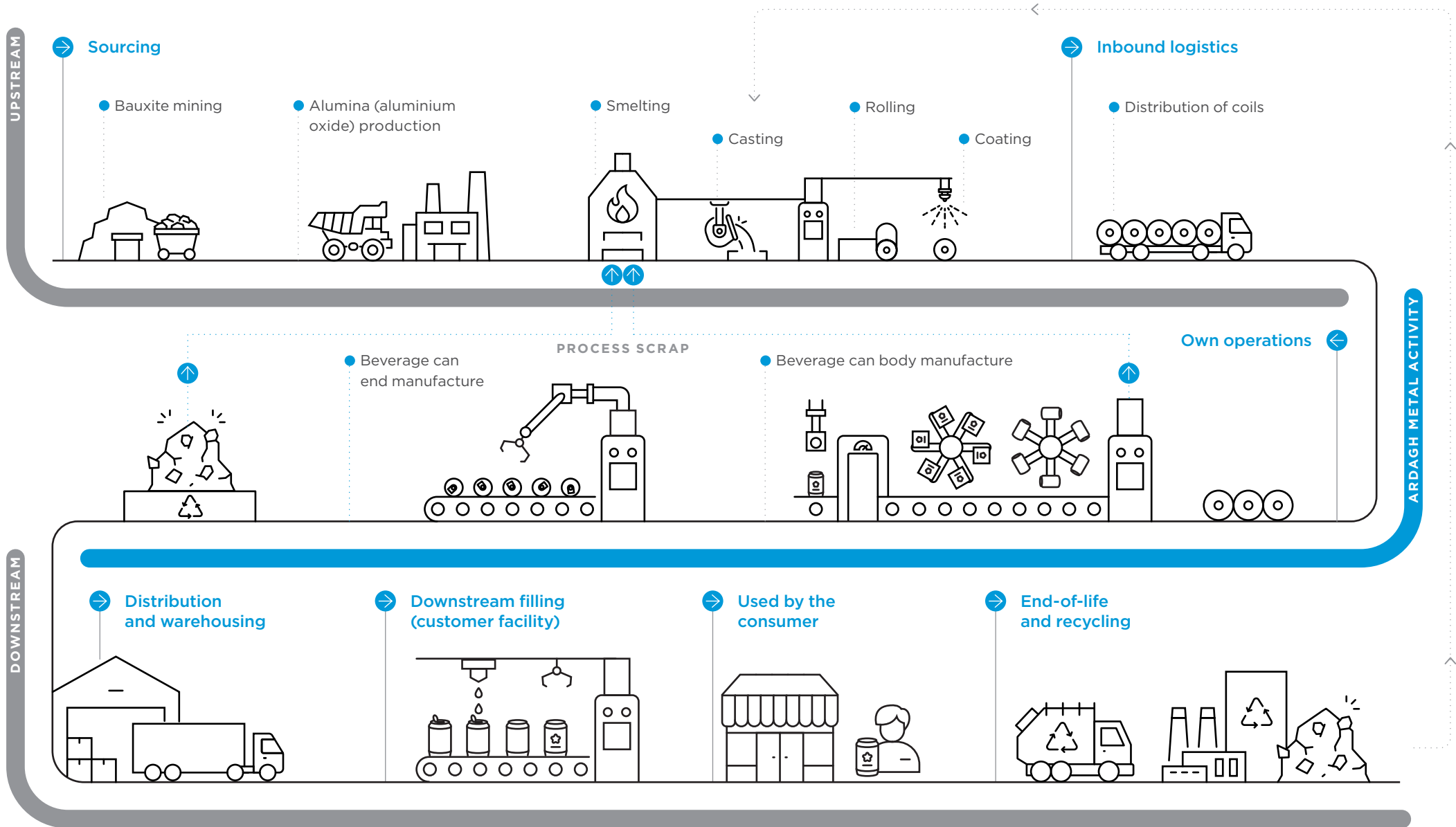
Energy is supplied by utilities and private contracts, with increasing attention to renewable sourcing. Key upstream partners include raw material suppliers, equipment manufacturers and industry recycling systems.

Downstream, AGP's primary outputs are glass containers for food, beverage and pharmaceutical applications, delivered 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's role in post-consumer recovery, varies across regions, our product design and stakeholder engagement strategies promote recyclability and circularity.

STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

AMP – Our value chain

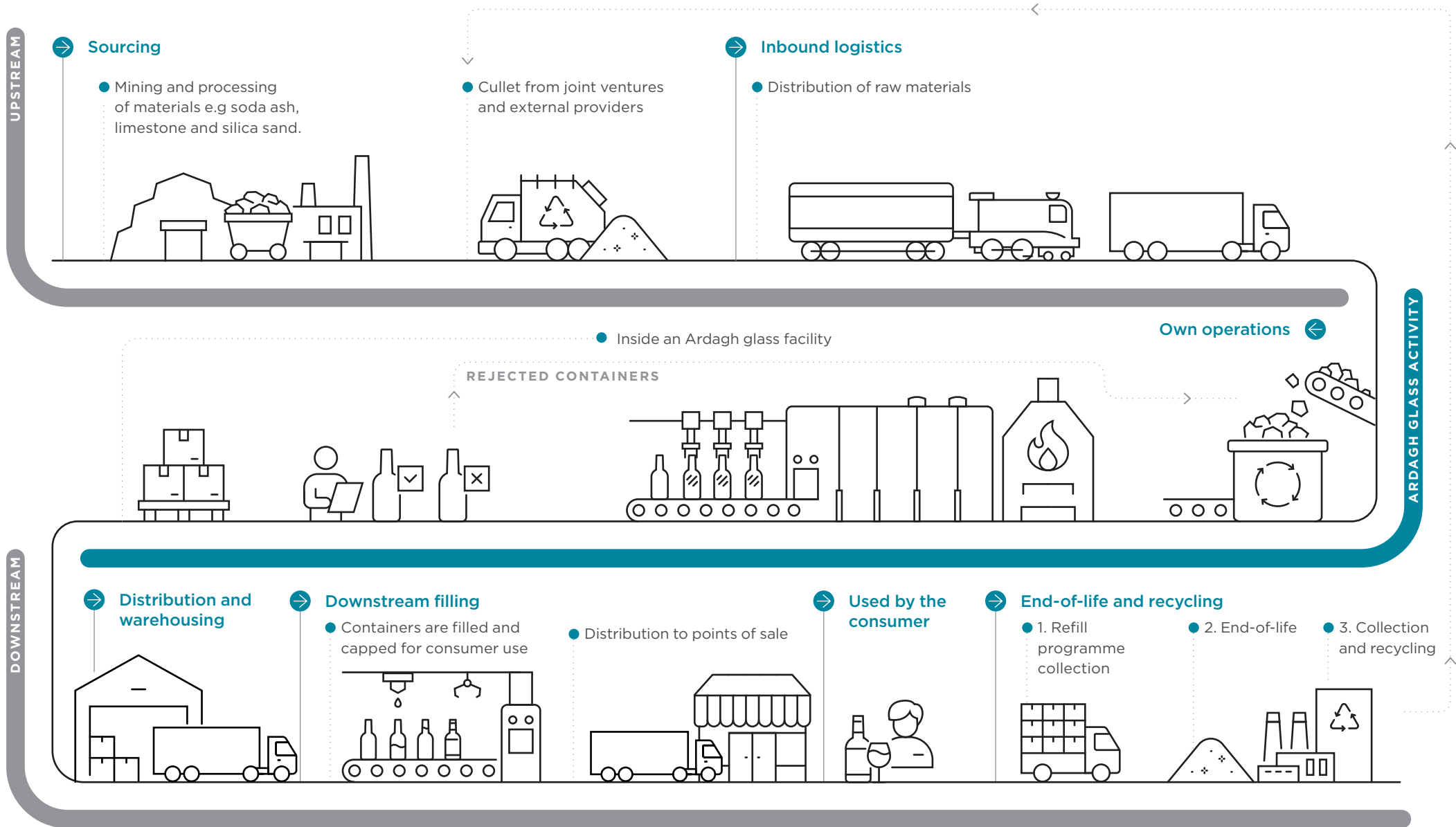
SBM-1- 20(a)



STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

AGP – Our value chain

SBM-1- 20(a)



STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

Interests and views of stakeholders

SBM-2-21, 22

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.

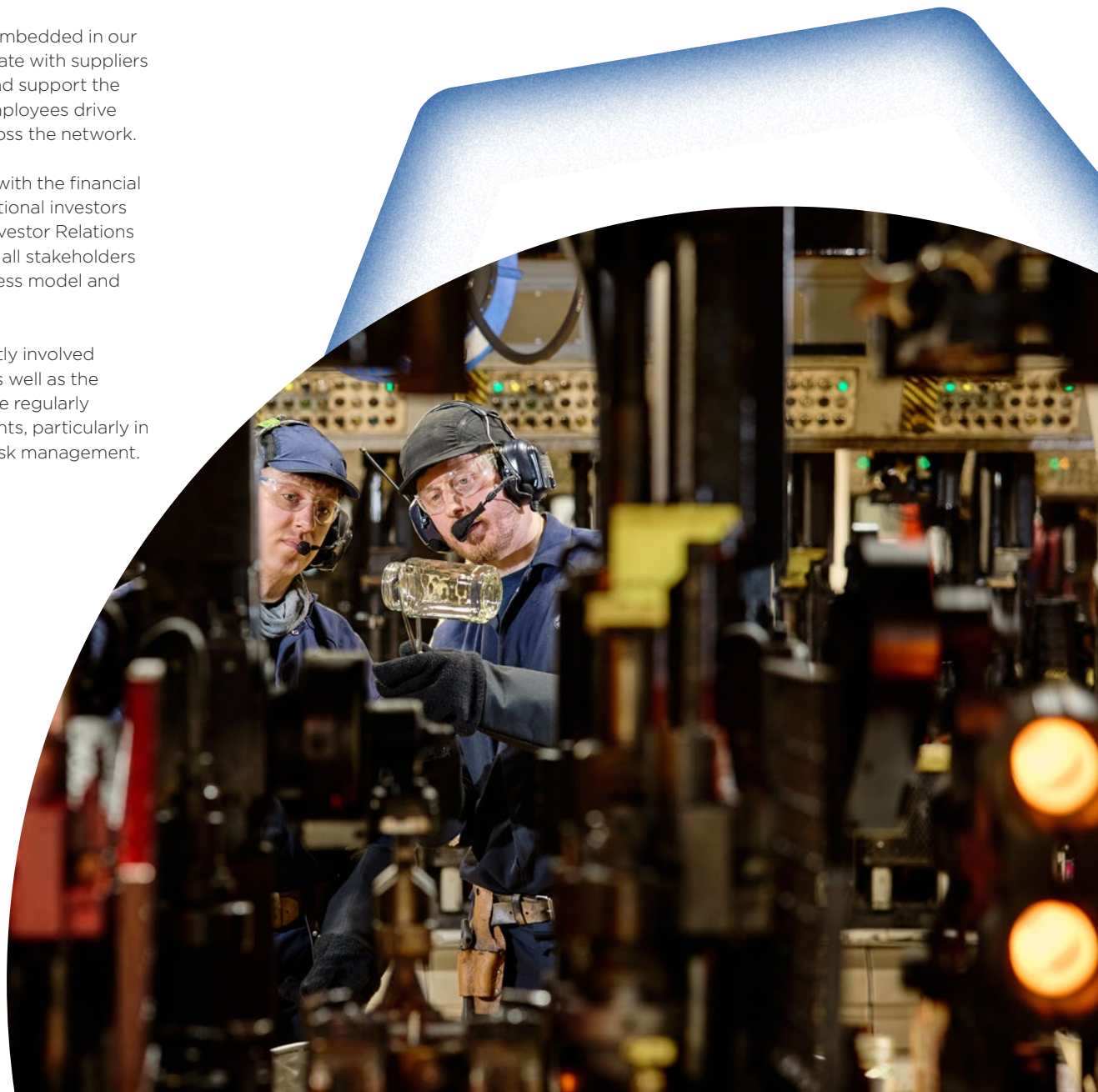
Engagement is conducted through formal mechanisms such as customer sustainability forums, supplier assessments, employee town halls and structured community partnerships. We also participate in cross-sector initiatives like FEVE's Close the Glass Loop in Europe and Ardagh4Education in the US, South Africa, 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, as well as the Sustainability Committees, are regularly updated on stakeholder insights, particularly in the context of strategy and risk management.





STRATEGY, BUSINESS MODEL AND VALUE CHAIN CONTINUED

Interests and views of stakeholders

Stakeholder	Engagement occurs	How it is organised	Purpose	Outcome taken into account
Customers	Regularly	- Periodic reviews and meetings with customers - Customer support queries - Day-to-day interaction	- Ensure order fulfilment and customer satisfaction - Understanding the demand for green solutions and customer expectations - Providing transparency and building trust	- Customer feedback is used to improve our product offering - Adaptation of marketing strategies e.g. NextGen furnace - Inform about investments
Employees	Regularly	- Learning and development - Employee engagement surveys - BWell programmes - Day-to-day interaction e.g. townhalls, unions, works councils	- To promote employee wellbeing, engagement and development - Understand employees' expectations and challenges	- Employee feedback leads to actions to help promote a happy and engaged workforce - Internal policies developed and communicated
Suppliers	Regularly	- Interviews and assessments for supplier due diligence - Workshops and industry collaborations, e.g. FEVE, CMI	- Promoting responsible sourcing, including minerals and metals - Protecting human and labour rights of workers - Ensuring a respectful working environment - Decarbonising our value chain and promoting circular solutions for resource use - Understanding supplier needs and concerns	- Informed procurement decisions - Collaboration for lower-carbon solutions and sourcing
Investors and ESG analysts	Regularly	- Quarterly reporting and earnings calls - One-to-one investor relations meetings	- Ensure transparent market communication and dialogue - Understanding investor concerns	- Investor feedback is part of the corporate decision-making process - Initiate action plans to improve ESG performance
Regulators and consultations	Adherence to regulatory requirements	- Consultation where required - Facility inspections	Ensure business is up to date with compliance requirements	Changes impact business decisions, procedures and reporting
Industry associations	Regularly	Workshops and industry conference and committee representation	- Seeking information or collaboration on common industry goals - Developing industry standards for sustainability - Pooling efforts to decarbonise hard-to-abate sectors in our supply chain	Feedback and information informs business decisions and projects
ESG rating agencies	Annually	Reporting on ESG frameworks	Create transparency and share ESG data	Demand for data and information informs our reporting practices

Impacts, risks and opportunities (IROs)

Interaction of material IROs with strategy

SBM-3-23 to 33

Ardagh Group's strategy and business model within the packaging materials industry, encompassing the design, manufacture, and supply of glass bottles and metal cans, are closely shaped by an ongoing assessment of material sustainability impacts, risks and opportunities. Operating in sectors characterised by energy intensive production processes, evolving regulatory requirements and strong stakeholder expectations regarding circularity, Ardagh Group integrates these considerations directly into long-term strategic planning and operational decision making.

Material environmental and social impacts, including GHG emissions from melting and smelting processes, resource consumption (such as cullet, primary aluminium and natural gas) and waste generation, influence the organisation's sustainability commitments and capital investment priorities. These impacts drive the business to focus on decarbonisation technologies, increased use of recycled content, water and energy efficiency and responsible sourcing of raw materials. Stakeholder expectations, particularly from our suppliers and customers, reinforce the strategic importance of circular packaging systems, recyclability and transparency regarding the environmental footprint of products.

Material risks such as volatility in energy prices, tightening EU regulations (e.g., packaging and packaging waste requirements), supply chain constraints for key materials and customer shifts toward lower-impact packaging solutions play a significant role in shaping the business model. These risks directly influence investment decisions, procurement strategies and long-term scenario planning.

At the same time, significant opportunities arise from increasing demand for sustainable packaging solutions. Growth in container glass recycling systems and advanced deposit return schemes, innovation in lightweighting of glass and metal and advances in furnace and smelting technologies, all support Ardagh Group's strategic development. These opportunities align closely with customer needs for packaging that is durable, inherently recyclable and compliant with evolving sustainability standards.

The interaction of these material IROs with the business strategy influences financial decisions, including shifts in operating costs due to energy efficiency investments, revenue opportunities linked to premium lower-carbon or high-recycled content packaging and the potential for reduced long-term exposure to carbon pricing mechanisms. Understanding and actively managing these dynamics supports the resilience and competitiveness of Ardagh Group's business model while reinforcing its role in enabling a circular packaging economy.

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.



IMPACTS, RISKS AND OPPORTUNITIES CONTINUED

Double materiality assessment

IRO-1-34,35 IRO-2-37(c)

In alignment with ESRS requirements, we conducted our first double materiality assessment (DMA) in 2024. This marked a significant step in strengthening the alignment between our sustainability strategy, stakeholder expectations and organisational

priorities. The assessment enhanced the foundation of our existing ESG approach and deepened our understanding of the sustainability impacts, risks and opportunities most relevant to our operations, stakeholders and the environment.

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.

Key: ● Own activities ○ Value chain activities





IMPACTS, RISKS AND OPPORTUNITIES CONTINUED

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).

The DMA identified our most material sustainability topics, reflecting both stakeholder priorities and areas with the potential to create value or pose risk to the business. In line with CSRD and best practice, we refreshed the DMA in 2026 to reassess material topics for the 2025 reporting period as well as to address material topics specific to AMP only, AGP only or both. This refresh ensured that our materiality conclusions remained accurate, current and responsive to changes in our operating context, including developments in regulation, business activities, market conditions, stakeholder expectations and emerging sustainability risks and opportunities.

As part of this refresh, and reflecting the application of the revised CSRD standards, there were changes to the identification and assessment of material impacts, risks and opportunities (IROs). The updated standards and enhanced analytical approach led to a refinement of existing IROs, the identification of additional material IROs and the removal of others that were no longer considered material based on updated evidence, thresholds and business context. These changes resulted in corresponding additions to, and removals from, the list of material sustainability topics. Overall, this outcome reflects a more robust, granular and standardised assessment, strengthening the alignment of our material topics with regulatory expectations, evolving sustainability risks and opportunities and the actual impacts and value drivers of AMP and AGP.

Regularly refreshing the DMA supports continuous improvement in our sustainability governance, allows us to capture new or evolving impacts and risks and ensures that our disclosures and strategic focus remain aligned with regulatory expectations and our long-term business strategy.



IMPACTS, RISKS AND OPPORTUNITIES CONTINUED

The following provides an overview of the approach and methodology used to complete the DMA process:

Review

In the review phase, existing work and materials are examined to gather all necessary inputs for refining the IRO approach and updating the supporting methodology. This includes identifying opportunities to improve the 2024 DMA methodology, undertaking peer and sector benchmarking to benchmark against industry best practice and analysing value chain relationships and dependencies. The team also reassesses the approach to IRO identification to ensure it reflects current expectations and organisational priorities. The outcome of this phase is a consolidated DMA methodology for 2026, incorporating key revisions, identified gaps and clear integration points.

Refine

The refinement phase focuses on improving the clarity, structure and relevance of the IROs, including defining specific requirements for the metal and glass divisions. This involves reviewing and refining the IRO list, determining division-specific adaptations and compiling the supporting evidence needed to demonstrate strong traceability and auditability. All proposed refinements were shared with the core project team and select subject matter experts from across AMP and AGP.

The result is an updated, well structured IRO list, with improved definitions and aligned supporting documentation.

Integrate

During integration, the scoring methodology is reworked to ensure that criteria are clearly defined and consistently applied when assessing the refined IROs. This stage includes redesigning the scoring criteria, carrying out the full IRO assessment and reviewing and validating the outcomes with subject matter experts across Ardagh Group. Alignment with existing assessment tools is also ensured. The output is a fully assessed IRO list in Excel, supported by an updated and transparent scoring framework. Feedback from Ardagh Group was gathered to validate scoring, updating IRO scores and justifications where necessary.

Document

The documentation phase brings the process together by finalising the refined IROs, the updated methodology and the overall DMA process. This involves formally documenting the 2026 DMA process, including all steps, inputs, decision criteria and resulting material topics. The final deliverable is a comprehensive report that clearly captures the refreshed DMA methodology and the outcomes of the reassessment.

1.1 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 0–4 point scale for both magnitude and likelihood.

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 subject matter experts (SMEs) to ensure alignment with our priorities and reporting requirements.

1.2 Assess IROs for materiality

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.

Validation and reporting

The validated results of the DMA were reviewed 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 topics under the CSRD.



Policies, actions, metrics and targets

IRO-2-38 to 40, GDR-P-41 to 43, GDR-A-44 to 46
GDR-M-47 to 49, GDR-T-50 to 52

In keeping with our alignment with ESRS 2 disclosure requirements, information on policies, actions, metrics and targets is disclosed within each relevant topical ESRS chapter. This approach ensures that policies, actions and targets are presented with reference to the related material impacts, risks and opportunities (IROs) providing greater clarity, coherence and context. Cross-referencing has been applied where appropriate to support navigability and ensure that all ESRS 2 requirements are fully addressed while avoiding duplication.





E1 Climate change	25
E2 Pollution	46
E3 Water	53
E4 Biodiversity and ecosystems	60
E5 Resource use and circular economy	67

Environment

Taking environmental
actions across our
value chain





E1 Climate change

At Ardagh Group we implement and support pollution prevention measures relating to air, water and soil. Each manufacturing facility is certified to ISO 14001 – and assesses itself against the Ardagh Group BGreen7 standards – to reduce environmental risks, mitigate the risk of environmental incidents and control and reduce environmental impact.

IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive – Negative

Financial materiality

✔ Opportunity ✔ Risk

UPSTREAM

- ✔ Physical climate risk
- ✔ Climate change adaptation measures
- ✔ Emissions reduction targets
- Energy use in manufacturing **AMP only**
- ✔ Cost of energy **AMP only**
- Supplier energy practices



- ✔ Physical climate risk
- ✔ Climate change adaptation measures
- Climate change mitigation measures
- ✔ Transition to lower carbon technologies
- ✔ Emissions reduction targets
- Energy use in manufacturing **AGP only**
- ✔ Cost of energy **AGP only**



OWN OPERATIONS

DOWNSTREAM

- ✔ Climate change adaptation measures
- ✔ Emissions reduction targets





E1 CLIMATE CHANGE CONTINUED

Impact, risks and opportunities

IRO type

Positive
 Negative
 Opportunity
 Risk

Entity

GROUP Ardagh Group
 AMP Ardagh Metal Packaging
 AGP Ardagh Glass Packaging

Value chain stage

Upstream
 Own operations
 Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Climate change adaptation				
Physical climate risk	Increasing physical climate-related changes, such as more frequent or severe extreme weather events, could lead to disrupted operations, reduced efficiency and potential damage to assets, resulting in financial impacts on operating and capital costs, strategic risks to business continuity and potential reputational harm related to climate resilience.		GROUP	U O
Climate change adaptation measures	Increasing adaptation needs driven by physical climate impacts throughout the value chain could lead to necessary investments in climate-resilient infrastructure, resulting in higher OpEx and CapEx and strategic risks to production continuity.		GROUP	U O D
Climate change mitigation				
Climate change mitigation measures	Insufficient implementation of energy-saving measures, efficiency improvements and effective waste practices in the manufacturing process, could lead to higher GHG, increased resource consumption and indirect impacts on biodiversity loss.		GROUP	O
Transitioning to lower-carbon technologies	Transitioning to lower-carbon technologies and energy sources, could lead to reduced GHG and improved energy efficiency, while creating opportunities to access voluntary carbon markets, resulting in financial benefits through lower operating costs and potential revenue or cost-offsets from high-quality carbon credits, enhanced strategic positioning in a low-carbon economy and improved regulatory alignment.		GROUP	O
Emissions reduction targets	Failure to meet emissions reduction targets or comply with emerging environmental regulations could lead to non-compliance issues, regulatory scrutiny and stakeholder concerns, resulting in legal and regulatory penalties, financial impacts and reputational harm.		GROUP	U O D



E1 CLIMATE CHANGE CONTINUED

IRO type

Positive
 Negative
 Opportunity
 Risk

Entity

GROUP Ardagh Group
 AMP Ardagh Metal Packaging
 AGP Ardagh Glass Packaging

Value chain stage

U Upstream
 O Own operations
 D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Energy				
Energy use in manufacturing	High energy use associated with metal production processes (such as alumina refining and smelting), in the upstream value chain, potentially leading to increased GHG, contributing to climate change.		AMP	U
	Energy-intensive manufacturing activities (particularly within glass production) in operations, could lead to significant GHG, elevated operational costs and wider environmental impacts.		AGP	O
Cost of energy	Increasing energy costs in the upstream value chain, could lead to higher operating expenses and reduced cost efficiency, resulting in financial impacts on OpEx and overall profitability, as well as strategic challenges in maintaining competitive performance.		AMP	U
	Increasing energy costs in operations could lead to higher operating expenses and reduced cost efficiency, could result in financial impacts on OpEx and overall profitability, as well as strategic challenges in maintaining competitive performance.		AGP	O
Supplier energy practices	Sourcing raw materials from suppliers with high energy intensity mining processes in the upstream supply chain, could lead to increased GHG and air emissions related to upstream value chain practices that contribute to environmental degradation and climate-related impacts.		GROUP	U



E1 CLIMATE CHANGE CONTINUED

Introduction

Ardagh Group's manufacturing activities generate environmental impacts primarily related to energy use, GHG emissions, material consumption, waste generation and water use. These impacts arise across the Group's operations and value chain and are managed through defined systems, processes and operational controls.

Climate-related management focuses on reducing GHG emissions and improving resource efficiency across Scope 1, Scope 2 and relevant Scope 3 emission categories. Key areas of focus include energy efficiency, lower-carbon energy sourcing, increased use of recycled materials, material optimisation and waste reduction.

Ardagh Group's approach to climate change mitigation is informed by the characteristics of our core packaging materials, aluminium and glass, which are durable, and recyclable and support circular economy principles. Climate-related impacts, risks and opportunities are addressed through the strategy, actions, targets and governance arrangements described in this chapter.

Strategy

Transition plan for climate change mitigation

E1-1-10, 11, 12

Ardagh Group's climate transition plan supports the achievement of our 2030 GHG emissions reduction targets approved by the SBTi. The plan provides a structured, Group-wide approach to reducing emissions across Scopes 1 and 2 and relevant Scope 3 categories, while maintaining operational reliability and financial discipline.

The transition plan is based on three key assumptions and dependencies: the availability of recycled aluminium and glass at scale; access to lower-carbon energy, particularly renewable electricity; and the technical maturity and deployment timing of lower-carbon technologies within existing asset lifecycles. These factors influence the pace, sequencing and potential impact of decarbonisation measures across Ardagh Group's operations.

In 2024, Ardagh Group published structured decarbonisation roadmaps for AMP and AGP, covering operations in Europe, North America, South America and Africa. These roadmaps set out the primary levers through which emissions

reductions are pursued, reflecting the distinct production processes and energy requirements of metal and glass packaging while applying a consistent strategic approach across Ardagh Group.

A central element of the transition plan is increasing the use of recycled materials. For aluminium packaging, higher percentage of recycled content significantly reduces upstream emissions associated with primary aluminium production. For glass packaging, increasing cullet input reduces energy demand in furnaces and associated process emissions. Their effectiveness depends on recycling rates, collection infrastructure and material input quality across Ardagh Group's markets.

The transition plan recognises that certain GHG emissions are structurally locked in due to the long operational lifetimes and capital intensity of manufacturing assets. Major assets are replaced or rebuilt based primarily on technical condition, safety and operational requirements rather than based on climate-related considerations.

As a result, residual Scope 1 emissions are expected to remain through current asset cycles, including to 2030. Emissions reductions are therefore pursued within these constraints through energy efficiency improvements, lower-carbon energy sourcing, increased recycled-material use and the incorporation of lower-carbon technologies, where feasible, during scheduled rebuilds.

The transition plan has been reviewed and approved at a strategic level through established governance structures within AMP and AGP, reflecting alignment on overall direction, key decarbonisation levers and 2030 emissions reduction objectives. Approval of individual projects, technologies and capital investments contributing to the transition plan is undertaken through existing management and capital allocation processes and is not embedded in the strategic approval of the transition plan itself.

E1 CLIMATE CHANGE CONTINUED

Decarbonisation levers

AMP

AMP's decarbonisation strategy focuses on reducing energy demand, maximising recycling rates for aluminium and optimising materials' usage. Its key levers for decarbonising are:

- **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 lower-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

AMP continues to explore other levers to maximise impact this decade, including selecting technologies for sustained decarbonisation beyond 2030.

AGP

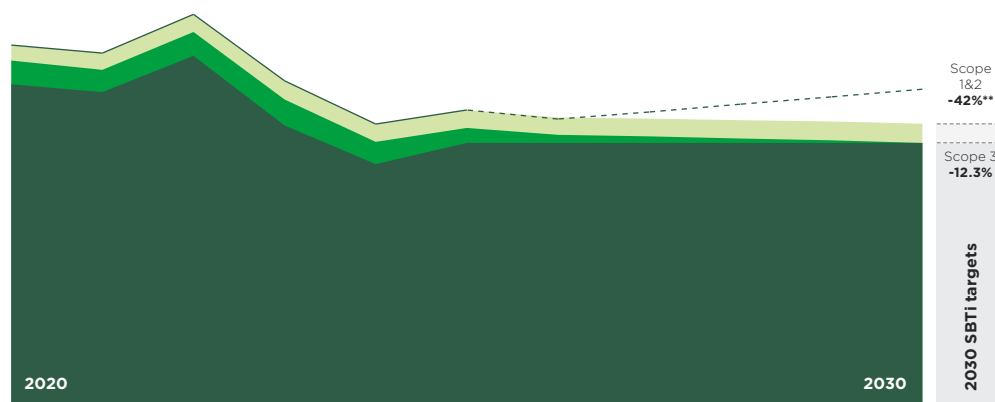
AGP's decarbonisation strategy reflects the energy intensive nature of glass manufacturing and the long operational lifetimes of furnace assets. The strategy prioritises reductions in energy-related emissions, increased use of recycled materials and the deployment of lower carbon technologies within existing asset cycles. Its primary decarbonisation levers are:

- **Energy transition:** increasing the procurement of renewable electricity and evaluating lower carbon fuel options for thermal processes, including hydrogen and biofuels, where technically and economically feasible
- **Circular material use:** increasing cullet input in furnaces to reduce emissions associated with raw material extraction, transport and melting, while improving overall furnace efficiency

- **Energy efficiency:** reducing energy demand through furnace rebuilds, batch optimisation and investment in higher efficiency plant infrastructure
- **Technology and innovation:** advancing hybrid and lower carbon furnace technologies, including the NextGen Furnace, and using digital tools to improve energy monitoring, process control and operational performance

The selection and prioritisation of these levers are informed by internal lifecycle assessments, AGP developed models and collaboration with industry organisations, including FEVE, Glass Futures and the Glass Packaging Institute.

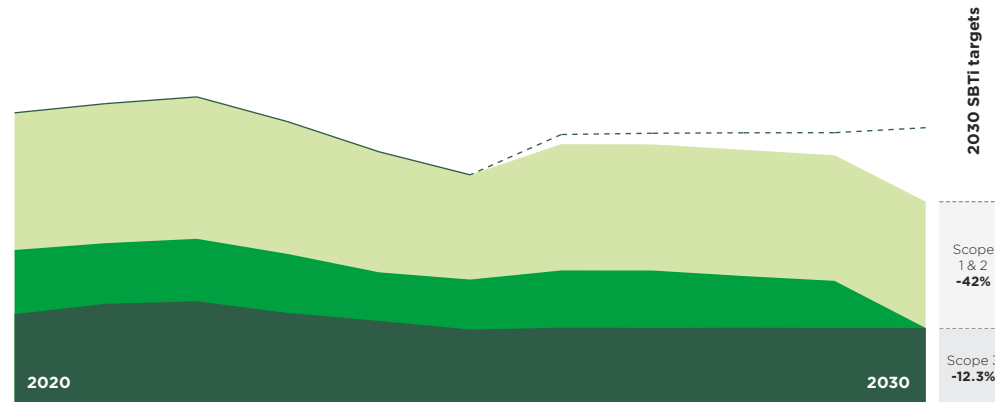
FIG. 2025 AMP DECARBONISATION ROADMAP



* Baseline figures for emissions are from 2020

** Scope 2: 100% renewable electricity by 2030

FIG. 2025 AGP DECARBONISATION ROADMAP



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



E1 CLIMATE CHANGE CONTINUED

Investment and funding

AMP APPROACH

AMP is deploying capital in a targeted and disciplined manner to deliver emissions reductions across Scopes 1, 2 and 3, consistent with our SBTi approved transition pathway. In 2025, AMP invested \$15.9 million in innovation and decarbonisation initiatives, prioritising solutions that deliver structural, long-term reductions across our operations and value chain.

In parallel, AMP continued to invest in Scopes 1, Scope 2 and Scope 3 decarbonisation across its manufacturing footprint:

- **Energy efficiency (Scope 1 and Scope 2):** Investments of \$2.5 million focused on reducing fuel and electricity consumption through operational efficiency improvements, directly lowering combustion-related emissions (Scope 1) and purchased electricity emissions (Scope 2).
- **Energy transition (Scope 2 and selected Scope 1):** Investments of \$1.2 million to accelerate the transition to renewable electricity and alternative lower-carbon thermal solutions, reducing reliance on fossil-based energy sources and supporting the 100% renewable electricity ambition. Innovation remained a central enabler across all Scopes. This included investments to identifying and scaling breakthrough technologies for the longer-term decarbonisation strategy for reducing Scope 1 emissions and reliance on fossil
- fuels. These investments are designed to deliver sustained emissions reductions beyond individual facilities, supporting decarbonisation across the broader aluminium and beverage packaging value chain.
- **Sustainable transport (primarily Scope 3 and Scope 1):** Targeted investment with pilot trials with customers; partnering with logistics providers to reduce emissions associated with inbound and outbound logistics; addressing transport-related emissions within the value chain; and converting from fossil fuel-based fork-lift trucks to electric.
- **Circularity and material use:** To further address Scope 3 emissions, AMP invested \$9.9 million in innovation in circularity and material efficiency initiatives, including product design optimisation and increased recycled content in aluminium. These actions reduce material intensity and upstream emissions associated with primary aluminium production, while maintaining product performance and quality.
- **Innovation:** A significant part of our investment in innovation was in the implementation of the Uni-alloy technology, which represents a step change in aluminium can sustainability. This breakthrough technology removes the alloy material constraint on can ends, enabling a highly circular aluminium solution with recycled content levels of close to 100%.

As purchased aluminium is AMP's largest source of Scope 3 emissions, this investment directly targets the most material part of our footprint. Importantly, the investment has already unlocked the operational capability to deploy this technology at scale, positioning AMP to deliver material reductions in value chain emissions as adoption increases across our customers.

- **Data-driven transparency (Scope 1, 2 and 3):** AMP has invested \$183 thousand in developing a PCF model that converts verified Scope 1, 2 and 3 emissions into customer-specific, product-level footprints. This model provides product and facility-level carbon data, improving transparency and enables the identification and tracking of key decarbonisation levers across circularity, energy sourcing and lightweighting to inform future transition investments. This model is the foundation for developing a standardised carbon accounting process across the aluminium and beverage packaging value chain.

Collectively, these investments demonstrate how AMP is aligning capital allocation with climate priorities. By directly linking funding decisions to Scope 1, 2 and 3 emissions impacts, we are strengthening the credibility of our transition plan and accelerating progress toward our 2030 SBTi approved targets.

E1 CLIMATE CHANGE CONTINUED

AGP APPROACH

AGP is deploying capital in a targeted and disciplined manner to support progress against its climate objectives and SBTi-approved targets, while maintaining a strong focus on operational resilience and financial discipline. In 2025, AGP invested more than \$6 million in initiatives focused on energy efficiency, electrification and the advancement of lower-carbon technologies across its operations (excluding capital expenditure associated with conventional furnace rebuilds). Investment decisions are integrated within AGP's existing capital allocation and asset management processes and are assessed alongside broader operational, safety and financial considerations.

During the reporting period, investments included:

- **Energy efficiency (Scope 1 and Scope 2):** Over \$1.7 million in investments focused on reducing fossil fuel and electricity consumption through targeted operational improvements, including compressed air optimisation, furnace energy management and equipment upgrades and replacements. These actions support incremental emissions reductions while improving asset performance and reliability.
- **Energy transition (Scope 1 and Scope 2):** Continued consideration of electrification pathways, supported by selective investments of over \$2.5 million in the electrification of facility vehicle fleets and preparatory work to enable future electrification opportunities where technically and economically feasible.

- **Circularity and material use (Scope 3):** Ongoing partnership development and targeted investments to increase recycled glass content, supporting reductions in upstream emissions associated with virgin raw material use and advancing more circular material flows.
- **Data-driven transparency and systems (Scope 1, Scope 2 and Scope 3):** Investment of over \$200 thousand in automated data monitoring and management systems to strengthen operational control, improve the quality and consistency of sustainability-related data and support more informed decision-making over time.

Collectively, these investments demonstrate how AGP is embedding climate-related considerations within its capital allocation framework. Investment decisions are informed by their contribution to AGP's Scope 1, 2 and 3 emissions profile, as well as their alignment with broader climate ambitions, alongside strategic and financial priorities. This measured approach enables AGP to continue targeted investment in support of its transition plan, even in a challenging external environment, while maintaining progress toward its 2030 SBTi-approved targets.

Assessing potential locked-in emissions

The decarbonisation levers described below reflect the specific operational characteristics of AMP and AGP and represent the primary mechanisms through which Ardagh Group's transition plan is implemented.

AMP APPROACH

The causes of locked-in emissions may include the relatively long lifespan of beverage can manufacturing facilities, with complex assets that are expensive and hard to replace¹. They can also arise due to the use of aluminium as a primary raw material, whose production can be energy intensive. To address these challenges, AMP has continued to:

- Invest in energy-efficient practices to reduce energy consumption
- Source more renewable energy
- Reduce raw material consumption
- Advocate for higher recycling rates through trade associations
- Work in partnerships with suppliers to procure more can sheets with a higher recycled content
- Support industry initiatives to reduce energy-intensive virgin aluminium mining which accounts for the overwhelming majority of GHG emissions of AMP products

AGP APPROACH

AGP operates long-life assets such as container glass furnaces, which can have operational lifetimes exceeding 15 years. These assets contribute to locked-in emissions over their lifecycle. AGP has continued to:

- Incorporate lower-carbon technologies and efficiency improvements during furnace rebuilds
- Align lower-carbon energy sourcing with rebuild timelines,
- Use internal modelling to assess asset-level emissions trajectories and transition risks (see E1-4).

These approaches are intended to reduce long-term emissions intensity and future transition risk while preserving operational resilience and capital discipline.

Strategic alignment and Board approval

Climate-related matters are overseen through formal governance structures within Ardagh Group's operating businesses, reflecting their distinct legal and organisational arrangements. Oversight responsibilities are aligned to the respective Boards and management structures of AMP and AGP.

AMP GOVERNANCE

Climate-related oversight at AMP is provided by the board-level Sustainability Committee of Ardagh Metal Packaging S.A. (AMPSA). This committee reviews climate-related strategy, performance, material risks and progress against emissions-reduction objectives. The AMPSA governance structure remained unchanged during the reporting period.

AGP GOVERNANCE

During most of the 2025 reporting period climate-related oversight for AGP was provided primarily through the Board-level Sustainability Committee of AGSA. The AGSA Sustainability Committee was disbanded in the fourth quarter of 2025.

In 2026, the AGP Sustainability Committee was formed operating under the authority of the AGP CSO and the regional CEOs. See page 10 for further details.

¹ Source: International Aluminium Institute: Aluminium Sector Greenhouse Gas Emissions – International



E1 CLIMATE CHANGE CONTINUED

Decarbonisation roadmap progress

AMP APPROACH

AMP has set ambitious SBTi approved targets to reduce absolute Scope 1, 2 and 3 GHG emissions by 2030, against a 2020 baseline. Despite business growth of over 3% in 2025, absolute Scope 1 and 2 emissions decreased year-on-year by 18%. This reflects continued execution of energy efficiency programmes, accelerated transition to renewable electricity and targeted deployment of pilot-scale technologies to reduce or eliminate fossil fuel-based thermal energy. Together, these actions have effectively neutralised the emissions impact of our growth to date.

Our decarbonisation roadmap is based on deploying under our key strategic pillars:

- **Energy efficiency programmes:** identifying, investing and implementing energy reduction programmes through established Scope 1 efficiency projects, upgrading to equipment with higher efficiencies and optimising settings including introducing waste recovery.
- **Energy transition programmes:** our renewable electricity procurement strategy, including long-term PPAs secured with BNZ in Portugal, commencing in 2026 for 12 years is intended to deliver 146 GWh of renewable electricity certificates annually. Together with renewable electricity procurement across all regions, this will provide the step change required to achieve 100% renewable electricity by 2030.

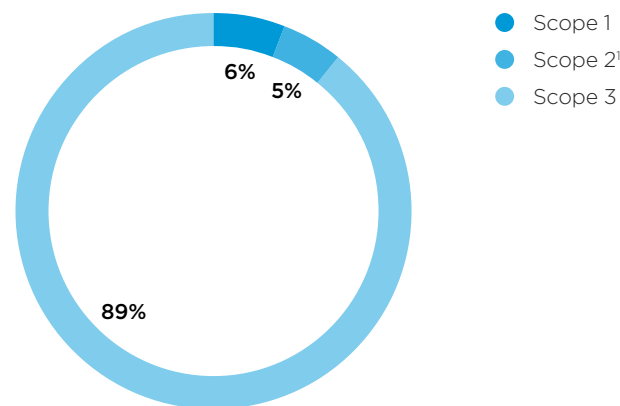
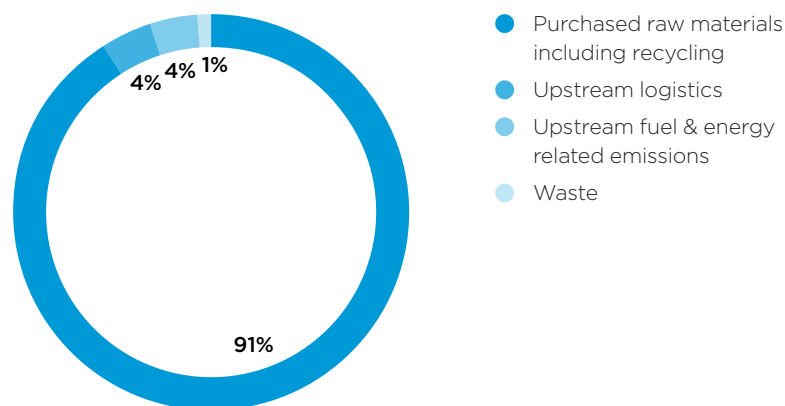
➔ **For decarbonisation roadmap see page 29**

- As part of our climate transition roadmap, AMP has implemented a PCF model that translates our verified Scope 1, 2 and 3 GHG inventory into customer-specific, cradle-to-gate product footprints. The model provides carbon data at the level of individual can sizes, product specifications and manufacturing facilities, improving transparency and enabling more informed decision-making than aggregated estimates. This capability supports the identification and tracking of decarbonisation levers across circularity, energy sourcing and lightweighting and strengthens AMP's ability to monitor progress, engage customers and inform future transition actions.
- We have established targeted innovation programmes as part of the decarbonisation roadmap, supported by investment in breakthrough technologies, including Uni-alloy. This technology has progressed from concept to scalable deployment readiness and is intended to enable higher recycled content in both can bodies and ends as it is adopted by customers. By enabling material efficiency and circularity at scale, these initiatives are expected to support a measurable reduction in AMP's Scope 3 emissions and to contribute to progress towards our 2030 climate targets.

Progress against AMP's 2030 targets is monitored through internal performance tracking and is reported in the Metrics and Targets section of this chapter.

Composition of emissions (level below decarbonisation roadmap progress)

GHG EMISSIONS 2025

2025 SCOPE 3 BY EMISSIONS - CATEGORY tCO₂e (M TONNES)

SCOPE 1 REPRESENTS

54%

of AMP's total annual absolute Scope 1 and 2 emissions

SCOPE 2 ACCOUNTS FOR

46%

of AMP's total annual absolute Scope 1 and 2 emissions

¹ Market-based emissions



E1 CLIMATE CHANGE CONTINUED



AGP APPROACH

AGP has set ambitious SBTi approved targets to reduce absolute Scope 1, 2 and 3 GHG emissions by 2030, against a 2020 baseline in 2025, absolute Scope 1 and 2 emissions decreased year-on-year by 1%. This reflects continued execution of AGP's renewable electricity programme in addition to continued footprint optimisation.

Implementation during the period included:

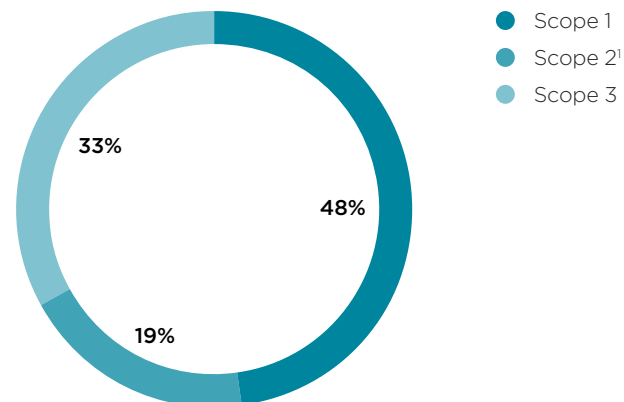
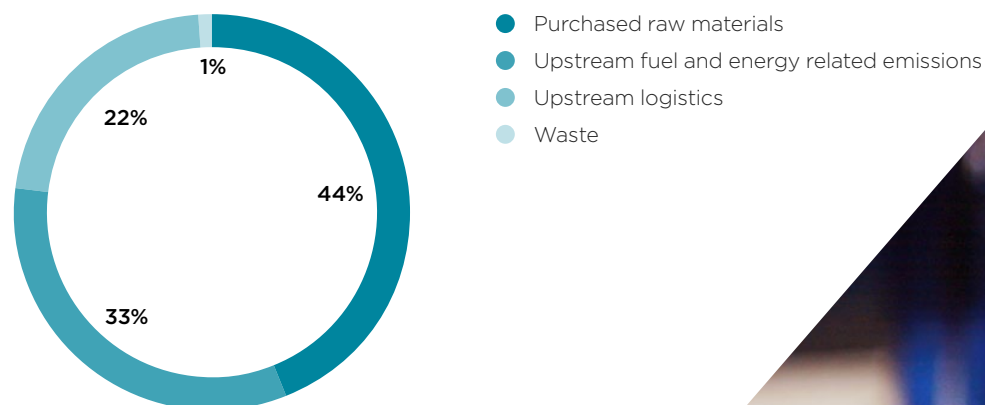
- Continued optimisation and operational stabilisation of the NextGen hybrid furnace in Obernkirchen, Germany
- Continued evaluation and operational integration of hydrogen production and use at the Limmared facility in Sweden
- Continued investment in recycled glass availability and quality to support emissions reductions across the value chain.

Progress against AGP's 2030 targets is monitored through internal performance tracking and is reported in the Metrics and Targets section of this chapter.

➔ **For decarbonisation roadmap see [page 29](#)**

Composition of emissions (level below decarbonisation roadmap progress)

GHG EMISSIONS 2025

2025 SCOPE 3 BY EMISSIONS - CATEGORY tCO₂e (M TONNES)

¹ Market-based emissions



E1 CLIMATE CHANGE CONTINUED

Identification of climate-related risks

E1-2-13 to 16

The identification and assessment of climate-related impacts, risks and opportunities are informed by Ardagh Group's double materiality assessment. Climate-related oversight is exercised at Board-level, initially through the Sustainability Committees, which has primary responsibility for overseeing climate and broader sustainability matters.

Climate-related risk management is embedded within Ardagh Group's ERM framework, which integrates climate and sustainability risks into a multidisciplinary risk assessment process. The ERM Committee oversees risk management activities across Ardagh and reports to the Audit Committee, ensuring that climate-related risks are identified, assessed and managed consistently alongside other enterprise risks.

Ardagh Group has identified a portfolio of climate-related risks and opportunities across the short, medium and long-term. Risks include – transition drivers, such as tightening regulatory requirements, energy price volatility and future emissions compliance obligations – that pose potential operational and financial pressures, while physical hazards including heat and extreme weather events may disrupt operations, constrain production capacity and affect supply chain reliability.

In parallel, Ardagh Group sees material opportunities in circularity and lower-carbon technologies: increasing the use of recycled raw materials alongside targeted investments in lower-carbon technologies, process efficiency and renewable energy procurement.

Collaboration across the value chain through supporting recycling initiatives with suppliers and customers further accelerates decarbonisation and supports evolving customer and regulatory expectations.

These risks and opportunities span all time horizons and are integral to Ardagh Group's growth strategy and long-term competitiveness.





E1 CLIMATE CHANGE CONTINUED

Resilience in relation to climate change

E1-3-17, 18

Ardagh Group recognises that climate change presents both transition and physical risks that may affect the resilience of its business model and strategy over the short, medium and long-term. Ardagh Group assesses resilience in the context of its climate transition plan, decarbonisation roadmaps, asset profile and capital allocation processes, as described in the Strategy section of this chapter.

Transition risk resilience

Ardagh Group's resilience to transition risks is assessed through its transition planning and scenario modelling processes, which consider the potential impacts of evolving climate-related regulation, carbon pricing, energy market developments, technology availability and customer demand. The decarbonisation levers and assumptions underpinning the transition plan, including reliance on recycled material availability, access to lower-carbon energy and technology maturity, are central to these assessments.

At both AMP and AGP, transition risk considerations are incorporated into strategic planning and capital decision-making processes. These include evaluating exposure to carbon pricing mechanisms in relevant jurisdictions, assessing sensitivity to changes in energy costs and recycled material availability and considering the implications of regulatory developments affecting packaging materials and manufacturing processes. This approach is intended to support the resilience of the strategy under increasingly stringent transition pathways.

Physical risk resilience

Ardagh Group also considers physical climate risks, including acute and chronic impacts such as extreme weather events, heat stress, water availability constraints and potential disruption to energy supply and logistics networks. These risks are assessed through existing ERM processes and inform operational planning, asset management and capital investment decisions.

Long-life manufacturing assets, including glass furnaces, are evaluated during rebuild cycles to incorporate design features and technologies that support long-term operational resilience. Where feasible, diversification of energy sources, improvements in energy efficiency and enhanced monitoring and control systems are used to reduce vulnerability to physical climate impacts over time.

Scenario modelling and long-term alignment

AMP and AGP use internal scenario modelling and emissions projections to assess how different production, energy and material assumptions may affect emissions trajectories, risk exposure and strategic resilience over time. These analyses consider factors such as business growth, asset lifecycles, regional energy transition pathways and recycled material availability.

Scenario modelling outcomes are used to inform strategic discussions, capital planning and prioritisation of decarbonisation levers, rather than to predict specific outcomes. While long-term climate objectives beyond 2030 continue to be evaluated, the current focus remains on delivering the approved transition plan and maintaining strategic flexibility under a range of plausible future conditions.

Strategic outlook

Based on current transition planning, governance arrangements and scenario analysis, Ardagh Group considers that its strategy has been designed to remain adaptable under evolving climate-related risks and regulatory environments. Ardagh Group recognises that delivering emissions reductions over time is becoming increasingly complex due to tightening regulatory requirements, evolving energy and materials markets and increasing methodological expectations associated with GHG accounting and target-setting frameworks, alongside the technical and capital constraints of long-lived manufacturing assets.

In this context, ongoing evaluation of climate-related assumptions, external developments and operational performance is used to inform adjustments to strategy and investment priorities, while maintaining financial discipline and business continuity.



E1 CLIMATE CHANGE CONTINUED

Impact risk and opportunity management

Policies related to climate change mitigation and adaptation

E1-4-19

Ardagh Group manages climate-related impacts, risks and opportunities through a set of Group-level policies and governance frameworks that support the implementation of its climate transition plan and decarbonisation roadmaps. These policies establish expectations for energy use, emissions reduction, resource efficiency and supplier engagement and are applied across AMP and AGP, subject to local regulatory and operational requirements.

Climate-related risks, including transition and physical risks, are addressed within Ardagh Group's ERM Policy and Framework. The ERM framework provides a structured approach for identifying, assessing and managing material risks, including those related to climate change, and informs strategic planning, capital allocation and operational decision-making.

Ardagh Group's Environmental Policy supports the achievement of its climate and environmental objectives, including reductions in GHG emissions, energy consumption, waste and water use. The policy sets out

expectations for compliance, continuous improvement and responsible environmental management and is referenced within Ardagh Group's Code of Conduct.

Climate-related expectations within the value chain are addressed through Ardagh Group's Responsible Procurement Policy, which sets out requirements for suppliers to engage in emissions reduction efforts, identify energy-saving opportunities and, where feasible, transition toward lower-carbon energy sources. The policy also encourages collaboration with suppliers on initiatives that support emissions reductions and resource efficiency.

Together, these policies provide the framework through which climate change mitigation and adaptation considerations are embedded into governance, risk management and operational processes. The effectiveness and ongoing relevance of climate-related policies are reviewed periodically to reflect evolving regulatory requirements, market conditions and strategic priorities.





E1 CLIMATE CHANGE CONTINUED

Actions and resources in relation to climate change mitigation and adaptation

E1-5-20, 21

Ardagh Group implements climate change mitigation actions through operational, technological and value chain initiatives aligned with its climate transition plan and decarbonisation roadmaps. Actions are prioritised based on emissions reduction potential, technical feasibility, economic viability and alignment with existing governance and capital allocation processes.

Across both AMP and AGP, key categories of mitigation actions include:

- **Energy efficiency and process optimisation**

Implementation of efficiency measures across manufacturing operations, including equipment upgrades, process improvements and optimisation of operating parameters, to reduce energy consumption and associated emissions.

- **Lower-carbon energy sourcing**

Actions to increase the use of lower-carbon electricity and reduce reliance on fossil-based energy sources, where feasible, including renewable electricity procurement and the evaluation of alternative energy solutions for thermal processes.

- **Material efficiency and circularity**

Actions to reduce material use and increase recycled content in aluminium and glass packaging, thereby lowering upstream emissions associated with virgin material production and supporting circular economy outcomes.

- **Technology development and deployment**

Development, testing and deployment of lower-carbon and hybrid technologies within existing asset lifecycles, including furnace-related innovations and energy system integration, to enable emissions reductions over time.

- **Value chain engagement**

Engagement with suppliers, customers and industry partners to support emissions reductions across the value chain, including collaboration on recycled material availability, logistics efficiency and technology development.

Business specific implementation

AMP

AMP's climate change mitigation actions focus on reducing GHG emissions across its operations and value chain through operational improvements, technological innovation, circularity and data-driven decision-making. These include:

- sustained operational efficiency improvements across facilities, complemented by long-term investments in lower-carbon technologies.
- reducing VOC emissions through a combination of targeted equipment upgrades, robust maintenance of RTOs and process innovations, including the use of alternative coatings.
- continued investments in processes enabling higher recycling across facilities, and reductions in raw material use driven by collaborative design initiatives, including lightweighting and downgauging.
- advancing breakthrough technologies, such as Uni Alloy, removes the alloy material constraint on can ends, enabling a highly circular aluminium solution with recycled content levels of up to ~98%, improving material performance and supports lower emissions product solutions.
- the development and deployment of our product PCF model to provide enhanced transparency and visibility of emissions performance across the value chain to prioritise decarbonisation actions, enabling more informed capital allocation and prioritisation of decarbonisation actions.

AGP

At AGP, mitigation actions are centred on energy-intensive glass manufacturing processes and longlife furnace assets. Actions include improving furnace efficiency, increasing cullet use, advancing lower-carbon furnace technologies and integrating lower-carbon energy sources where technically and economically feasible. These actions are implemented primarily within scheduled asset rebuilds and operational improvement programmes.

- continued investments in energy efficiency projects across facilities, such as lighting compressor upgrades and conventional furnace rebuilds.
- implementation and expansion of our renewable electricity projects pipeline.
- continued investment and partnership in glass collection and recycling capabilities across geographies.
- advancing breakthrough technologies such as NextGen hybrid furnace in Obernkirchen, Germany, in addition to alternative fuels production piloted with our hydrogen electrolyser in Limmared, Sweden.
- the advancement and implementation of our PCF model to provide enhanced transparency and visibility of emissions performance across the value chain to prioritise decarbonisation actions and enable more informed capital allocation.

E1 CLIMATE CHANGE CONTINUED

Metrics and targets

Targets related to climate change

E1-6-22, 23

Ardagh Group has established near-term GHG emissions reduction targets covering Scope 1, Scope 2 and relevant Scope 3 emissions. These targets are based on a 2020 baseline

year and were approved by the SBTi as aligned with limiting global warming to 1.5°C for Scope 1 and Scope 2 emissions and 2.0°C for Scope 3 emissions.

AMP

FIG. AMP SCOPE 1 AND 2 DECARBONISATION PROGRESS

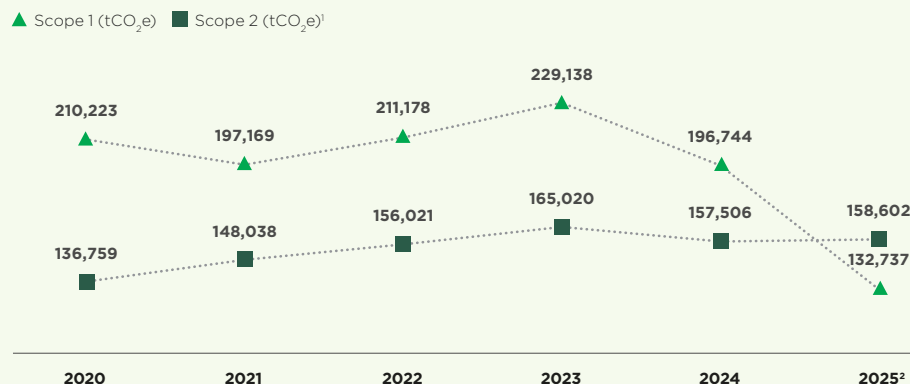
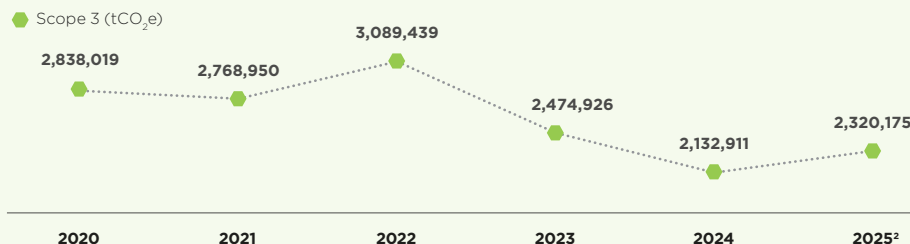


FIG. AMP SCOPE 3 DECARBONISATION PROGRESS



AGP

FIG. AGP SCOPE 1 AND 2 DECARBONISATION PROGRESS

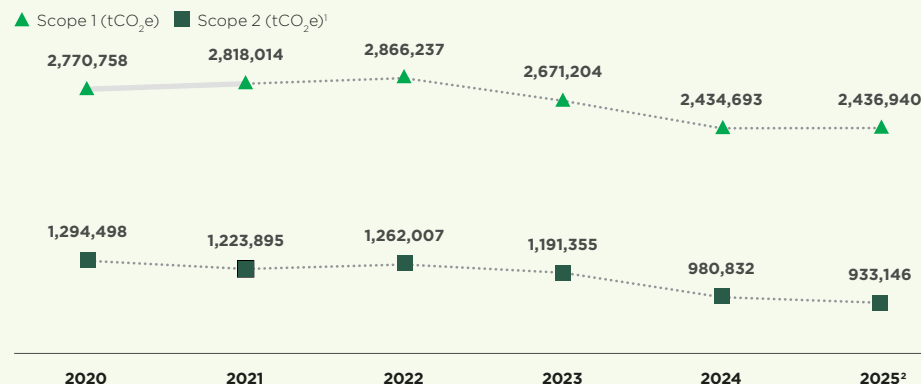
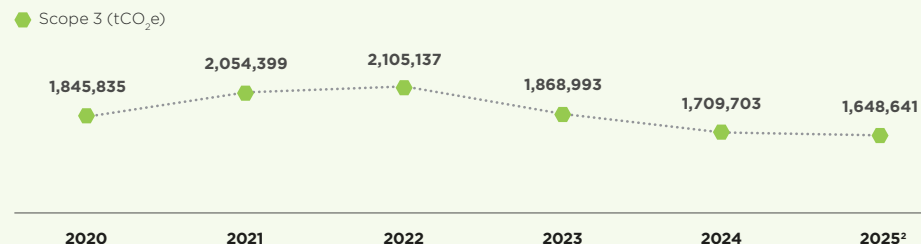


FIG. AGP SCOPE 3 DECARBONISATION PROGRESS



¹ Market-based emissions

² Independently assured by ERM CVS



E1 CLIMATE CHANGE CONTINUED

SBTi approved near-term targets (to be achieved by 2030)

Ardagh Group's SBTi approved targets are absolute emissions reduction targets and apply globally across 100% of Ardagh Group's operational control boundary.

- **Scope 1 and Scope 2:**
Absolute reduction of **42%** in combined Scope 1 and Scope 2 GHG emissions by 2030, compared to a 2020 baseline.
- **Scope 3:**
Absolute reduction of **12.3%** in Scope 3 GHG emissions by 2030, compared to a 2020 baseline, covering relevant and material value chain categories as defined in Ardagh Group's GHG inventory.

The combined Scope 1 and Scope 2 target includes emissions from stationary combustion, mobile combustion, process emissions and purchased energy. The Scope 3 target applies to those categories determined as material to Ardagh Group's emissions profile in accordance with the GHG Protocol and SBTi criteria.

Target development and methodologies

Ardagh Group's near-term targets were developed and validated in accordance with SBTi requirements using the Absolute Contraction approach. The Scope 1 and Scope 2 combined target and the Scope 3 target are absolute emissions reduction targets set in line with SBTi criteria.

In developing these targets, we considered projected business growth, anticipated regulatory developments, expected changes in energy and materials markets, technological development pathways and the availability of lower-carbon energy and recycled materials. These assumptions inform Ardagh Group's emissions trajectory and transition planning.

Supporting operational targets

In addition to GHG emissions reduction targets, Ardagh Group has established operational targets that support delivery of its climate objectives:

- **Renewable electricity:**
Target to source 100% renewable electricity
- **VOC emissions intensity (AMP only):**
Target VOC intensity reduction of 10%

Ardagh Group has also established resource efficiency targets under its broader environmental strategy, including water intensity reduction and ZWTL targets, which contribute indirectly to emissions reductions.

Monitoring and assurance

Progress against climate-related targets is monitored through internal performance tracking systems and governance processes. Emissions data and progress toward targets are subject to third-party verification. Baseline emissions data are from the 2020 reporting year.





E1 CLIMATE CHANGE CONTINUED

Energy consumption and mix

E1-7-24 to 27

		AMP		AGP		Ardagh Group	
	Unit	2024	2025	2024	2025	2024	2025
Energy consumption							
Fuel consumption from coal and coal products	MWh	N/A	N/A	N/A	N/A	N/A	N/A
Fuel consumption from crude oil and petroleum products	MWh	4,012	3,456*	640,038	543,380*	644,050	546,836*
Fuel consumption from natural gas ³	MWh	775,441	781,558*	8,730,893	8,558,213*	9,506,334	9,339,771*
Fuel consumption from other fossil sources	MWh	N/A	N/A	N/A	N/A	N/A	N/A
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources ¹	MWh	636,152	491,411*	1,982,132	1,775,402*	2,618,284	2,266,813*
Total energy consumption from fossil sources	MWh	1,415,605	1,276,425*	11,353,063	10,876,995*	12,768,668	12,153,420*
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources ²	MWh	269,874	431,367*	541,189	579,884*	811,063	1,011,252*
Consumption of self-generated electricity and non-fossil fuel energy	MWh	1,762	1,901*	17,186	16,931*	18,948	18,833*
Share of renewable sources in total electricity consumption	%	30%	47%*	22%	25%*	24%	31%*
Total energy consumption from renewable sources	MWh	271,636	433,268*	558,375	596,816*	830,011	1,030,084*
Total energy consumption from nuclear source	MWh	NA	180,427	NA	373,817	NA	554,243
Total energy consumption (thermal and electricity)	MWh	1,687,241	1,709,693*	11,911,438	11,473,811*	13,598,679	13,183,504*

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

² Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources includes fully renewable facilities only. (AGP only)

³ For our reporting this includes also LNG (AGP only)

* Independently assured by ERM CVS

Energy Production (on-site)

E1-7-27

		AMP		AGP		Ardagh Group	
	Unit	2024	2025	2024	2025	2024	2025
Non-renewable energy production (on-site)	MWh	N/A	N/A	23,302	15,343*	23,302	15,343*
Renewable energy production (on-site)	MWh	1,762	1,901*	17,186	12,069*	18,948	13,969*

* Independently assured by ERM CVS



E1 CLIMATE CHANGE CONTINUED

Energy Intensity

	Unit	AMP		AGP		Ardagh Group	
		2024	2025	2024	2025	2024	2025
Total energy consumption per net revenue	MWh/Mio US \$	344	311	2,815	2,798	1,488	1,374
Total energy consumption per tonnes packed	MWh/MT packed goods	N/A	N/A	2.1	2.1	N/A	N/A
Total energy consumption per 1000 can body (pieces ¹)	kWh/1000 pcs	34.9	34.6	N/A	N/A	N/A	N/A

¹ Includes data only for can body plants (4 can end plants + 1 hybrid plant with its can end production are excluded)

Gross Scope 1, 2, 3 and total GHG emissions

E1-8-28 to 30

	Unit	AMP		AGP		Ardagh Group	
		2024	2025	2024	2025	2024	2025
Breakdown of GHG emissions							
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	N/A	N/A	47%	45%	44%	43%
Scope 1 GHG emissions	MT CO ₂ e	157,506	158,602*	2,434,693	2,436,940*	2,592,199	2,595,541*
Scope 2 GHG emissions – location-based	MT CO ₂ e	254,275	260,617*	1,051,857	1,002,888*	1,306,132	1,263,506*
Scope 2 GHG emissions – market-based	MT CO ₂ e	196,744	132,737*	980,832	933,146*	1,177,576	1,065,883*
Scope 3 category 1 – purchased goods and services	MT CO ₂ e	1,931,416	2,113,521*	714,935	726,532*	2,646,351	2,840,053*
Scope 3 category 3 – fuel and energy related activities	MT CO ₂ e	93,202	88,061*	582,559	543,553*	675,761	631,614*
Scope 3 category 4 – upstream transportation and distribution	MT CO ₂ e	97,839	103,622*	391,009	357,070*	488,848	460,692*
Scope 3 category 5 – waste generated in operations	MT CO ₂ e	10,455	14,971*	21,200	21,487*	31,655	36,458*
Scope 3 GHG emissions – total of reported categories	MT CO ₂ e	2,132,911	2,320,175*	1,709,703	1,648,642*	3,842,614	3,968,817*
Direct biogenic CO₂ emissions from the combustion or biodegradation of biomass (separately from scope 1 GHG emissions)	MT CO ₂ e	N/A	N/A	N/A	N/A	N/A	N/A
Carbon credits purchased	MT CO ₂ e	N/A	N/A	N/A	N/A	N/A	N/A
Total GHG emissions derived from location-based method	MT CO ₂ e	2,544,692	2,739,394	5,196,254	5,088,469	7,740,945	7,827,864
Total GHG emissions derived from market-based method	MT CO ₂ e	2,487,161	2,611,514	5,125,228	5,018,727	7,612,389	7,630,241

* Independently assured by ERM CVS



E1 CLIMATE CHANGE CONTINUED

GHG Intensity based on net revenue

	Unit	AMP		AGP		Ardagh Group	
		2024	2025	2024	2025	2024	2025
Total GHG emissions intensity – location-based per net revenue	MT CO ₂ e/Mio US \$	518	498	1,228	1,241	847	816
Total GHG emissions intensity – market-based per net revenue	MT CO ₂ e/Mio US \$	507	475	1,211	1,224	833	795

GHG Emissions intensity on production

	Unit	AMP		AGP	
		2024	2025	2024	2025
Total GHG emissions intensity – location-based per tonnes packed	MT CO ₂ e/MT packed goods	N/A	N/A	0.93	0.94
Total GHG emissions intensity – market-based per tonnes packed	MT CO ₂ e/MT packed goods	N/A	N/A	0.92	0.92
Total GHG emissions intensity – location-based per 1000 can body (pieces ¹)	kgCO ₂ e/1000 pcs	38.6	43.2	N/A	N/A
Total GHG emissions intensity of can body – market-based per 1000 can body (pieces ¹)	kgCO ₂ e/1000 pcs	37.1	40.8	N/A	N/A

1 Includes data only for can body plants (4 can end plants + 1 hybrid plant with its can end production are excluded)



E1 CLIMATE CHANGE CONTINUED

Internal carbon pricing

E1-10-35, 36

Ardagh Group integrates carbon-related considerations into its strategic planning and investment evaluation processes but does not currently apply a uniform Group-wide internal carbon pricing mechanism. Carbon pricing assumptions are used selectively to assess exposure to regulatory developments and to inform scenario analysis, rather than as a direct input into financial statement impairment testing or asset valuation.



While AMP does not apply an internal carbon pricing mechanism for strategic decision-making, it prioritises investments based on abatement costs. As AMP does not currently face material direct carbon pricing risk, capital and operational investment decisions are guided by emissions avoidance rather than an explicit carbon cost. This approach is designed to remain resilient across a range of potential transition scenarios, including those involving stricter carbon constraints and rising customer demand for lower-carbon solutions.

AMP also considers how future policy developments may indirectly affect input costs and market dynamics, including through energy prices, aluminium sourcing and regional regulatory differences. These factors are continuously assessed to inform and strengthen strategic decision-making.



AGP operates in jurisdictions subject to emissions trading schemes, including the EU Emissions Trading System, California Cap-and-Invest Program (formerly Cap-and-Trade Program) and the UK Emissions Trading Scheme, and meets the applicable thresholds for participation in these schemes. It considers prevailing market-based carbon pricing signals when evaluating decarbonisation investments and conducting scenario analysis. In jurisdictions without established carbon pricing mechanisms, AGP applies conservative internal planning assumptions to assess potential regulatory risk exposure and investment resilience.

Carbon-related assumptions used by AGP are applied as part of a broader strategic and financial assessment framework and are not used as standalone decision criteria. These assumptions inform planning and prioritisation but do not directly drive capital allocation or financial statement outcomes.

Anticipated financial effects

E1-11-37 to 41

At this stage, Ardagh Group has not disclosed quantified estimates of the anticipated financial effects of material climate-related risks and opportunities. Ardagh Group has undertaken internal analysis to inform strategic planning and capital allocation decisions, including assessment of the potential cost implications associated with its climate transition plan.

However, the financial impacts of climate-related factors remain subject to material uncertainty and variability. As a result,

Ardagh Group does not currently believe that quantitative estimates would provide sufficiently reliable information for external disclosure.

Climate-related financial considerations continue to be integrated into governance, planning and investment processes, and Ardagh Group will reassess the scope and depth of quantitative disclosure in future reporting periods as methodologies mature and underlying assumptions stabilise.





E1 CLIMATE CHANGE CONTINUED

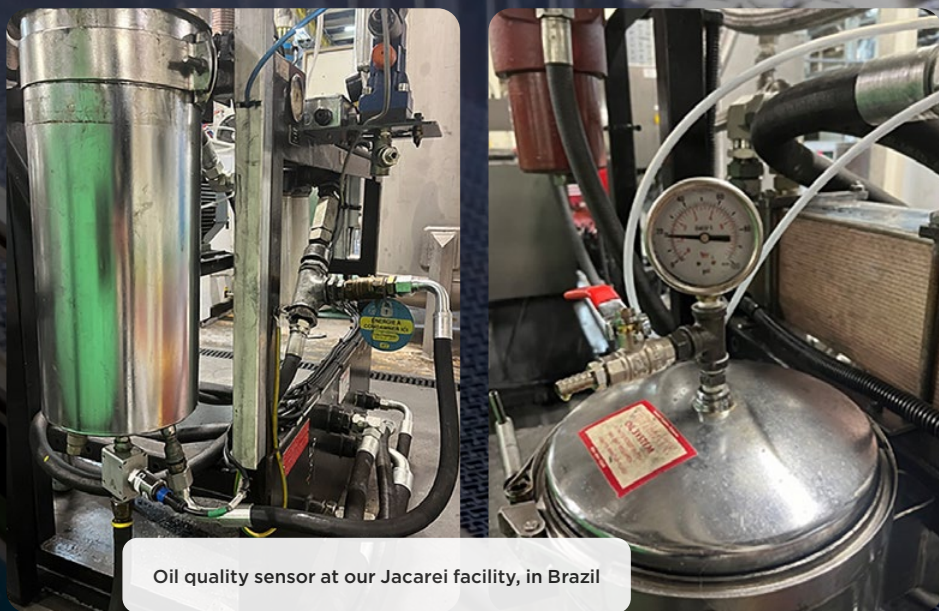
SPOTLIGHT ON AMP

Plant of the Future

We are defining the next generation of manufacturing as we transition toward a low-carbon, digitally-enabled future. At the centre of this is our Plant of the Future (POF) programme – a global initiative to weave automation, intelligent systems and advanced technologies into the fabric of our operations. This is more than just an upgrade: it's a fundamental shift in how we think, work and manufacture.

POF is intended to be a powerful accelerator of decarbonisation. Its fast-track energy-efficient and lower-emission technologies are helping us reshape processes that have historically driven carbon output.

Just as importantly, POF is building the digital backbone we need for accurate, real-time climate reporting. Standardised platforms that integrate metering, energy-use tracking and emissions monitoring are strengthening the data foundations for disclosures. They also improve visibility and performance across critical equipment – including ovens, boilers, regenerative thermal oxidisers (RTO) and compressed air systems – which help drive operational efficiency and governance and transparency standards.



Oil quality sensor at our Jacarei facility, in Brazil



E1 CLIMATE CHANGE CONTINUED

SPOTLIGHT ON AGP-AFRICA & AGP-EUROPE

Piloting new technologies

Five new Smart Trucks in South Africa are showing what cleaner, smarter logistics look like. These latest upgrades to the AGP fleet feature advanced safety systems, increased capacity and dual fuel engines that run on both diesel and compressed natural gas. They can potentially reduce carbon emissions per pallet shipped as well as safer journeys and lighter impact on the roads.

They also carry a touch of nostalgia, subtly echoing AGP Africa's much-loved 2016 advert featuring the iconic Consol preserve jar. Past pride meeting future ambition.

In the UK, AGP-Europe's Knottingley facility has completed a pioneering biofuel trial in its glass melting furnace. Supported by the UK Government's Net Zero Innovation Portfolio and led by Glass Futures, experts from the glass and ceramics industries came together to explore whether liquid bioderived fuels could fully replace natural gas. The seven-day trial saw 4.1 million glass containers produced while reducing CO₂ emissions by 242 tonnes, demonstrating that low carbon glass can be made at commercial scale without sacrificing quality or efficiency.

242 tonnes
reduction in CO₂ emissions through
biofuel trial in AGP-Europe



Innovation in motion – Smart Trucks deliver higher efficiency



E2 Pollution

At Ardagh Group we implement and support pollution prevention measures relating to air, water and soil. Each manufacturing facility is certified to ISO 14001 – and assesses itself against the Ardagh Group BGreen7 standards – to reduce environmental risks, mitigate the risk of environmental incidents and control and reduce environmental impact.

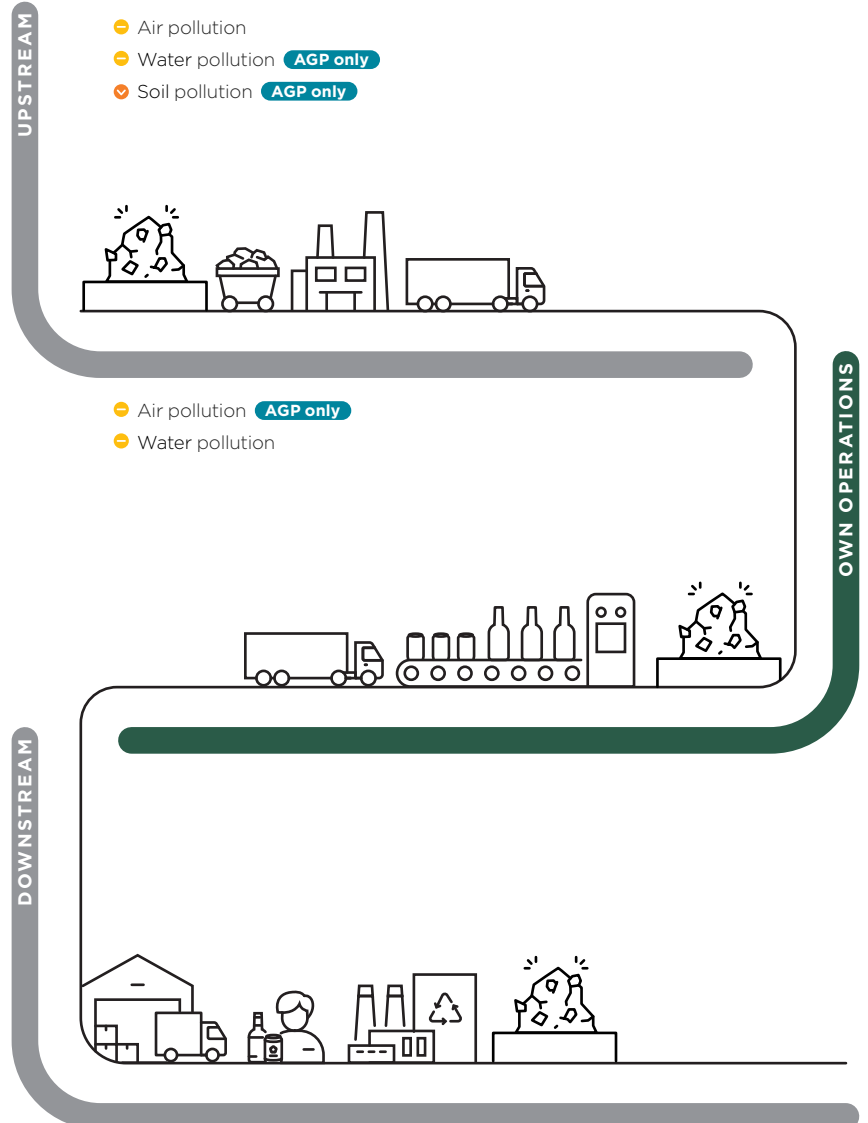
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive – Negative

Financial materiality

+ Opportunity – Risk





E2 POLLUTION CONTINUED

Impact, risks and opportunities

IRO type

Positive
 Negative
 Opportunity
 Risk

Entity

GROUP Ardagh Group
 AMP Ardagh Metal Packaging
 AGP Ardagh Glass Packaging

Value chain stage

U Upstream
 O Own operations
 D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Pollution of air				
Air pollution	Air emissions generated from metal manufacturing processes in the upstream value chain, could lead to the release of pollutants that could contribute to environmental degradation.		AMP	U
	Air emissions generated from glass manufacturing processes (e.g. sand mining) in the upstream value chain and own operations, could lead to the release of pollutants that could contribute to environmental degradation.		AGP	U O
Pollution of water				
Water pollution	Water used in manufacturing processes becoming contaminated in own operations, could lead to water pollution and associated environmental impacts if discharged untreated.		AMP	O
	Water used in manufacturing processes becoming contaminated in the upstream value chain and own operations, could lead to water pollution and associated environmental impacts if discharged untreated.		AGP	U O
Pollution of soil (and respective loads)				
Soil pollution	Soil pollution arising from upstream and own operation activities, could lead to land degradation and reduced ecosystem quality, resulting in regulatory sanctions, remediation costs and restrictions on future land use.		AGP	U



E2 POLLUTION CONTINUED

Impact, risk and opportunity management

Policies related to pollution

E2-1-10

In March 2024 we published our revised Environmental Policy, setting out Ardagh Group's responsibility to natural resources and committing 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 operations on the environment
- Ensure good environmental practices and continuous improvement through environmental management systems in our factories

Our Responsible Procurement Policy sets clear expectations for responsible practices across our upstream value chain, including:

- Adherence to legal requirements
- Annual completion of an environmental risk assessment, to evaluate environmental impacts, risks and opportunities
- An established programme for preventing pollution e.g. water use, CO₂ emissions
- Sustainable use of resources, including the use of recycled content
- Appropriate collection and disposal of waste that must be managed with authorised service providers

- The requirement to manage all chemicals responsibly, including controlling the exposure of humans and the environment to hazardous chemicals; eliminating carcinogenic, mutagenic or toxic for reproduction substances (CMR substances), EU/UK Substances of Very High Concerns (SVHC) and Substances of High Concern (SHC) delivered to Ardagh Group; ensuring that all products are registered and approved with EU REACH and other applicable legal requirements
- Periodic environmental assessments carried out in our facilities to evaluate environmental impacts, risks and opportunities

Our policies and procedures aimed to prevent pollution, mitigate risk and ensure emergency preparedness are aligned with ISO 14001. Under this standard, environmental risks that could cause significant impact to require defined operational controls and mitigation measures to prevent or reduce pollution. These requirements are implemented through our BGreen7 environmental management framework, which is built on four pillars: ISO 14001 certification; incident root cause analysis; corrective action planning; and integration into plans for capital and operational expenditure (CapEx and OpEx).

BGreen7 establishes minimum environmental policy requirements and operational controls across key impact areas, including air emissions, soil contamination, water consumption and wastewater discharge. The framework also promotes participation at facility-level in environmental risk assessments, implementation of operational controls and incident response activities. Performance and compliance are monitored through regular internal data reviews, incident reporting, facility self-assessments and periodic internal audits.





E2 POLLUTION CONTINUED

Actions and resources related to pollution

E2-2-11

Site screening

We operate key processes to identify pollution-related IROs in both our operations and our upstream and downstream value chain. Our emissions reduction measures cover a wide range of systems, such as combustion optimisation equipment, selective catalytic reduction technologies and filtration units or secondary containment technologies.

Employees are actively involved in implementing our pollution prevention measures relating to air, water and soil. Their experience and knowledge ensure our approach reflects operational realities, contributing to more effective 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 proactive measures across facilities and regions
- Periodic self-assessments against BGreen7 standards
- Facility 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

In line with ISO 14001, all manufacturing facilities evaluate the needs and expectations of interested stakeholders, including the interests of communities around our locations. These evaluations – together with the environmental aspects and impacts analyses – inform consultation with local communities.

Reducing impacts on natural resources

Compliance with regulatory requirements is non-negotiable for Ardagh Group. In 2024, we rolled out our BGreen7 standards, establishing a solid foundation to prevent environmental incidents, reinforcing active management and strengthening environmental responsibilities at all levels.

Every manufacturing facility is expected to complete a self-assessment describing how it manages and mitigates potential environmental impacts, including implementing environmental controls. The BGreen7 framework focuses on the most significant environmental impacts associated with our manufacturing processes, including pollution to air, soil and wastewater. BGreen7

follows ISO 14001's approach to managing environmental risks and opportunities, defining requirements designed to reduce pollution risks while supporting effective day-to-day environmental management.

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

Our primary activities – can and glass manufacturing – have limited direct impact on soil, as they do not involve agriculture, excavation or depositing substances on natural soil. The risk of soil contamination comes primarily through airborne emissions that settle on the ground, from wastewater or from waste handling. We manage these risks through compliance-based measures, including Spill Prevention Plans, secondary containment systems and following BGreen7 protocols. Specific incidents and risks are addressed through established Spill Response Plans. BGreen7 includes controls such as bunded tank containment, double-walled piping, monthly inspections, emergency spill procedures and containment systems for waste storage areas to prevent ground contact.

Regarding water, we focus on reducing water use, particularly in water-stressed areas and on managing pollutants in the water streams we control. BGreen7 defines our monitoring requirements for key water quality parameters, including a mandatory list of pollutants to be measured, particularly in locations where regulatory requirements or permit conditions are less stringent. Across our facilities, this includes parameters such as chemical oxygen demand (COD) and suspended solids. Facilities in Europe report water-related parameters in accordance with the European Pollutant Release and Transfer Register (E-PRTR). We also operate internal closed-loop and cascade water systems across our operations to reduce water withdrawals further,

We monitor water use at our facilities and look continuously to enhance daily monitoring practices and formalise immediate leakage checks when abnormal consumption is identified. Pollution prevention measures can include separate sewers (for rainwater, production wastewater and sanitary flows) and established 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. Monitored parameters include pH, total suspended solids (TSS), COD, hydrocarbons and fluoride.



E2 POLLUTION CONTINUED

Wastewater from manufacturing processes is treated on-site where applicable, then discharged in accordance with local regulations and agreements with municipal wastewater operators. Wastewater discharges, including from production and sanitary sources, are analysed across all facilities. Where local regulations are absent or less stringent, we apply internal pollutant thresholds defined in the BGreen7 Wastewater Standard.

Incidents and associated learnings are formally documented and shared across our network of facilities to support continuous improvement.

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 relevant employees receive appropriate training.

We have formal emergency preparedness and response procedures in facilities' Emergency Response Plans (ERP) or Emergency Preparedness Plans (EPP), aligned with ISO 14001. These include direction on 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 and improvement initiatives aim to reduce pollution through responsible material management, operational controls and compliance with environmental regulations. In Europe, we implement and follow Best Available Techniques (BAT) guidance and contribute to the development of future BAT standards relevant to our industries. All facilities comply with applicable environmental legislation and permit conditions governing potential pollutants.

Chemical substances are managed through our Standard Operating Procedure (SOP) for Chemical Substance Management and BGreen7 environmental standards, which define requirements for controlling and phasing out regulated substances, including ozone-depleting and fluorinated substances. SVHC, as defined by the European Union and comparable substances in other jurisdictions are prohibited from introduction and must be phased out across all facilities.

We manage operational pollution risks further through BGreen7 standards and compliance with local air, water, and waste permit conditions. We record and address any deviations from these requirements through the ARMS incident reporting system.

Our primary air emissions include NO_x, SO_x and VOC. To reduce these emissions, we implement combustion optimisation technologies to mitigate NO_x formation and deploy additional abatement systems, including selective catalytic reduction (SCR). SO_x and VOC emissions are monitored and managed through the same reporting and control framework, with further specific VOC abatement technology upgrades such as RTOs that destroy VOCs through high temperature oxidation, converting them into CO₂ and water. We also engage with suppliers to explore lower-emissions raw materials.





E2 POLLUTION CONTINUED

Metrics and targets

Targets related to pollution

E2-3-12

Ardagh Group's pollution-related targets are supported by ISO 14001 standards and our BGreen7 environmental management framework.

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

Current pollution-related targets include:

- **VOCs (AMP only):** reduce VOC emissions intensity by 10% by 2030 (from a 2020 baseline)
- **ZWTL:** achieve ZWTL status by 2025 for AMP manufacturing facilities and 2030 for AGP manufacturing facilities
- **Water:** achieve voluntary water withdrawal intensity reduction targets of 20% for AMP and 26% for AGP by 2030 (from a 2020 baseline)¹

These targets apply to all Ardagh Group-owned manufacturing facilities and do not extend to upstream or downstream value chain activities.

Related disclosures are provided in E1 Climate change, E3 Water and E5 Resource use and circular economy.

Internal governance documents contain all water-related commitments procedures and mandatory standards. In addition, Ardagh Group's current objective is to maintain continuous compliance with all applicable water discharge requirements across operations while progressively reducing discharge volumes and improving water quality through engineering controls and operational practices. For more information, see E3 Water.

Methodology and assumptions

We report VOCs on an intensity basis, measured as emissions per 1,000 units of finished can bodies and per net revenue. Waste is measured in absolute quantities by weight and by waste category. Performance is calculated using verified internal reporting platforms and protocols, including Tagetik ESG, 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 and investments

Progress is reviewed periodically and integrated into broader sustainability governance and performance management processes.

Performance is disclosed in this annual sustainability report. Emissions data are tracked through Tagetik ESG, which serves as the Group-wide reporting platform. Within this system, emissions are recorded, converted and harmonised to support consistent monitoring and comparability across facilities.

Although local norms and regulations vary across jurisdictions, we use qualified external consultants where needed to support sampling and assessment of potential pollutants. Our reporting system also includes standardised calculations, such as metric-to-imperial unit conversions, to maintain accuracy and comparability.

The Environmental Data Handbook defines reporting requirements for emissions and other environmental metrics. It sets out standardised units, formulas, calculation factors, source types and reporting guidance across production, waste, water, energy and air emissions.

Pollution of air

E2-4-13, 14

AMP pollution to air	Unit	2024	2025
VOC	Kg	2,733,461	2,703,167*

AGP pollution to air	Unit	2024	2025
NOx ²	Metric tonnes	6,146	6,295*
Particulates – PM10 ²	Kg	416,200	423,001*
SOx	Metric tonnes	4,321	5,965*

² Excludes AGP-Africa

* Independently assured by ERM CVS

¹ Our BGreen7 standards include internal levels of wastewater pollutants where stricter levels defined by regulations or permits are not present



E2 POLLUTION CONTINUED

SPOTLIGHT ON AMP

Lowering atmospheric emissions in South America

A new RTO at the Jacarei facility in Sao Paulo, Brazil has the potential to reduce the facility's VOC emissions by approximately 70%. The RTO breaks down VOC compounds, resulting in a significant lowering of atmospheric emissions, reducing the impact on air quality from our VOC emissions, strengthening regulatory compliance and supporting overall sustainability targets. This is the first such system in South America, bringing the facility into line with global industry best practice.

**70% potential
reduction**
of VOC emissions approximately¹

¹ Full-year forecast based on Jan–Apr 2026 VOC savings, extrapolated pro-rata versus 2025





E3 Water

Water management is critical for our business, our communities and our environment. The acceleration of climate change is placing increasing pressure on freshwater resources, making water stewardship essential not only for ecosystem resilience, but also for the long-term sustainability of our operations and the needs of our customers.

IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

+ Opportunity - Risk

UPSTREAM



- Water consumption **AGP only**
- Water management strategy
- Water scarcity

OWN OPERATIONS



DOWNSTREAM





E3 WATER CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Water use including withdrawal, consumption, discharges and storage				
Water consumption	High volumes of water consumption during manufacturing processes (such as cooling and cleaning) in the production stage of the value chain, could lead to increased pressure on local water resources and potentially contributing to water scarcity for surrounding communities and ecosystems.	-	AGP	O
Water management strategy	Implementing efficient water management strategies (e.g. recycling and conservation) and technologies, could lead to reductions in water consumption within the manufacturing process, resulting in lower operational costs through decreased resource use and strengthened reputational positioning as a responsible and resource-efficient manufacturer.	^	GROUP	O
Water scarcity	Increasing water scarcity driven by climate change, could lead to reduced water availability, higher resource procurement costs and constraints on production processes, resulting in financial impacts on operating costs, strategic risks to production capacity and continuity, and potential reputational harm related to environmental resource management.	v	GROUP	O





E3 WATER CONTINUED

Impact, risk and opportunity management

Policies related to water

E3-1-9, 10

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

We are developing and implementing a strengthened Water Strategy to improve water efficiency, aligned with CSRD (ESRS E3) expectations. Our approach is structured on four strategic pillars: Governance and standardisation; Measurement and consumption management; Efficiency, reuse and optimisation; and Risk mitigation and water resilience.

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 our ESG reporting tools for environmental data tracking and risk mitigation. Together, these systems guide a standardised approach across all facilities for water sourcing, consumption, discharge, reuse and pollution prevention.

BGreen7 establishes minimum environmental requirements at all our facilities. Periodic self-assessments reinforce these 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 all facilities, regardless of local water stress status.

We track monthly water consumption and discharges using data from smart meters, supplier invoices and facility-level registers, and all facilities maintain regulatory permits and documentation on wastewater discharge and treatment.

We use the World Resources Institute (WRI) Aqueduct Water Risk Atlas methodology to identify areas of current and future water-related risk. As of 2025, seven AMP facilities and 12 AGP facilities are located in regions of high or extremely high water-stress.

In response to the material water-related impacts and risks identified in Ardagh Group's IRO assessment, AGP has adopted a formal Water Policy aimed at minimising water-related environmental impacts, managing physical and regulatory water risks and improving water efficiency across operational facilities globally.

The policy articulates principles, governance structures and measurable commitments for responsible water management. It reinforces AGP's commitment to regulatory compliance, risk-based prioritisation of high water-stress locations, continuous improvement in water withdrawal intensity and discharge quality and protection of access to safe water, sanitation and hygiene (WASH) at all facilities.

Water-related risks in the upstream value chain are addressed through broader procurement standards.



E3 WATER CONTINUED

Water use, design and water-stressed areas

E3-2-11, 12

Water is a finite and essential resource, and we are committed to reducing water use across our operations. In 2025, our capital expenditure on water efficiency initiatives included investments in advanced water metering, recirculation systems and washer improvements to enhance operational efficiency and reduce withdrawal volumes. Facilities located in water-stressed areas are prioritised for capital investment in efficiency, recycling and reuse technologies.

Used process water is treated onsite or pre-treated prior to discharge to municipal treatment facilities or transported for authorised treatment. Wastewater quality is monitored regularly for parameters such as chemical oxygen demand (COD), total suspended solids (TSS), hydrocarbons, heavy metals and absorbable organic halides (AOX). Rainwater from higher-risk areas (e.g., rooftops and bulk material storage zones) is analysed at least biennially to test compliance and pollution prevention.

Infrastructure and operational controls are in place to prevent contamination, including separation of rainwater and wastewater flows, emergency spill response protocols and regular inspection and maintenance of sewer and containment systems. These measures reflect the minimum requirements established by BGreen7.

Water-related considerations are also built into product and manufacturing design. Efficiency initiatives such as light- or right-weighting of glass containers, including optimisation of our washing processes, together with continuous process optimisation, reduce operational water intensity. Pollution prevention and water management practices support ecosystem protection by minimising contaminants in runoff and wastewater, supporting the protection of local water environments. Ongoing monitoring enables the early identification of climate-related water stress and strengthens adaptive capacity.

Actions and resources related to water

E3-2-11, 12

These actions are designed to mitigate water-related operational risks and help achieve the Group's 2030 water withdrawal intensity targets.

Examples from across AGP and AMP include:

- **AGP-Africa (Bellville):** Replacement of a cooling tower system, expected to reduce annual water withdrawal by approximately 12,000 m³.
- **AGP-Europe (Germersheim):** Installation of water recirculation and cooling assets, reducing annual water withdrawal by approximately 120,000 m³.
- **AGP-North America (Bridgeton):** Installation of a cullet quench water recirculation system, estimated to reduce annual water withdrawal by approximately 180,000 m³.
- **AMP-South America (Jacarei):** Enhancements to the washer system, along with targeted optimisation of water-intensive washing operations and improved process control, have contributed to a 6% reduction in water intensity.
- **AMP-North America (Bishopville):** Introduction of enhanced automation for water control and optimised site-level water management is expected to save around 10,000 gallons of water per day.





E3 WATER CONTINUED

SPOTLIGHT ON AMP-SOUTH AMERICA

Water-saving innovations at Jacareí and Bishopville

The Jacareí facility in Brazil achieved water-saving through targeted upgrades to its washer systems. These innovations have reduced water withdrawal by 2%.

The key improvement was to the coalescer system, which increases water reuse by separating oil from water, which reduces contamination and means more water can be reused instead of freshwater in washer operations.

An upgraded chlorine dosing system also improves water efficiency by preventing organic buildup in wash baths, resulting in more consistent washer performance and lower water demand.

Jacareí also introduced technology to minimise contamination carryover between wash stages to decrease water consumption during continuous operation.

AMP's Bishopville facility installed automatic backflow valves between washer stages to regulate and stabilise water flow. The improved control improves washer performance and consistency while directly lowering freshwater withdrawals by 3.8% in 2025.

Outfeed for washer at our Jacareí facility, in Brazil



SPOTLIGHT ON AGP-EUROPE

Experimenting with system efficiency

Since the summer of 2025, the team at AGP's Nienburg facility in Germany has achieved daily water savings of approximately 5,700 litres by implementing a simple system review.

The team looked at existing water treatment systems, beginning with the cooling water circuits connected to the individual section machine used by the compressors and the scraper system in waste glass reclamation. These continuously monitor temperature and conductivity, automatically withdrawing fresh water to dilute minerals or lower the water temperature whenever either rises above its set limit.

The team realised that the systems could potentially operate safely at higher temperature and conductivity levels than previously assumed. Working with the engineering team and water treatment service provider, they designed a study to test the hypothesis that increasing the setpoints would not harm equipment or disrupt production. It proved to be the case and ongoing monitoring has validated the approach, showing no increase in corrosion rates and no negative impact on system performance.¹

Raising the setpoints means the systems now rely on far less fresh water withdrawal to maintain optimal conditions, with the savings equivalent to the daily use of 47 households in Germany¹, a clear example of how thoughtful adjustments to existing operations can deliver meaningful environmental benefits.

5,700 litres
of water saved daily through process changes

¹ Based on 122 litres per household in Germany per day ([Source](#))



E3 WATER CONTINUED

Metrics and targets

Targets related to water

E3-3-13

We have set 2030 voluntary water withdrawal intensity reduction targets across both operating businesses for all operational facilities, excluding joint ventures, against a 2020 baseline.

AMP aims to reduce water withdrawal intensity by 20%, calculated as cubic metres of water withdrawn divided by 1,000 units of finished goods (pieces). AGP targets a 26% reduction in water withdrawal intensity, calculated as cubic metres of water withdrawn divided by tonnes of finished goods (tons packed). These targets apply globally, regardless of water stress classification. No interim milestones have been established.

AMP has set a voluntary water withdrawal intensity reduction target of 20% by 2030 from a baseline year of 2020

AGP has set a voluntary water withdrawal intensity reduction target of 26% by 2030 from a baseline year of 2020

Water intensity remains a key focus area for AMP, but by the end of 2025 our water intensity increased by 2.7%.

This was due to product pack size mix and change in key facilities, where larger can sizes were being manufactured requiring a greatervolume of water for cleaning. It does however highlight the need to supplement and reinforce our efforts.

By the end of 2025, AGP had recovered from a regression in 2024, finishing the year approximately 3% better than the 2020 baseline, progressing to the 26% water intensity reduction target.

In 2025, the CDP awarded AMP an A- (Leadership level) score and AGP a B (Management level) score for water security.

Water metrics

E3-4-14, 15

We are committed to transparency and accountability in our sustainability efforts, and we recognise the importance of disclosing how our voluntary targets contribute to improving water quality.

Water withdrawal, consumption and intensity

AMP	Unit	2024	2025
Total water consumption	m ³	353,151	377,744*
Total water consumption per net revenue	m ³ /Mio US\$	72	69
Total water consumption in areas with water stress ¹	m ³	141,969	170,461*
Total water withdrawal	m ³	3,351,421	3,614,743*
Total water discharge	m ³	2,998,270	3,236,999*
Total water recycled and reused ²	m ³	-	-
Total water stored ²	m ³	-	-

AGP	Units	2024	2025
Total water consumption	m ³	1,374,553	2,110,813*
Total water consumption per net revenue	m ³ /Mio US\$	325	515
Withdrawals from water-stressed locations ¹	m ³	1,414,153	1,211,450*
Total water withdrawal	m ³	5,688,396	5,134,829*
Total water discharge	m ³	4,313,843	3,024,016*
Total water recycled and reused ²	m ³	-	-
Total water stored ²	m ³	-	-

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

² Data granularity not yet available

* Independently assured by ERM CVS



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 impact and depend on 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.

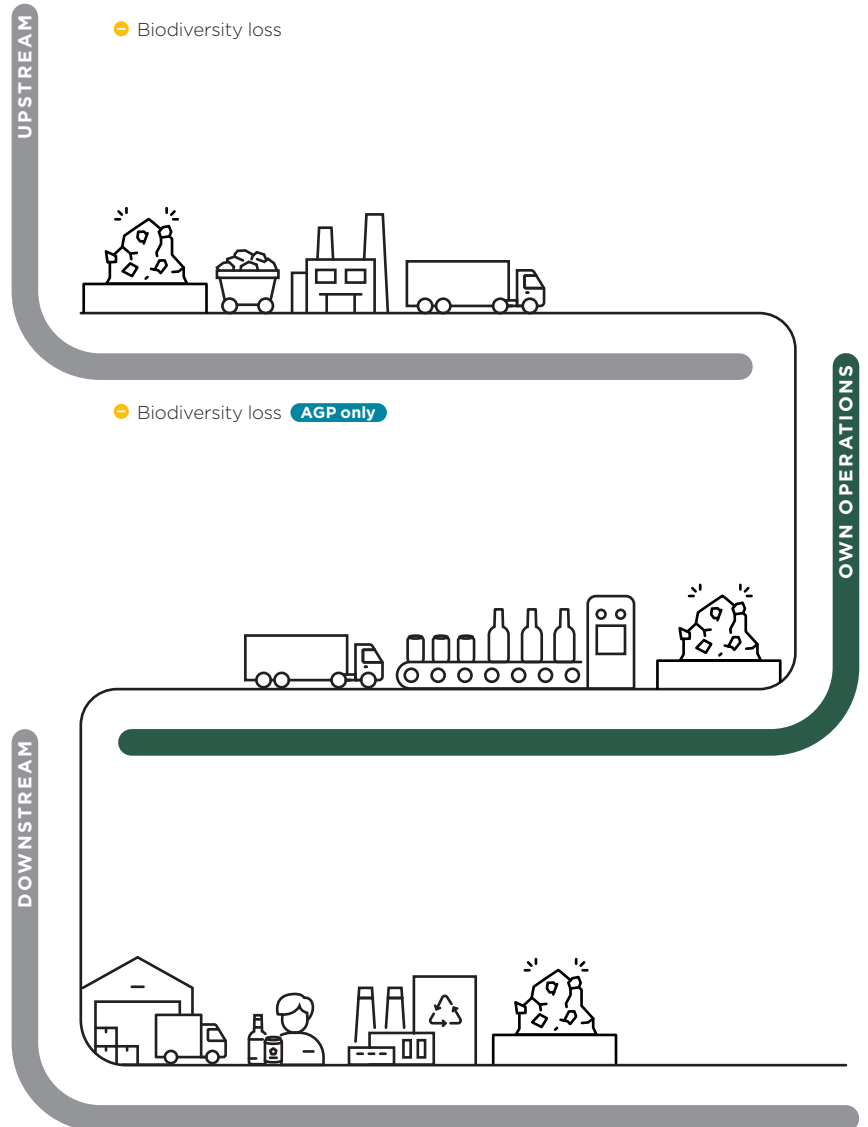
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

✔ Opportunity ✖ Risk





E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Direct impact drivers of biodiversity loss				
Biodiversity loss	Mining of virgin raw materials in the upstream value chain, could lead to soil contamination by heavy metals and hazardous substances, significant landscape alteration, land degradation and adverse effects on soil quality, ecosystems and surrounding communities.	-	AMP	U
	Mining of virgin raw materials in the upstream value chain and own operations, could lead to soil contamination by heavy metals and hazardous substances, significant landscape alteration, land degradation and adverse effects on soil quality, ecosystems and surrounding communities.	-	AGP	U O





E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

Impact, risk and opportunity management

Policies related to biodiversity and ecosystems

E4-2-11, 12

Through our DMA, we are building a knowledge base to inform our future policy for biodiversity, which we will tailor to our unique identified material IROs.

All our manufacturing operations are certified to ISO 14001 standard and follow Ardagh Group's environmental standards (BGreen7) which are designed to mitigate environmental impacts and potential impacts to biodiversity, especially those BGreen7 standards related to water use, wastewater, emissions and waste. See our progress to targets on [pages 4 and 5](#).

The Ardagh Group risk team has defined and developed corporate expectations and control standards and we maintain appropriate assurance controls, including regular compliance checks and annual management reviews, to ensure adherence to our Environmental Policy.

In future phases, we will be working closely with procurement teams to gain a greater understanding of our value chain and raw materials. Our actions and resources section shows how we will develop future policies where needed. Our disclosures in relation to E1 Climate change, E2 Pollution, E3 Water and E5 Resource use and circular economy outline how we minimise our impacts on the environment for these topics.





E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

Actions and resources related to biodiversity and ecosystems

E4-3-13, 14

Actions to date

In 2025, we undertook a four step process, as outlined in our [2024 Sustainability Report](#). The results identified facilities classified as "sensitive" by the Integrated Biodiversity Assessment Tool (IBAT) based on their distance to a Key Biodiversity Area (KBA) or Protected Area (PA), their habitat restoration potential (STARR) and species threat abatement potential (START), all based on a 20km buffer.

The IBAT Disclosure Preparation Report (DPR) assigned high, medium and low scores based on proximity to a KBA or PA relative to the buffer size or based on the maximum START and STARR scores found within the Area of Influence (Aoi).

Next steps – own operations

Through our refreshed DMA conducted in 2026, biodiversity loss due to mining of raw materials in the upstream value chain and own operations (AGP) were identified as a potential negative impact on surrounding ecosystems. Previously, all Ardagh Group manufacturing facilities were initially screened using the Biodiversity Risk Filter 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 facility's biodiversity value and sensitivity.

Impact assessment evaluates the sensitivity and exposure of biodiversity to environmental pressures and takes place at corporate and facility-levels. Both IBAT and the WWF

Biodiversity Risk Filter (BRF) analysis identify the types of nature that we engage with across our facilities.

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

We will move from corporate to facility-level assessment, with pilot facilities in the glass and metal operating businesses. This will include building our understanding of the exposure and sensitivity of biodiversity (species/habitat types), allowing us to identify relevant actions to conserve and improve biodiversity at our direct operations and useful metrics to track meaningful action, if actions are required.

Sections ESRS E1 & E2 cover our management of the climate change and pollution drivers of biodiversity loss and our emissions reductions targets.

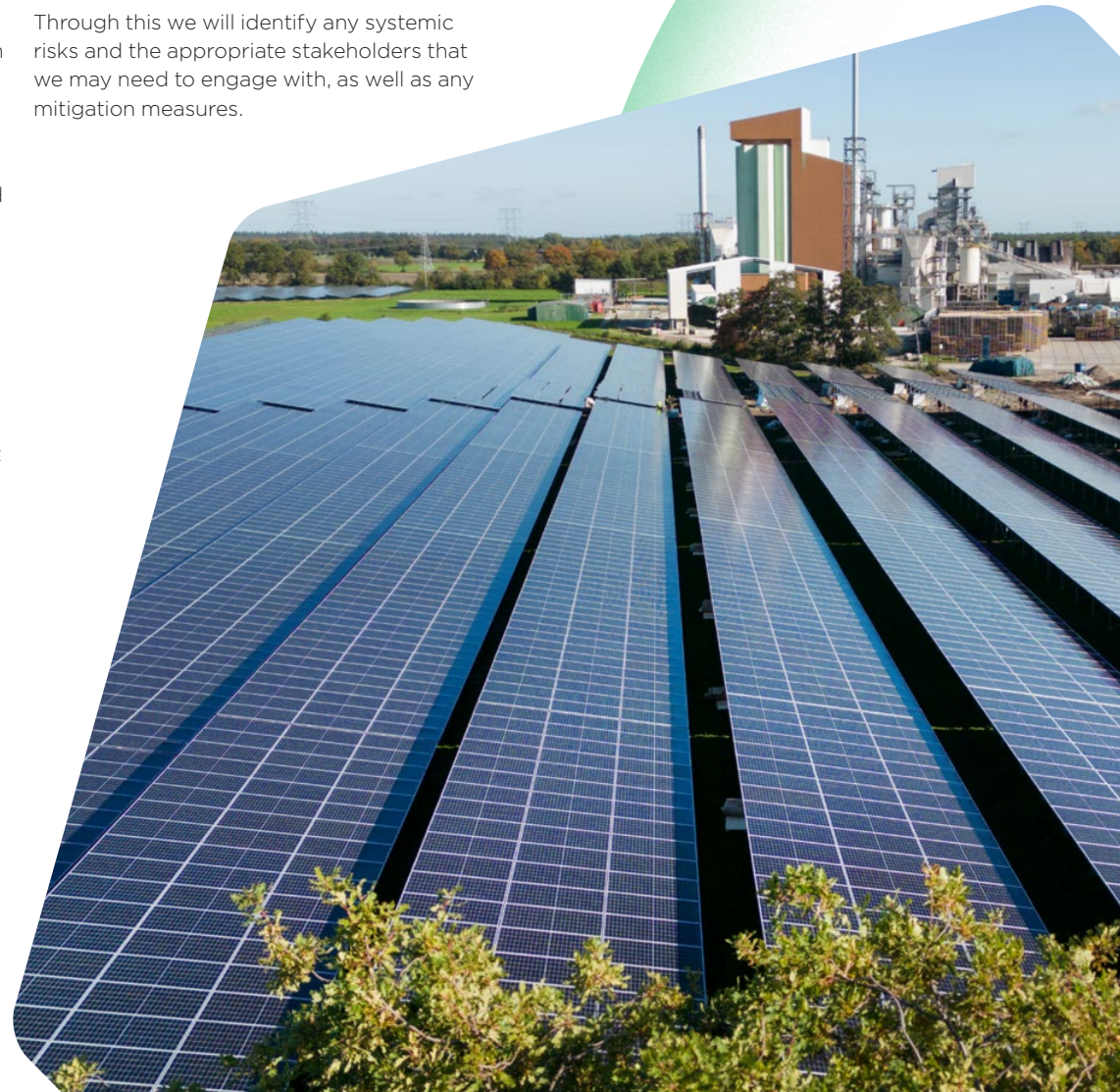
Next steps – value chain

We evaluated potential negative impacts from mining of raw materials in the upstream value chain (AGP) which could lead to biodiversity loss. The IBAT results will guide the selection of critical suppliers for further assessment.

Once we have conducted a full mapping of our direct operations, we will review our value chains, for our metal (aluminium) and glass operating businesses, in relation to biodiversity. This will include outlining our

business footprint and working closely with procurement to map our data, beginning with Tier 1 suppliers and creating a ranking system for suppliers building on the methodologies that we already use for our Scope 3 work.

Through this we will identify any systemic risks and the appropriate stakeholders that we may need to engage with, as well as any mitigation measures.





E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

SPOTLIGHT AMP-EUROPE

Serbia planting future forests

AMP-Belgrade colleagues planted over 1,500 trees on the Kopaonik mountain range, the longest in Serbia and a national park since 1981. This is one of the most significant biodiversity rich areas in Serbia; AMP provided 500 more trees for local communities to plant. This followed the launch of the Ardagh Forest community involvement project at the AIR FEST music festival in 2025, where we encouraged recycling by promising to plant a tree for every can collected and ran recycling and biodiversity workshops with local schools.



Preparing the ground for planting new trees

Volunteers during a tree-planting event



Arranging seedlings in a forest nursery





E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

SPOTLIGHT ON AGP-EUROPE

The team get hands-on with nature

AGP colleagues from the Ujście, Gostyń and Wyszków production facilities in Poland took part in a range of activities to highlight biodiversity efforts. The campaign included educating colleagues; practical actions from reducing mowing and pesticide use to composting and water bowls for birds; and an art and literary competition for our colleagues' children. All three Polish facilities came together with local authorities to create small-scale gardens illustrating natural ecosystems and supporting local flora and fauna. Each garden was managed without chemicals and chose native species which they wanted to support.



AGP colleagues making seed bombs packed with pollinator friendly plants



Employees from Gostyń working together to build a stone mound



Planting pollinator-friendly plants in the wild garden



E4 BIODIVERSITY AND ECOSYSTEMS CONTINUED

Metrics and targets

Targets related to biodiversity and ecosystems

E4-4-15, 16

We have not yet developed biodiversity targets. As part of our commitment to advancing nature-related disclosures, we are considering guidelines from the Taskforce on Nature-related Financial Disclosures (TNFD) framework. This would be 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 IROs identified across our operations and value chain.

Our current focus is on building an initial understanding of data across our direct operations and, over time, our value chain. This will help guide the potential development of science-based and context specific targets and better prepare us to navigate evolving regulatory landscapes and stakeholder demands. Our aim is to integrate biodiversity considerations into our broader sustainability strategy and risk management framework. Please also see our targets for [Emissions \(E1\)](#); [Water \(E3\)](#) and [Waste \(E5\)](#) which mitigate our impacts on biodiversity.



E5 Resource use and circular economy

As a large scale-producer of metal and glass packaging, Ardagh Group's activities are closely linked to the use of raw materials, recycled inputs and the generation and management of waste. Resource use and circularity are therefore material topics for Ardagh Group across our operations and value chain.

IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

✔ Opportunity ⚠ Risk

UPSTREAM

- ✔ Resource efficiency
- + Use of recycled materials
- ⚠ Dependency on single or limited resources



OWN OPERATIONS

- ✔ Resource efficiency
- ⚠ Dependency on single or limited resources
- Waste
- + Recycling programmes



DOWNSTREAM

- ✔ Resource efficiency
- + Recycling programmes
- ⚠ Waste management regulation





E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Impact, risks and opportunities

IRO type

Positive
 Negative
 Opportunity
 Risk

Entity

GROUP Ardagh Group
 AMP Ardagh Metal Packaging
 AGP Ardagh Glass Packaging

Value chain stage

Upstream
 Own operations
 Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Resource inflows, including resource use				
Resource efficiency	Improving resource efficiency in operational processes in own operations could lead to reduced consumption of virgin materials, resulting in lower operational costs, enhanced supply security and strengthened environmental performance and reputation.		GROUP	
	Improving resource efficiency through the integration of circular economy principles in supply chain practices could lead to reduced consumption of virgin materials, increased recycling and reuse, resulting in lower operational costs, enhanced supply security and strengthened environmental performance and reputation.		GROUP	
Use of recycled materials	Increasing the use of recycled materials as inputs in product and packaging design, which reduces dependence on virgin raw materials in the upstream value chain, could lead to lower resource extraction, improved circularity and reduced environmental pressures associated with raw-material production.		GROUP	
Dependency on single or limited resources	Dependency on single or limited sources of raw materials could lead to supply chain vulnerabilities, reduced sourcing flexibility and exposure to price volatility, resulting in financial impacts from increased procurement costs, strategic risks to supply continuity and potential reputational harm if disruptions affect customer delivery or product quality.		GROUP	
Resource outflows, related to products and services				
Recycling programmes	The impact of promoting and offering recycling programs for consumers in the product end-of-life stage in downstream value chain, could lead to proper product disposal and reduced resource outflows.		GROUP	
Resource outflows, waste				
Waste management regulations	Non-adherence to waste management regulations could lead to regulatory non-compliance and increased scrutiny, resulting in financial impacts from compliance costs and penalties, as well as reputational harm associated with poor environmental stewardship.		GROUP	
Waste	Waste generated from manufacturing activities in the production stage of the value chain, could lead to environmental burdens if not properly managed or disposed of.		GROUP	



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Impact, risk and opportunity management

Policies related to resource use and circular economy

E5-1-8, 9

Ardagh Group addresses resource use, waste management and circular economy considerations through existing Group-level policies and governance frameworks. These policies support responsible resource management, compliance with applicable environmental requirements and the integration of circular economy principles into business operations.

Ardagh Group's Environmental Policy, which is referenced in our Code of Conduct, sets expectations for environmental performance, including efficient use of materials, waste prevention and responsible waste management across operations. These principles are embedded in operational practices and continuous improvement programmes at facility and operating business level.

Ardagh Group's Responsible Procurement Policy sets out our expectations on resource use and circularity within our value chain, with requirements for suppliers to use resources responsibly and, where applicable, increase the use of recycled materials and reduce environmental impacts associated with raw material sourcing.

These policies are supported by management systems, operational procedures and action plans that guide implementation across AMP and AGP. Ardagh Group periodically reviews its policy framework to ensure continued alignment with regulatory developments, stakeholder expectations and evolving circular economy practices.



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Actions and resources related to resource use and circular economy

E5-2-10

Ardagh Group supports efficient resource use and circularity across AMP and AGP, aligned with the material impacts, risks and opportunities identified under ESRS E5. Actions are prioritised based on material efficiency potential, operational feasibility, regulatory requirements and alignment with broader sustainability objectives.



AMP focuses on reducing reliance on virgin aluminium, increasing recycled content and minimising operational waste. Key actions include:

- increasing the use of recycled aluminium in beverage cans
- improving material efficiency through lightweighting and downgauging initiatives
- returning aluminium process scrap and spoilage to suppliers for recycling within closed-loop systems
- reducing waste and material use through our ZWTL commitment
- collaborating with suppliers and customers to support higher levels of recycled content and improved material efficiency across the value chain
- investing in innovation and technology to enable higher levels of recycled content in beverage cans and can ends, including through Uni-alloy, supporting circularity and climate change mitigation, as described in the climate chapter, ESRS E1

- introduced AMPS, which is our global operational excellence framework, designed to create safer, more efficient and more sustainable facilities, by embedding standard ways of working, continuous improvement and data-driven decision-making across our operations. This promotes reduction of waste, more effective resource use and greater operational efficiency

AMP operates within a global aluminium market characterised by strong demand for aluminium scrap, which has intensified competition for secondary material. In addition, recent supply chain disruptions have temporarily constrained the availability of recycled aluminium, resulting in a slight reduction in recycled content in some regions. AMP has mitigated these impacts through active supplier engagement, long-term partnerships and sourcing strategies focused on material availability and quality.

Alongside maintaining progress on recycled content, AMP has continued to address the embedded carbon intensity of aluminium inputs. Through a combination of procurement strategies for lower-carbon aluminium and ongoing material efficiency improvements, we have mitigated emissions impacts associated with market volatility and business growth, supporting the stabilisation of Scope 3 raw material emissions.

AMP also engages with relevant industry associations to advocate for higher recycling rates and the development of consistent methodologies for measuring recycled content, contributing to improved transparency and comparability across the aluminium packaging value chain.



AGP focuses on increasing circular material use, improving material efficiency in glass production and reducing waste generation. Key actions include:

- increasing the use of recycled glass (cullet) in container production
- improving material efficiency through right-weighting and lightweighting initiatives
- returning glass process scrap and spoilage for recycling within our facilities' closed-loop systems
- investing in process improvements and furnace-level practices that support higher cullet use and reduced raw material losses
- working with suppliers, recyclers and customers to improve the availability and quality of post-consumer cullet
- reducing waste and material use through our ZWTL commitment
- collaborating with suppliers and customers to support higher levels of recycled content and improved material efficiency across the value chain

AGP operates within a complex cullet market highly shaped by a range of interacting factors, including shifting consumer trends, evolving local, national and supranational legislation and dynamic developments in energy costs and logistics. AGP actively works to mitigate exposure to these factors through ongoing customer and supplier engagement, targeted lobbying efforts, long-term partnerships and sourcing strategies designed to ensure material availability and quality.

AGP also engages with relevant industry associations to advocate for higher recycling rates, equitable treatment of glass within extended producer responsibility (EPR) frameworks and the development of consistent methodologies for measuring recycled content, contributing to greater transparency and comparability across the glass packaging value chain.

Resources and governance

Resources required to implement circularity-related actions are integrated into existing operational and capital planning processes. Operations, Procurement and Sustainability teams lead implementation, supported by environmental management systems and facility-level performance monitoring. Progress on actions is reviewed through established governance processes and reported through the metrics and targets disclosed in this chapter.



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Metrics and targets

Targets related to resource use and circular economy

E5-3-11

Ardagh Group has established targets related to operational waste management as part of its approach to resource efficiency and circularity.

Zero waste to landfill

Ardagh Group has set voluntary targets for global production facilities to achieve or maintain ZWTL aligned with the waste hierarchy and relevant regulatory guidance:

- **AMP:** met its voluntary ZWTL target across 100% of its facilities by 2025.
- **AGP:** target to achieve zero waste to landfill across all facilities by 2030.

Progress against these targets is monitored at facility-level and supported by waste prevention, reuse and recycling programmes.

Other circularity-related targets

Ardagh Group has not established formal, time-bound targets related to recycled content, cullet use or other circular material input metrics. These areas are actively managed through operational initiatives and value chain engagement, as described in the Actions and Resource Inflows sections of this chapter.

AMP publicly discloses its recycled content performance and is subject to annual third-party assurance. In response to customer requirements and market expectations, recycled content levels are actively managed across the business. In 2025, AMP achieved 76% recycled content, despite continued market volatility and year-on-year growth in production volumes.

AGP publicly discloses its recycled content performance and is subject to annual third-party assurance. In response to customer requirement and market expectations, recycled content levels are actively managed across the business. In 2025, AGP achieved approximately 55% recycled content, inclusive of both internal and external cullet inputs.





E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED



AGP-North America and CAP Glass

SPOTLIGHT ON AGP

Investing in glass recycling

AGP-North America has entered into a new long-term partnership with CAP Glass – one of the largest recyclers of glass in the United States – to invest in glass recycling services throughout the U.S.

The collaboration will divert tens of thousands of tons of glass from landfill. Used glass bottles will be collected, sorted, processed and recycled into the

high-quality cullet (recycled glass) that is critical for producing the premium glass containers that AGP-North America supplies to brands throughout the U.S. By diverting glass from landfills and using it to create new glass packaging, the partnership helps reduce waste, lower environmental impact and conserve natural resources, all the while contributing to a more sustainable, circular economy.

"

Ardagh appreciates the valuable contributions from CAP Glass, as well as their forward-thinking approach and dedication to bringing this vision to life."

Derek Wall,

Vice President, Procurement for AGP-North America



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

SPOTLIGHT ON AMP

Celebrating unsung heroes

Colleagues at the Alagoinhas metal facility honoured the heroes of local recycling systems, delivering 30 Christmas hampers to waste pickers at the Coral Cooperative.

Across Brazil, waste pickers (catadores) sort and recover high-value recyclables that would otherwise be lost, helping Brazil achieve world-leading aluminium can recycling rates (97.3% in 2024). Catadores close a critical gap, reducing municipal waste headed for disposal and contributing to impressive rates of recycling.

Cooperatives provide structure and safer conditions, turning informal work into a recognised part of the system, yet many workers still face income insecurity and climate-related hazards ([source](#)).

Our long-standing partnership with Coral has included selective collection initiatives, sponsorship of street races, "Pimp My Carroça" and environmental education collaborations that support communities and reinforce circular resource use. Together with Coral and other local partners, we're helping keep materials in circulation and supporting the people who make the system work every day.

97.3%

world-leading aluminium can
recycling rates in Brazil in 2024



Waste pickers collecting high-value recyclables in Brazil



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Resource inflows

E5-4-12, 13

AMP strategic materials

AMP	Unit	2024	2025
Key material – aluminium ¹	MT	710,145	726,419*
Share of key material – aluminium	%	100%	100%
Secondary resource – packaging ²	MT	23,436	25,775

¹ Aluminium consumed² Procured packaging covers: pallets, foils, straps and interlayers with different materials plastics, paper etc.

* Independently assured by ERM CVS

AGP	Units	2024	2025
Key material – cullet	MT	2,545,293	2,588,533*
Key material – soda ash	MT	666,381	597,821*
Key material – sand	MT	2,273,234	2,126,663*
Share of key material – cullet	%	46%	49%
Share of key material – soda ash	%	12%	11%
Share of key material – sand	%	41%	40%
Secondary resource – packaging ³	MT	–	–

³ We currently do not have sufficiently reliable data to report on secondary packaging for AGP in 2025, processes are underway to collect this information with the aim of including disclosures in the 2026 sustainability report.

* Independently assured by ERM CVS





E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

AMP

Aluminium represents the primary material input for AMP's manufacturing operations and constitutes the largest share of total material inflows used to produce beverage cans. AMP uses a combination of virgin and recycled aluminium, with recycled aluminium representing the majority of material input. In 2025, recycled aluminium accounted for 76% of our overall aluminium composition procured, compared with 64% in the 2020 baseline year.

Increasing the share of recycled aluminium is key to lowering upstream environmental impacts by reducing reliance on virgin material inputs. Aluminium accounts for 91% of our Scope 3 emissions and 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 metal¹.

Innovation is a core element of our strategy to advance product recyclability. By developing and deploying technologies such as Uni-alloy, AMP has enabled the use of high recycled content can bodies and ends, increasing the potential for higher levels of recycled content across our products.

Aluminium process scrap and spoilage generated during production are routed back to suppliers for recycling, supporting closed-loop material systems. AMP's material inflows are managed through established procurement and production planning processes.

AGP

AGP's primary material inflows consist of raw materials used in container glass manufacturing, including silica sand, soda ash and limestone, together with recycled glass (cullet) used in batch formulations.

In 2025, AGP sourced approximately 6.4 million tonnes of virgin raw materials across its production network. Recycled glass constituted a significant proportion of material input, accounting for approximately 55% of total batch input with externally sourced post-consumer recycled (PCR) cullet representing an estimated 38% of total batch input.

Cullet is sourced through a combination of external recyclers, municipal collection systems and internal recovery from production processes. Increased use of recycled glass reduces demand for virgin raw materials and supports energy efficiency and emissions reductions in furnace operations.

Data management and monitoring

Resource inflows at AMP and AGP are monitored through environmental management systems, procurement records and operational tracking tools. While measurement approaches vary by site and material stream, Ardagh Group continues to improve data consistency and transparency to support performance management, regulatory compliance and reporting under ESRS E5.



¹ [Source](#)



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Resource outflows – products

E5-5-15

Ardagh Group does not currently quantify a formal designed recyclability rate for its products; however, both aluminium beverage cans and glass containers are widely compatible with existing collection and closed-loop recycling systems across the markets in which they are sold.

AMP

AMP's primary product outflows are aluminium beverage cans. These products are lightweight, durable and designed for single-use consumption, followed by collection and recycling. Aluminium cans are not designed for repair or reuse but are compatible with closed-loop recycling systems, allowing material to be recovered and recycled multiple times without loss of quality.

AMP supports high recyclability through product design and material selection, while minimising material use through lightweighting and downgauging initiatives.

AGP

AGP's primary product outflows are glass containers for food and beverages. Glass containers are durable, inert and compatible with closed-loop recycling systems. In certain markets, glass containers are reused through multi trip systems; however, AGP's products are generally designed for recycling rather than refurbishment or disassembly.

High recycled glass content in production supports circular material flows and reduces reliance on virgin raw materials.





E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Waste generated by facilities during 2025

E5-5-16 (b to e), 17

		AMP		AGP		Ardagh Group	
	Unit	2024	2025	2024	2025	2024	2025
Total waste generated	MT	24,796	24,904*	60,586	60,346*	85,382	85,250*
Recovery – hazardous of total waste	%	29%	17%*	4%	3%*	11%	7%*
Recovery – non-hazardous of total waste	%	47%	53%*	47%	54%*	47%	53%*
Recovery – reuse & recycling of total waste	%	76%	70%*	51%	57%*	58%	61%*
Recovery – other operations of total waste ¹	%	–	–	–	–	–	–
Total Recovery – diverted from disposal of total waste	%	76%	70%*	51%	57%*	58%	61%*
Disposed – hazardous of total waste	%	12%	20%*	3%	5%*	6%	9%*
Disposed – non-hazardous of total waste	%	5%	10%*	1%	10%*	2%	10%*
Disposed – incineration of total waste	%	–	–	–	–	–	–
Disposed – landfill of total waste ¹	%	7%	0.1%*	45%	28%*	34%	20%*
Disposed – other operations ¹	%	–	–	–	–	–	–
Total disposal – waste directed to disposal of total waste	%	24%	30%*	49%	43%*	42%	39%*
Unknown final destination	%	0%	0%	0%	0%	0%	0%
Radioactive waste	MT	N/A	N/A	0%	0%	0%	0%

¹ Detailed breakdown not available

* Independently assured by ERM CVS



E5 RESOURCE USE AND CIRCULAR ECONOMY CONTINUED

Waste generation and classification

Operational waste generated across AMP and AGP includes both hazardous and non-hazardous waste streams. Non-hazardous waste primarily consists of process by-products, packaging materials and production scrap, while hazardous waste may arise periodically from maintenance activities, equipment refurbishment or specific process inputs.

Waste generation data, including hazardous and non-hazardous waste volumes and treatment methods, are disclosed in the corresponding E5-5 table.

Waste management practices

Waste management across Ardagh Group is guided by the waste hierarchy, with priority given to prevention, reuse and recycling. Where recycling is not feasible, waste may be directed to recovery or disposal in accordance with applicable regulations.

AMP

AMP generates primarily non-hazardous waste, the majority of which consists of aluminium scrap. This scrap is returned to suppliers for recycling within closed-loop systems and reused in aluminium sheet for beverage can manufacture. Hazardous waste is generated intermittently and managed in accordance with regulatory requirements.

AGP

At AGP, operational waste includes internal cullet not fit for purpose, raw material losses, packaging waste and sludge from on-site water treatment. Metals and other recoverable materials are segregated for recycling where possible. Waste streams are monitored and managed at facility-level in line with Ardagh Group's Environmental Policy.

Statement of radioactive waste generation

Ardagh Group does not generate radioactive waste in the course of its operations.

Radioactive waste is therefore not applicable to Ardagh Group's activities under ESRS E5-17.





S1 Own workforce	80
S2 Workers in the value chain	104
S3 Affected communities	111
S4 Consumers and end-users	117

Social

At Ardagh Group,
we work towards
a common purpose





S1 Own workforce

Our workforce is central to how we operate and grow, and our focus is on creating a safe and inclusive workplace at all our facilities.

Learning and skills development are key to our approach, and our approach to health and safety helps us prioritise employee wellbeing.

IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

+ Opportunity - Risk

UPSTREAM



- ✓ - Social dialogue and collective bargaining for employees
- ✓ - Employee health and safety
- Adequate employee working conditions
- ✓ Workplace harassment
- + Representation and belonging
- ✓ Equal pay practices
- ✓ Employee training and development

OWN OPERATIONS



DOWNSTREAM



S1 OWN WORKFORCE CONTINUED

Impact, risks and opportunities

IRO type

+ Positive
 - Negative
 ^ Opportunity
 v Risk

Entity

GROUP Ardagh Group
 AMP Ardagh Metal Packaging
 AGP Ardagh Glass Packaging

Value chain stage

U Upstream
 O Own operations
 D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Working conditions (including adequate wages, work-life balance, working time, secure employment, social protection)				
Social dialogue and collective bargaining for employees	Limited or inadequate social dialogue and collective bargaining mechanisms in own operations could lead to potential reduced employee representation and limitations on workers' ability to collectively raise concerns and improve working conditions, weakening employee trust and contributing to deterioration in working conditions and employee wellbeing.	-	GROUP	O
	Inadequate social dialogue and collective bargaining mechanisms for workers in own operations could lead to reduced opportunities for open dialogue, lower levels of employee trust and increased workplace tensions, resulting in higher employee turnover, regulatory non-compliance risks, reputational damage and potential financial impacts through remediation costs.	v	GROUP	O
Adequate employee working conditions	Failure to provide adequate working conditions (e.g. work-life balance, competitive wages or adequate employment opportunities) for employees in own operations could lead to lower employee trust, reduced ability to attract and retain highly skilled personnel, increased employee turnover and diminished organisational performance.	-	GROUP	O
Diversity and equal treatment (including gender equality, equal pay for work of equal value, employment and inclusion of people with disabilities, non-discrimination, anti harassment, measures against violence)				
Workplace harassment	Mishandling or failing to address cases of harassment or violence could lead to unresolved employee grievances, resulting in deterioration of employee wellbeing and increased absenteeism or turnover.	-	GROUP	O
	Mishandling or failing to address cases of harassment or violence could lead to unresolved employee grievances, workplace tension and escalation of incidents, resulting in legal and regulatory penalties, financial impacts and reputational harm.	v	GROUP	O
Representation and belonging	Fostering a working environment that supports equal opportunities, representation and belonging, could lead to enhanced employee well-being, stronger innovation and problem-solving capacity, improved social equity and broader positive societal outcomes through fair and inclusive employment practices.	+	GROUP	O
Equal pay practices	Disregarding gender equality and equal pay requirements could lead to non-compliance issues and challenges raised by affected employees, resulting in legal and regulatory penalties, financial impacts and reputational harm.	v	GROUP	O



S1 OWN WORKFORCE CONTINUED

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Health and safety				
Employee health and safety	Insufficient health and safety standards and practices in the company's own operations could lead to workplace accidents and injuries, deterioration of employee health and wellbeing and adverse social consequences for the workforce.	-	GROUP	O
	Failure to adhere to health and safety standards could lead to workplace accidents, serious injuries and operational disruption, resulting in legal and regulatory penalties, increased operational costs and reputational harm.	v	GROUP	O
Training and skills development				
Employee training and development	Insufficient training and development opportunities could lead to reduced employee morale, lower job satisfaction, diminished productivity and higher turnover, resulting in increased operational costs, strategic workforce challenges and reputational harm.	v	GROUP	O

S1 OWN WORKFORCE CONTINUED

Impact, risk and opportunity management

Policies related to own workforce

S1-1-9, 10; S1-3-15, 16

We strive to create a safe, inclusive and supportive work environment.

We are committed to fair and equitable employment practices and to operating with the highest standards of integrity and honesty. We expect full compliance with all applicable laws and regulations across the business and our supply chain. [Ardagh Group's Code of Conduct](#) (Code) 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 prevent discrimination and harassment, to promote equal opportunities and advance diversity, equity and inclusion. Together, they also seek 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 details, see the [Code of Conduct](#).

We are dedicated to fostering a positive and productive work environment that enhances the overall wellbeing 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 fostering open communication; as well as our respect for the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, 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 are also committed to 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.

Additional employee-related policies cover wellbeing, 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 and 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 pages 104 to 110](#)

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 our approach to speaking up, see G1 Business conduct.

➔ [For more detail, see G1 pages 123 to 128](#)

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 the Compliance Committee.

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.

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
- Promoting work-life balance
- Tracking, from 2025, all participation metrics via our learning management system myLearning

S1 OWN WORKFORCE CONTINUED

Engagement with own workforce and workers' representatives

S1-2-11, 12; S1-3-15, 16; S1-4-7

Two-way communication between the management team and employees is vital for Ardagh Group, enabling us to recognise performance, promote teamwork and celebrate results.

Target: By 31 December 2025, and each year thereafter, conduct a minimum of four formal social dialogue sessions per year with employee representatives in every operational region.

Across Ardagh Group, engagement methods are adapted to suit local regulatory environments, cultural contexts and operational priorities.

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

- We conduct a biennial Global Engagement Survey in partnership with a market-leading employee experience platform. Following our 2024 Global Engagement Survey, which had a 70% participation response rate, we held meetings with employees at each of our offices and facilities to design local action plans. We also organised leadership meetings to discuss results and design regional and global action plans. The key areas of focus were collaboration and communication, learning and development and recognition.

- At the quarterly business update briefings hosted by our business and regional operating CEO's we share key operational and market updates. These townhalls also offer each region an update on global or regional initiatives and any country-specific updates.
- On myArdagh, our intranet platform, we distribute regular monthly employee emails which accompany bi-weekly news updates (published in relevant languages).
- We also share company news and key updates via TV screens across all Ardagh Group locations, ensuring timely and accessible information on site.
- 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

Existence of channels for own workforce to raise concerns or needs and approaches to remedy

S1-2-13, 14

We encourage employees, contractors and any other individuals in our workforce to speak up if they have concerns, without fear of retaliation or discrimination.

Individuals 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.

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.

→ For more detail, see [G1 pages 123 to 128](#)



S1 OWN WORKFORCE CONTINUED

Metrics and targets

Characteristics of the undertaking's employees

S1-5-18, 19

As of 31 December 2025, Ardagh Group's total employee headcount was 18,796.

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 2025 were formally submitted to the Finance Department. These figures have been incorporated into the Ardagh Group SA Annual Report.

Total number of employees by gender

S1-5-19(a)

Gender	Number of employees (headcount) 2024	Number of employees (headcount) 2025
Male	16,014	15,724
Female	2,990	3,044
Not declared/Other	13	28
Not reported	–	–
Total employees	19,017	18,796

Total number of employees > 50 for 10 largest countries table

S1-5-19(a)

Country	Number of employees (headcount) 2024	Number of employees (headcount) 2025
United States	5,754	5,496
Germany	3,436	3,268
South Africa	2,251	2,449
United Kingdom	2,181	2,231
Poland	1,099	1,105
Brazil	948	935
Netherlands	919	892
Sweden	481	477
Denmark	336	341
France	316	328





S1 OWN WORKFORCE CONTINUED

Total number of employees by contract type and gender (excl. Board) table

S1-5-19(b)

Headcount	Male	Female	Not declared/ Other	Total
Number of permanent employees (headcount/FTE) – 2025	14,823	2,772	25	17,620
Number of permanent employees (headcount/FTE) – 2024	15,154	2,793	13	17,960
Number of temporary employees (headcount/FTE) – 2025	883	260	3	1,146
Number of temporary employees (headcount/FTE) – 2024	807	179	–	986
No. of non-guaranteed hours employees – 2025	18	12	0	30
Number of non-guaranteed hours employees – 2024	53	18	–	71
Number of employees total – 2025	15,724	3,044	28	18,796
Number of employees total – 2024	16,014	2,990	13	19,017

Employee turnover table

S1-5-19(c)

Headcount	2024	2025
Total number of leavers	2,777	2,496
Rate of employee turnover	15%	13%





S1 OWN WORKFORCE CONTINUED

Collective bargaining coverage and social dialogue

S1-7-22 to 24

We recognise that employers and employees have both mutual and potentially competing interests.

We understand 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 2025:

- More than 78% of our employees were covered by collective bargaining agreements, highlighting our commitment to fair labour practices and employee rights.
- 88% 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 and social dialogue table

S1-7-23, 24

Coverage rate	Employees – EEA (for countries with >50 employees included in the ten largest countries)		Employees – Non-EEA	
	2024	2025	2024	2025
0-19%	Poland	–	United Kingdom	–
20-39%	–	–	–	–
40-59%	–	–	–	–
60-79%	–	Poland	United States	United States
	–	–	South Africa	South Africa
80-100%	Germany	Germany	Brazil	United Kingdom
	Netherlands	Netherlands	–	Brazil
	Sweden	Sweden	–	–
	Denmark	Denmark	–	–
	France	France	–	–
Global coverage				78%



S1 OWN WORKFORCE CONTINUED

Diversity metrics at top management level

S1-8-25,26

Diverse talent can help to solve our biggest challenges, driving growth and our continued success.

Target: Achieve 100% completion of Employee Lifecycle Review Workshops in all regions by 31 December 2025 and repeat this cycle every two years (e.g., 2027, 2029 etc.).

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. We compare our performance against industry data and report regularly in accordance with our sustainability commitments.

To support our commitment to DE&I, we continuously review and enhance our employee lifecycle processes.

We reviewed our HR practices in 2025 in all our regions through workshops with representatives of underrepresented groups, leading to a variety of incremental improvement suggestions.

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.

As part of our broader commitment to inclusion, we are also investing in our future workforce through “Ardagh for Education” initiatives. These efforts aim to build a more diverse pipeline of workers by supporting education access and equity, particularly encouraging more girls to pursue STEM subjects.

Gender distribution at top management level table

S1-8-26

Male		Female		Not declared/Other	
Headcount	Percentage	Headcount	Percentage	Headcount	Percentage
103	86%	15	13%	1	1%

Age distribution across all employees

S1-9-66(b)

Age groups	Number of people	Percentage
<30	2,994	16%
30-50	9,694	52%
>50	6,108	32%





S1 OWN WORKFORCE CONTINUED

Adequate wages

S1-9-27, 28; S1-15-40(a)

We seek a culture that is fair and equal, and we reflect this in how we reward our teams for their efforts.

Target: Ensure that by 31 December of each calendar year, 100% of employees receive at least an adequate wage.

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 operate fair 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.

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 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, our remuneration packages reflected the following:

- All wage packages were above the relevant local statutory minimum wages in all relevant countries
- The gender pay gap stood at 11% for Ardagh Group. This is the difference in average earnings between male and female employees across our organisation, regardless of seniority or tenure





S1 OWN WORKFORCE CONTINUED

Social protection

S1-10-29, 30

We believe in supporting our valued employees during periods of hardship and complexity.

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.

"

We know that wellbeing goes beyond the workplace, and we offer programmes that are designed to support employees in activities outside the working environment."

Training and skills development

S1-12-33, 34

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 and assessment and instructor-led materials. These are supported by reporting dashboards that provide clear oversight for management teams.

All employees in all regions, except for AGP-Africa, now have access to the myLearning platform. This enables all employees to access learning opportunities, with the platform also serving as a central repository for training records.

AGP-Africa also plan to migrate to the HR system and provide full access to myLearning for all employees in the region.

Our learning resources include key materials on topics such as leadership, business and people skills, sustainability, IT, health and safety, leadership, team building, quality management topics, languages, communication skills and legal and compliance topics. We developed the Ardagh Group Learning Academies to promote learning 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 can access leadership development programmes and digital/workshop learning activities. We also provide assessments, coaching and mentoring opportunities on topics including unconscious bias, respectful workplace training, supervisor training, emotional intelligence and leading difficult conversations.

Ardagh's Global mentoring programme is in place to connect talents with experienced executives across our regions to build meaningful connections, share real-life leadership stories and inspire personal growth. Mentors and mentees meet regularly over a six-month period to discuss the mentee's professional development.

LinkedIn Learning was rolled out across Ardagh Group in July 2025, with unlimited access to more than 24,000 online courses – available in multiple languages and covering a wide range of topics to support personal and professional growth. Topic areas include leadership and professional development, business skills, project management, sales, HR, customer service and finance, AI, data science, IT and software development, along with many Microsoft product courses. LinkedIn Learning is freely available to all employees and 81% of learners who provided feedback stated they are gaining valuable skills from this resource, and confidence levels were shown at 4.14/5.00. Since launching we have over 1,200 activated accounts, over 950 hours of content viewed, over 2,300 course views, more than 18,300 video views and over 50 engagements with AI-powered resources. Popular content has included Copilot/AI, Coaching skills, PowerBI and Project management.



S1 OWN WORKFORCE CONTINUED



AMP-Europe apprentices

SPOTLIGHT ON AMP

Apprentices leading sustainable change

The Apprenticeship Programme in AMP-Europe gives early career talent hands-on experience that builds the technical, operational and analytical skills needed to support our sustainability goals. This year, five apprentices contributed directly to key improvement projects aimed at reducing environmental impact and enhancing operational efficiency. Working across production and logistics teams, they supported three targeted initiatives: to reduce ink usage; minimise water consumption; and optimise external warehouse processes.

The apprentices gained practical exposure to continuous improvement tools and sustainable operational practices, applying classroom knowledge to real operational challenges to strengthen responsible resource use, reduce waste and increase efficient material flow across operations.

"

We initiated the programme after internal discussions about suitable projects for apprentices and it grew from there. We advertised the opportunities through the college website and students applied directly. Ultimately, it's a team effort – without committed supervisors guiding them, the initiative would not have succeeded."

Milena Zikić,
Programme Creator



S1 OWN WORKFORCE CONTINUED



Ardagh apprentices visit Leeds Corn Exchange

SPOTLIGHT ON AGP

Investing in early-career talent development

The AGP-Europe Graduate Programme is a two-year rotational journey designed not just to recruit high-potential graduates, but to immerse them fully in the craft, complexity and innovation that define the company. Today, six graduates are part of the programme, each rotating through key functions of the business where they gain hands-on experience that supports their professional growth while strengthening AGP-Europe's long-term capability needs.

From day one, participants step into real operational environments, supported by experienced managers and placement sponsors who guide their development. Every rotation is designed to build strong technical knowledge, deepen business understanding and encourage cross functional insight. By moving through different parts of the organisation, graduates gain a broad, connected view of how the glass division operates and how each function contributes to overall performance.

"

Investing in early career talent is essential for our future. The Graduate Programme ensures we develop skilled, engaged professionals who will help drive innovation and sustainable growth across our glass operations."

Ulrika Danielsson,
HR Director for AGP-Europe



S1 OWN WORKFORCE CONTINUED

We have now embedded LinkedIn Learning content into our onboarding processes and our learning academies and are incorporating it into our leadership development programme.

Our language skills programme, in partnership with GoFLUENT provides access to a wide range of learning materials across several languages. These include digital learning resources accessible through myLearning and unlimited access to online live classrooms to practise and perfect language skills. Since renewing the annual programme in March 2025, we have seen 1,672 active users completing over 1,100 learning hours across over 2,750 learning activities and 84 1:1 conversation classes.

AGP-Europe re-launched its graduate programme in 2025, designed to equip graduates with the technical expertise, leadership skills and international experience needed to progress into specialist or leadership roles within AGP upon successful completion.

Ardagh Group North America (AG-NA) has committed to invest in Project Lead the Way Internship programme in community schools. This programme is a unique initiative to equip our future engineers and plant leaders with the experience and skills to make them successful within AG-NA.

In 2025, as part of our annual cycle, we conducted our Talent Review and Succession Planning Process for our regional businesses. This is our global and company-wide process to help ensure we have the right talent in the right place at the right time to achieve our strategic goals. For our managers it provides a framework for the development of individuals in their team.

All employees participate in compliance training, including on Code of Conduct, Speak Up and Whistleblowing, and Cyber Awareness. This goes alongside targeted safety and job-specific training and helps employees gain greater confidence in their decision-making, become better equipped to protect their personal and professional integrity, and feel empowered to speak up and challenge appropriately – supporting their overall personal growth and career development.

The average training hours per employee

S1-12-34(b)

	2024	2025
Average training hours	11	13

Employees participating in regular performance and career development reviews

S1-12-34(a)

	Total headcount	Participants	Participation rate
Male	13,728	8,435	61%
Female	2,650	1,831	69%
Not declared/Other	28	10	36%
Total headcount	16,361¹	10,276	63%

¹ AGP-A data collected locally and based on local reporting





S1 OWN WORKFORCE CONTINUED

Health and safety metrics

S1-13-35, 36

We are determined to provide a healthy and safe workplace for all employees, visitors and contractors operating within our workplace.

It is our commitment to provide a healthy and safe workplace for all employees, visitors and contractors operating within our workplace.

100% of our employees are covered by occupational safety.

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. This is managed by our dedicated Environmental, Health and Safety team and incorporates training and communications on safety topics including traffic safety, machine operations and work permits.

100%

of our employees are covered by occupational safety.

We regularly review the effectiveness of BSafe! 7/7+ through internal audits that 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 the 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.

In 2025, the safety metrics were:

- 222 work-related injuries, with a total recordable incident frequency rate of 5.6%.
- No fatalities among our own employees

Work-life balance metrics

S1-14-37, 38

We take a holistic approach to supporting our employees, based on our belief that their health and wellbeing is fundamental to the sustainability of our business. We support work-life balance by offering hybrid working, which provides flexibility for employees in eligible roles and seeking to ensure reasonable working hours in line with local guidelines.





S1 OWN WORKFORCE CONTINUED

SPOTLIGHT ON AMP

Making it personal

AMP North America created a video with a very special purpose: to make a personal connection to health and safety. The video features the spouses and children of team members from the Chicago, Fremont and Huron facilities, and captures candid, emotional reflections that show how a commitment to safety extends far beyond the plant floor.

Patrick McGraw, a Decorator Maintainer in Huron, appears alongside his son Silas, who says simply: “We always want him to come home”, especially because “those machines have really dangerous stuff”.

Standing by his son, Shipping Supervisor Thomas Schwartz highlights the need for vigilance around forklift traffic: “Everyone has the same goal here – look out for others like you would want them to look out for you.”

Lead Electrical Technician Nick Fox reinforces the importance of working in pairs: “The condition I come into work is the condition I want to go home. Having each other’s backs is a huge help”.

Safety is more than a policy – it’s a culture. When each of us does our part, we help protect ourselves, our teammates and the people in our lives who matter the most.

“

Everyone has the same goal here – look out for others like you would want them to look out for you.”

Thomas Schwartz,
Shipping Supervisor, AMP North America



Patrick McGraw, a Decorator-Maintainer at our Huron, Ohio facility

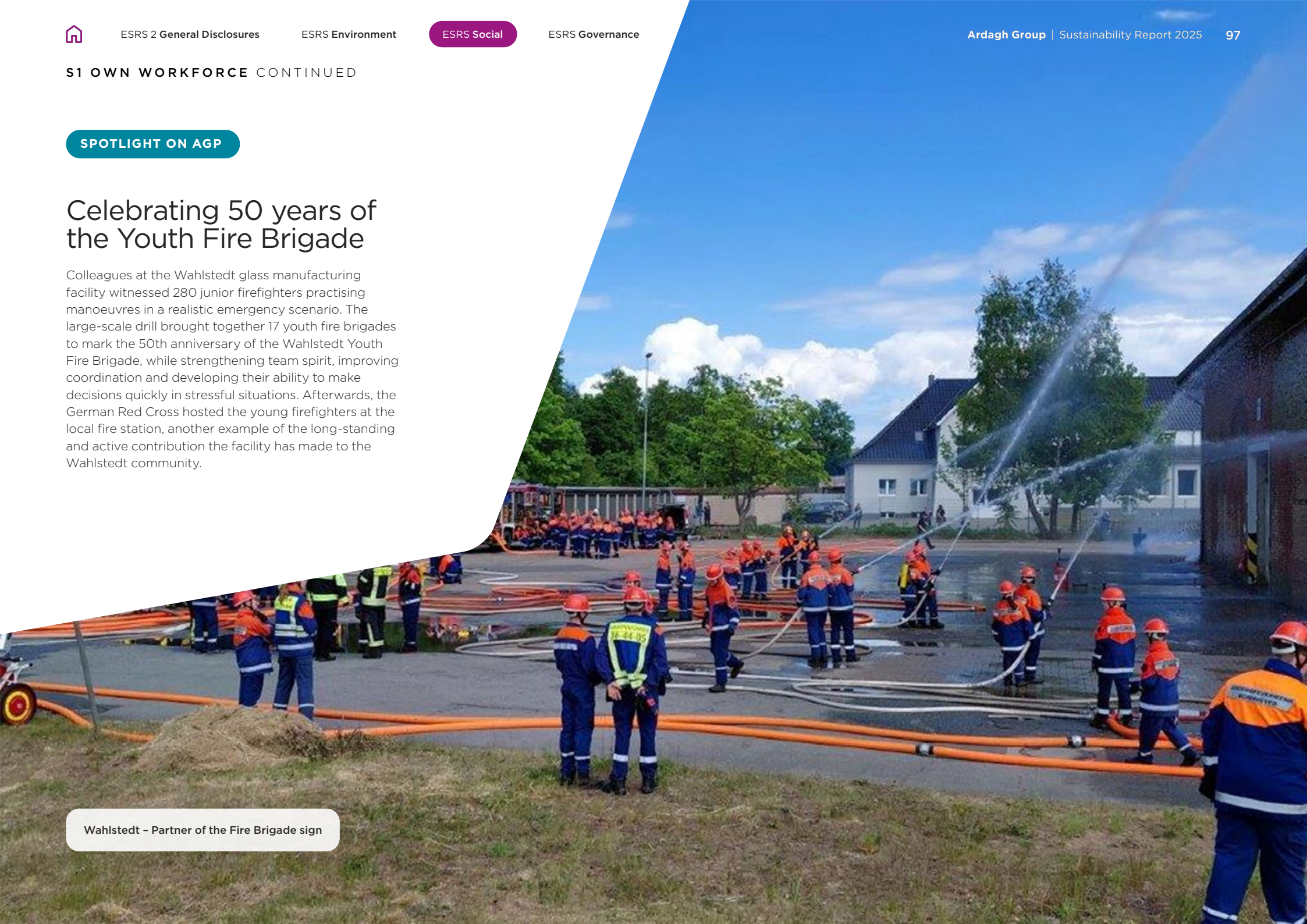


S1 OWN WORKFORCE CONTINUED

SPOTLIGHT ON AGP

Celebrating 50 years of the Youth Fire Brigade

Colleagues at the Wahlstedt glass manufacturing facility witnessed 280 junior firefighters practising manoeuvres in a realistic emergency scenario. The large-scale drill brought together 17 youth fire brigades to mark the 50th anniversary of the Wahlstedt Youth Fire Brigade, while strengthening team spirit, improving coordination and developing their ability to make decisions quickly in stressful situations. Afterwards, the German Red Cross hosted the young firefighters at the local fire station, another example of the long-standing and active contribution the facility has made to the Wahlstedt community.



Wahlstedt – Partner of the Fire Brigade sign



S1 OWN WORKFORCE CONTINUED

Remuneration metrics

S1-15-39, 40

We are dedicated to fostering a supportive and balanced work environment, with 98% of our workforce entitled to family-related leave. In 2025, 5% of our female and 8% of our male workforce took advantage of this benefit.

Rewarding employees

We recognise the tremendous value our people bring to their work, and we want our people to feel rewarded fairly for their talent and hard work. We use global employee recognition and reward guidelines to provide consistency in our approach adapting to local contexts as local laws, regulations and labour agreements dictate.

Remuneration reflects each employee's competence, capability and experience, relative to the market for their role. 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 package for all employees wherever they work. Benefits include pension and retirement support or health and wellbeing provisions available to all employees.

In 2025, we finalised our umbrella principles for employee benefits, which are an important part of our total remuneration offer and make a vital contribution to our employee value proposition. Through our benefit principles, we aim to foster an engaged, healthy and productive workforce – one that feels valued and supported by the business and confident that their benefits package is fair, equitable across the organisation and competitive with what other employers offer.

Conditions of work, wages and other forms of remuneration comply with national laws and regulations. They are consistent with the 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.



S1 OWN WORKFORCE CONTINUED

Incidents of discrimination and other human rights incidents

S1-16-41, 42

We are 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 2025, we completed our annual review of 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 details 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)

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 2025:

- Total number of incidents of discrimination at work, including harassment, identified in 2025: AMP: 3 and AGP: 6
- Number of human rights incidents connected to our own workforce, excluding those related to discrimination: 0
- Total amount of fines, penalties and compensation for damages recognised during the reporting period in the financial statement for incidents of discrimination and other human rights incidents: 0





S1 OWN WORKFORCE CONTINUED

ARDAGH FOR EDUCATION

Inspiring future generations

Ardagh for Education's mission is to give back to the communities we operate in through high-quality Science, Technology, Engineering, and Maths (STEM) education. We make an impact by upskilling teachers through high-quality training and providing students with hands-on STEM learning experiences to enhance their technical abilities and equip them 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 engage with these schools, building relationships with teachers and students, volunteering time in classrooms, and highlighting career opportunities in STEM and with Ardagh. Some of these students have also joined Ardagh's internship and apprentice programmes, and investing in the next generation of talent in our local communities remains a strategic priority.

We are investing broadly across our communities to create a more diverse STEM pipeline, reaching often overlooked populations, and investing in workforce development by providing opportunities to the next generation of innovators.



Students working on a City4Future electrical grid activity at the A4E Germany Summit



S1 OWN WORKFORCE CONTINUED

ARDAGH FOR EDUCATION



North America – Summer internship programme



Europe – Student facility tour



South America – Teacher's get together



North America – Leaders and interns



Europe – Student facility tour



Africa – Robotics challenge





S1 OWN WORKFORCE CONTINUED

ARDAGH FOR EDUCATION

Key results & impact

Since 2021

Number of Ardagh colleagues that have engaged in the programme as volunteers

1,000+

Number of interns, apprentices, and entry-level hires from local schools through the programme

150+

To date, we have partnered with

800+

primary and secondary schools across

45

Ardagh communities on four continents

We have upskilled

2,900+

teachers through STEM training

We have reached **300,000+ students** with hands-on STEM learning:

92%

of our students are more aware of STEM career paths

95%

of our students demonstrate improved problem-solving and critical thinking skills

70%

of our students come from underserved/ economically disadvantaged backgrounds

47%

of participating students are female, often underrepresented in STEM



S1 OWN WORKFORCE CONTINUED



Fishers office volunteers with Million Meal Movement

ARDAGH IN THE COMMUNITY

Ardagh in the Community

Ardagh Group launched its Ardagh in the Community strategy in 2025, 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 there was a strong focus on education with 43% of projects focusing on this. 25% of community projects focused on Biodiversity – see some examples in our spotlights on [pages 64 and 65](#). Together, more than 1,350 Ardagh colleagues contributed ~18,382 volunteer hours, the equivalent of over two years of time donated to our local communities.

43%
of projects focused on education

25%
of projects focused on biodiversity

~18,382
volunteer hours given by more than 1,350 colleagues

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 value chain, as well as respecting their human rights, which helps to increase our sustainable impact, reduce risk and drive our long-term performance.

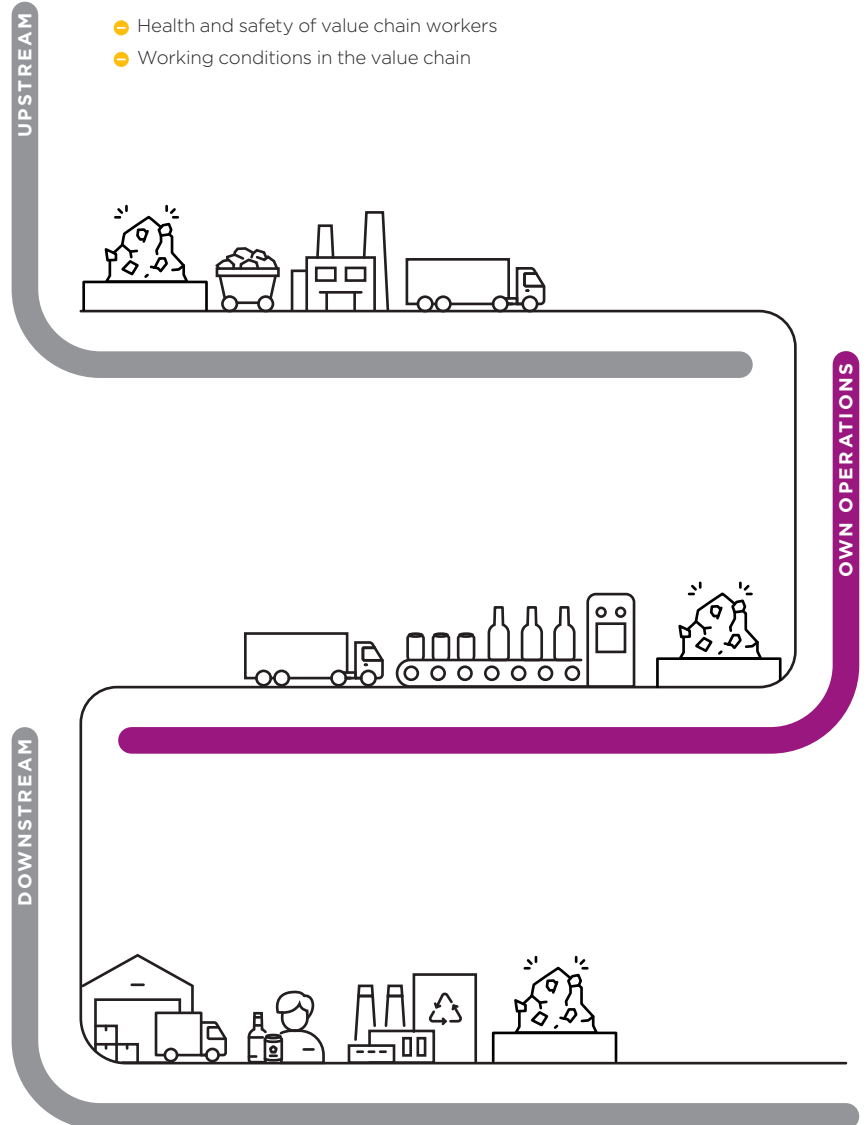
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

✔ Opportunity ✖ Risk





S2 WORKERS IN THE VALUE CHAIN CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Working conditions (including adequate wages, work-life balance, working time, secure employment, social protection)				
Health and safety of value chain workers	Inadequate application of health and safety practices by suppliers, could lead to workplace accidents and adverse health outcomes for value chain workers.	-	GROUP	U
Working conditions in the value chain	Limited application or non-compliance with working time laws and regulations by suppliers in the upstream value chain, could lead to poor working conditions for workers in the value chain.	-	GROUP	U



S2 WORKERS IN THE VALUE CHAIN CONTINUED

Impact, risk and opportunity management

Policies related to workers in the value chain

S2-1-9 to 11

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 (including third parties working on our premises) to respect and enforce our standards, to comply with all applicable laws and regulations and to 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 apply 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, which serves as our supplier code of conduct, sets out our approach to managing topics, including human rights, across our value chain. It outlines the standards that we require of our suppliers, including related to social, ethical and environmental matters, human rights (covering prevention of human exploitation including human trafficking, forced labour and child labour; the right to collective bargaining, fair working conditions, protection from discrimination, harassment and violence and the promotion of diversity) 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 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. 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.





S2 WORKERS IN THE VALUE CHAIN CONTINUED

Engagement with workers in the value chain, existence of channels for workers in the value chain to raise concerns or needs, and approaches to remedy

S2-2-12 to 15

As part of our responsible procurement risk assessment cycle, we engage with suppliers throughout the procurement process about the actual and potential impacts on workers in the value chain. This engagement forms part of our supplier risk assessment with our suppliers' 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 their risk profile.

We regularly assess the effectiveness of our supplier assessments and develop risk mitigation measures if needed. Suppliers may also be required to undergo ethical audits, which are either conducted by Ardagh Group representatives or 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 workers in the value chain on actual and potential impacts on an ongoing basis. For example, in 2025 we reviewed our criteria for identifying selected suppliers to ensure we have an appropriate focus on their workers that may be subject to actual or potential impacts. In 2025 we also launched our Worker's Voice surveys, which provide an opportunity for individuals from third parties working on our premises to give anonymous feedback on their working conditions.

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

If we identify any material negative impacts 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 our 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 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.

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 and 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.

We are committed to protecting reporters from retaliation, as detailed in 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.





S2 WORKERS IN THE VALUE CHAIN CONTINUED

Actions and resources related to workers in the value chain

S2-3-16 to 18

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 for 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 detail the mitigation measures in place to address potential negative impacts. Examples of our approach are set out in the table below.

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.





S2 WORKERS IN THE VALUE CHAIN CONTINUED

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 abuse 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.

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 for 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.

In 2025, we did not receive or identify any concerns related to human rights in our supply chain.

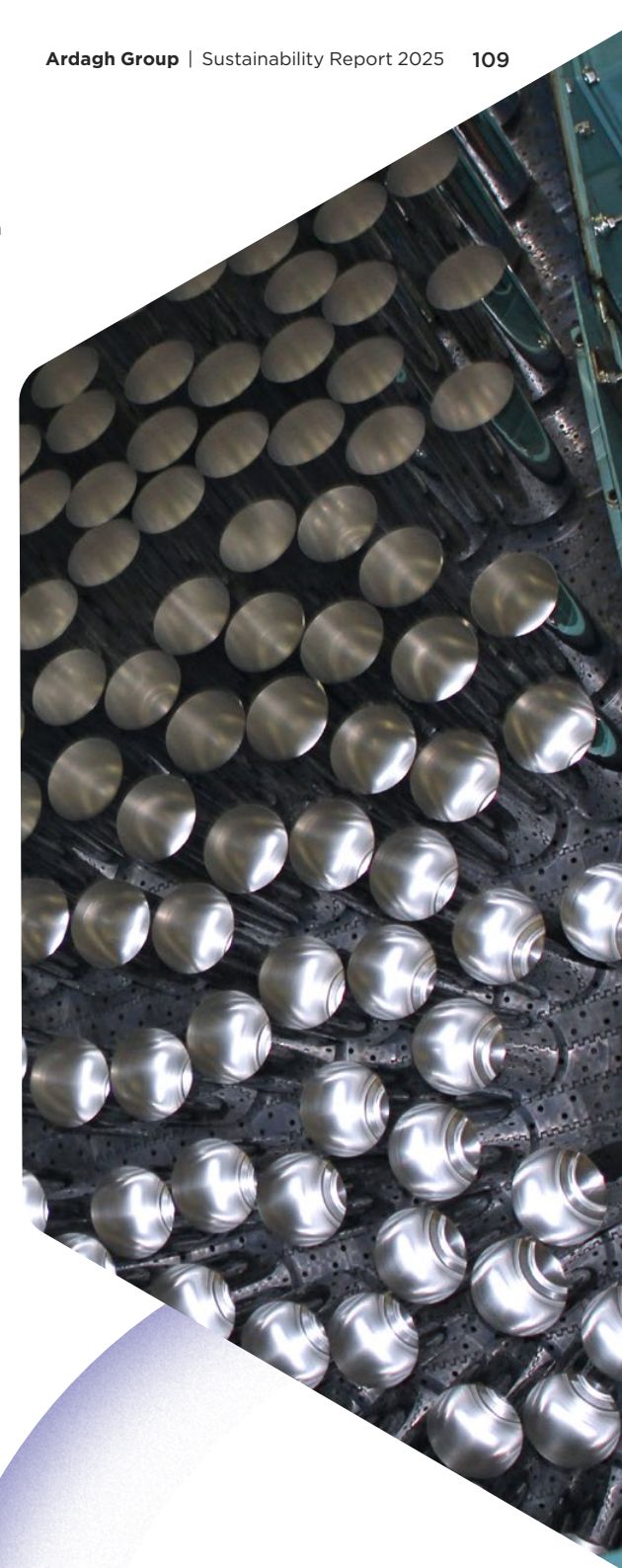
Human rights governance and training

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

Our Sustainability Committees oversee human rights at Ardagh Group and a Sustainable Supply Chain Manager is responsible for monitoring adherence to our Responsible Procurement Policy. While our governance structures are in the process of being streamlined we will continue following existing policy guidelines. We use a third-party tool to manage and monitor suppliers' human rights risks, recording 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.



S2 WORKERS IN THE VALUE CHAIN CONTINUED

Metrics and objectives

Objectives related to workers in the value chain

S2-4-19

The following objectives for 2025 were approved by the board Sustainability Committee of AGSA:

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

As regards progress to those targets, in 2025:

- We conducted social and environmental due diligence, including risk assessment and media monitoring, for 100% of our global strategic suppliers. Completion of supplier questionnaires is ongoing and forms part of our continuous improvement efforts.
- We trained 100% of procurement and logistics category managers on preventing human exploitation.

Every year we complete the EcoVadis questionnaire, which assesses the quality of our sustainability management system. In 2025, we achieved a Platinum rating, placing us in the top 1% 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 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.

All of the facilities in AMP-Europe and two facilities in AMP-South America are Aluminium Stewardship Initiative (ASI)-certified.



S3 Affected communities

Ardagh Group's operations are primarily industrial in nature and are, for the most part, in established manufacturing and industrial zones. We do not currently anticipate significant adverse impacts or material risks to affected communities arising from our own operations or value chain. Nevertheless, we recognise the importance of responsible environmental management, ethical business conduct and open channels for raising concerns and we seek to manage potential impacts through our policies, systems and controls.

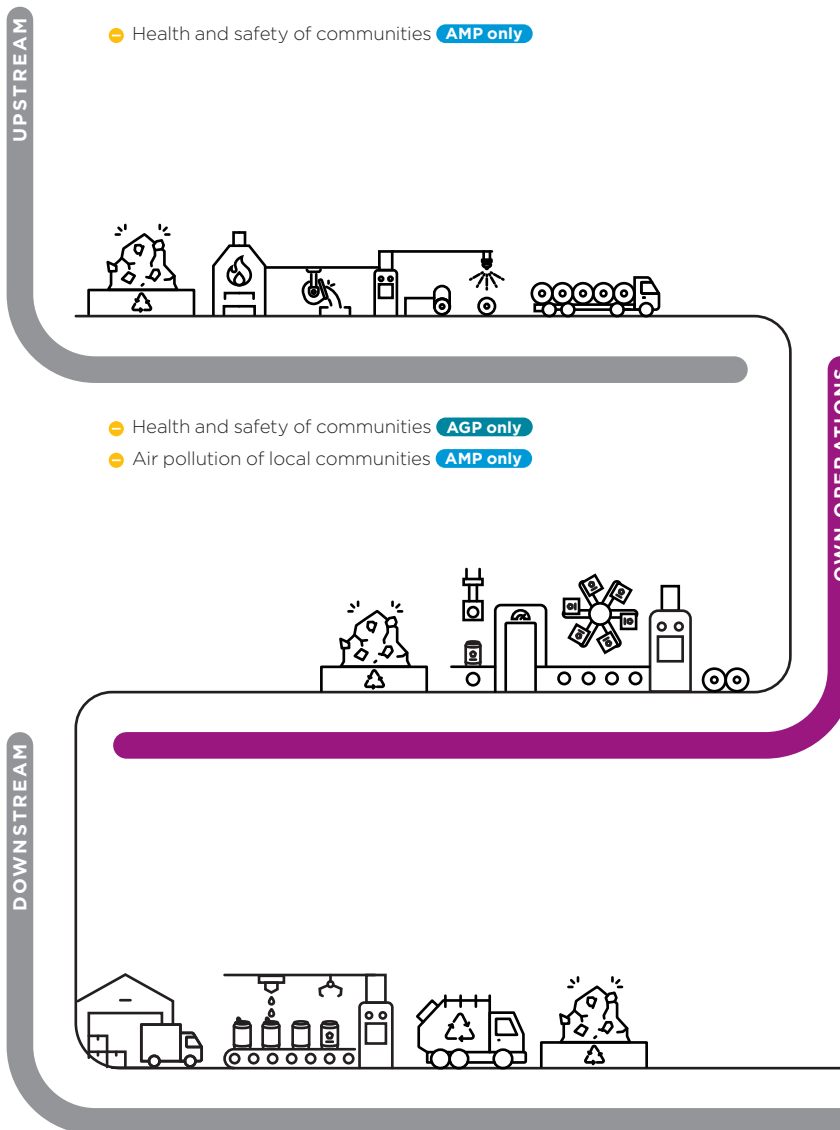
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

✓ Opportunity ✗ Risk





S3 AFFECTED COMMUNITIES CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Working conditions (including adequate wages, work-life balance, working time, secure employment and social protection)				
Health and safety of communities	Mining activities in the upstream value chain could lead to adverse effects on the health of affected local communities through environmental degradation and pollution.	-	AMP	U
	Manufacturing activities in own operations could lead to adverse effects on the health of affected local communities through environmental degradation and pollution.	-	AGP	O
Air pollution of local communities	Air emissions generated during aluminium converting processes (such as printing and lacquer application) in own operations, leading to potential deterioration of local air quality, resulting in adverse health effects for affected communities, regulatory sanctions and reputational damage.	-	AMP	O





S3 AFFECTED COMMUNITIES CONTINUED

Impact, risk and opportunity management

Policies related to affected communities

S3-1-7, 8

We manage our potential impacts on affected communities via our own operations primarily through our Environmental Policy, Social Sustainability Policy and sustainability targets and operational management systems.

Any potential upstream impacts associated with our supply chain are addressed through our Responsible Procurement Policy, which incorporates supplier due diligence processes and expectations.

These commitments are consolidated within our Code of Conduct, which applies to all employees and is communicated to suppliers and business partners. The Code of Conduct is structured around four core principles:

1

We value our people and their safety

2

We act ethically and with integrity

3

We protect our business

4

We care for our environment and communities

In addition, Ardagh Group has achieved International Organization for Standardization (ISO) 14001 certification for Environmental Management Systems (EMS) across all production facilities within both Ardagh Metal Packaging and Ardagh Glass Packaging. ISO 14001 provides a recognised framework for identifying, monitoring and managing environmental risks, supporting efficient resource management, waste reduction and continual improvement in environmental performance.



S3 AFFECTED COMMUNITIES CONTINUED

Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy

S3-2-9 to 13

We encourage all individuals to raise concerns where they observe or suspect violations of our Code of Conduct or applicable laws. To support this, we provide multiple channels, which are open to members of our local communities as well as employees, customers, suppliers and other business partners.

Our primary reporting mechanism is the Speak Up Hotline, which is operated by an independent third party to ensure confidentiality, security and impartiality. Subject to local laws, reports may be submitted anonymously.

- Our Speak Up Hotline can be accessed online via ardaghgroup.ethicspoint.com and via local toll-free numbers in all the countries in which we operate.
- In addition to our Speak Up Hotline, concerns can be raised by contacting a member of Ardagh Group's Legal & Compliance team by emailing compliance@ardaghgroup.com. There is also a [general contact form](#) on our website which can be used for all stakeholders to reach out to us.
- In line with ISO 14001, all manufacturing facilities evaluate the needs and expectations of the communities around our locations. Along with the environmental aspects and impact analyses, these evaluations inform consultation with local communities.

We take all reported concerns seriously and they are handled by qualified investigators. We do not permit retaliation or discrimination against those reporting information in good faith. Further details on how to report concerns and how we deal with reports is set out in our [Speak Up and Whistleblowing Policy](#).



S3 AFFECTED COMMUNITIES CONTINUED

Actions and resources related to affected communities

S3-3-14 to 16

Caring for our environment and our communities is a central consideration of everything that we do. We promote healthy and safe environments, employ sustainable processes and value how we interact with our communities and society in general. We recognise our responsibilities and are dedicated to the continued improvement of environmental performance throughout our business, including complying with relevant environmental laws and regulations and acting in compliance with our environmental and operational permits.

As outlined in our ESRS 2 and environmental disclosures (E1, E2, E3 and E5), we have established targets and actions to mitigate the environmental impacts arising from our direct operations, including emissions, resource use, waste and water management.

We manage potential impacts on communities from our operations and value chain through supplier engagement, responsible material choices, alternative fuels, innovative furnace technologies (like our NextGen furnace referenced in section E1 of this report), renewable electricity, process optimisation and emission control technologies. Specific initiatives are detailed elsewhere in this report, including:

- **Reducing upstream impacts from aluminium production**

Potential impacts associated with raw material extraction are primarily located upstream in the aluminium value chain.

- AMP mitigates these impacts by prioritising the procurement of aluminium with higher levels of recycled content and actively minimise the use of primary raw materials, reducing the need for new extraction activities.
- **Use of alternative materials to minimise VOCs (AMP)**
Within our own operations, we reduce potential air quality impacts by selecting alternative materials, including the use of water-based coatings, to minimise the generation of VOCs.
- **Optimisation of material use**
We continuously optimise material formulations and application processes to minimise the quantities required while maintaining strict quality and performance standards. This approach further reduces overall material consumption and associated VOC (AMP), NOx and SOx (AGP) generation.
- **Application of emission control technologies**
Where VOC use in metal packaging production cannot be fully avoided, we operate established abatement technologies, such as RTOs, to eliminate VOC emissions before release to the surrounding environment.
- **We implement combustion optimisation technologies** to mitigate NOx formation in glass production and deploy additional abatement systems, including selective catalytic reduction (SCR).





S3 AFFECTED COMMUNITIES CONTINUED

Metrics and targets

Targets related to affected communities

S3-4-17

As outlined in our ESRS 2 and environmental disclosures (E1, E2, E3 and E5) we have established environmental targets including a 10% reduction of VOC intensity by 2030 for AMP. These targets are supported by actions focused on emissions reduction, efficient resource use, waste management and water stewardship across our direct operations and our value chain.

In addition, we consistently seek to increase the use of recycled content aluminium and glass as part of our broader circularity objectives. Increasing the use of aluminium and glass with higher levels of recycled content reduces demand for extraction and production activities, which in turn helps to lessen potential impacts on local communities.





S4 Consumers and end-users

Ensuring the safety, quality and integrity of our packaging materials throughout their lifecycle is of paramount importance. Because our products come into direct contact with food and beverages, our packaging materials play a key role in protecting consumer health, and high standards of production are essential to preserving product quality. After conducting the double materiality assessment, consumers and end-users are material to AMP activities only and non-material for AGP.

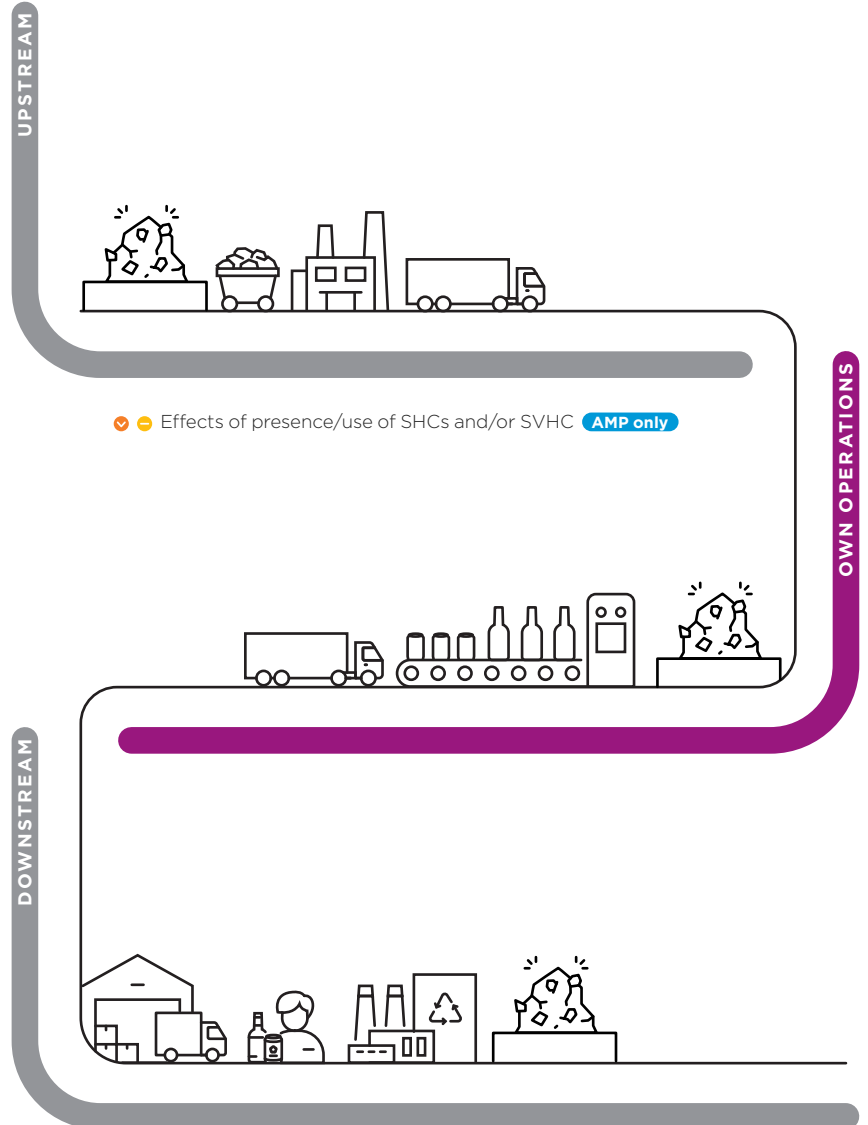
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

+ Opportunity - Risk





S4 CONSUMERS AND END-USERS CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Personal safety of consumers and/or end-users (including health and safety, protection of children, security of a person)				
Effects of presence/ use of SHCs and/or SVHC	Presence or use of SHCs or Substances of SVHCs in product materials and coatings during manufacturing, could lead to adverse health effects for consumers through exposure to hazardous substances, resulting in regulatory sanctions, remediation costs and reputational damage.	v	AMP	O
	Presence or use of SHCs or SVHCs in product materials and coatings during manufacturing, could lead to adverse health effects for consumers through exposure to hazardous substances.	-	AMP	O



S4 CONSUMERS AND END-USERS CONTINUED

Impact, risk and opportunity management

Policies related to consumers and end-users

S4-1-7

These risks apply to AMP and while policies and controls apply to the Group, this section will focus on the specific application to AMP.

AMP maintains policy governance processes aimed at protecting consumers and end-users from potential adverse health and safety impacts associated with its products. Our focus is on product quality, primarily on chemical safety in food contact materials. Given AMP's role as a business-to-business manufacturer, consumer protection is addressed through product design, material selection, regulatory compliance and supplier management, drawing on supplier declarations, compliance testing and regulatory expertise. AMP does not generally engage directly with consumers or end-users on an ongoing basis. Instead, AMP engages indirectly through:

- Customer relationships with brand owners and fillers
- Trade associations and industry initiatives on food-contact materials and sustainable packaging
- Responses to consumer-related enquiries or concerns received via public channels
- Supplier engagement

Key elements of our management framework include:

- Compliance with applicable governmental directives and regulations relating to food contact materials, chemicals and environmental legislation across the regions and countries in which we operate
- Food safety management aligned with the Global Food Safety Initiative (GFSI), with Good Manufacturing Practice (GMP) embedded within the GFSI-aligned Food Safety Management System
- A commitment to avoid the intentional use of substances of concern where technically and commercially feasible
- Supplier declarations based on supplier material data, use of good manufacturing practices during production and additional measures where required, managed in line with our Responsible Procurement practices
- Publicly accessible channels through which consumers and end-users have the option to raise concerns or request information, including a general contact form on our website through which concerns may be raised anonymously

Our contact channels (i.e. our website contact page) support AMP's commitment to responsible business conduct, product safety and remediation where necessary. Concerns raised through these channels are logged, reviewed and routed to the appropriate internal functions (e.g. Quality, Compliance, Legal) for investigation.



S4 CONSUMERS AND END-USERS CONTINUED

Actions and resources related to consumers and end-users

S4-3-12, 13

AMP's main material consumer-related impact, risk or opportunity concerns the potential presence of substances of concern in coatings and lacquers used in can bodies and ends. To manage this, AMP has implemented a combination of preventive, mitigating and remedial actions, including:

- Phasing-out and substitution initiatives
 - we are actively working with material suppliers to phase out chemicals of concern to assure compliance with regulatory requirements
- Through partnerships with our supply chain we are working towards innovations that proactively address any future challenges for the industry
- Reduction and optimisation of raw material consumption: where technically feasible, in line with our sustainability targets AMP pursues optimisation of materials, supporting both chemical risk reduction and material efficiency objectives
- Our quality control and compliance assurance is a process-driven quality and food safety management system, including:
 - Declarations of conformity based on supplier raw material data for food-safety and environmental compliance
 - Migration testing and conformity assessments in regions where applicable
 - Internal reviews against the regions where there are food contact safety requirements
- Customer engagement and complaint management: we operate formal, documented quality management procedures covering customer complaint handling, product safety incidents and product recall. These procedures include investigation, root-cause analysis, corrective and preventive actions, escalation of food safety issues and incident management processes. These are supported by approved, version-controlled documentation within AMP's Quality Management System (QMS)



S4 CONSUMERS AND END-USERS CONTINUED

Metrics and Objectives

Objectives related to consumers and end-users

S4-3-15

AMP applies a qualitative approach to managing matters related to consumers and end-users, with a focus on product safety and chemical risk management. This approach is embedded within its broader quality, product safety and chemical compliance frameworks and includes:

- Ensuring regulatory compliance, by maintaining full compliance with applicable material conformity and chemicals legislation across all markets in which AMP operates
- Driving continuous improvement, through engagement with our suppliers, customers and trade associations to support innovation, material optimisation and the responsible use of alternative substances

AMP does not currently set standalone quantitative targets specific to consumers and end-users beyond those embedded within its broader chemical compliance, food safety, product safety quality management frameworks and customer complaint management. Instead, AMP applies a system and process-driven approach to managing and mitigating risks to consumers and end-users, supported by the following monitoring and control mechanisms:

- Establishment, maintenance and continuous improvement of a process-driven Food Safety Management System that meets the requirements of the Global Food Safety Initiative (GFSI) and is certified by externally accredited certification bodies

- Monitoring of customer complaints, which are systematically monitored, analysed and trended, including assessment of complaint severity. Complaints are evaluated using KPIs and tracked relative to production volumes (for example, complaints per million products sold) to support the identification of emerging quality or product safety risks
- Customer complaints and quality deviations are subject to formal corrective and preventive action (CAPA) processes. These include defined responsibilities, target completion dates and effectiveness checks, with follow-up audits used where applicable to verify that corrective measures are sustained
- Routine end-of-line audits and daily quality checks are conducted across operations. Results are monitored using visual status indicators, enabling timely identification of and response to deviations from quality or product safety requirements
- Non-conforming materials and products are systematically identified, segregated and dispositioned in accordance with documented procedures. These processes are supported by automated inspection systems and defined escalation pathways, including procedures for issues identified after product dispatch
- AMP maintains formal incident management processes, including quality defects, food safety risks or regulatory non-compliance. These processes are supported by traceability systems and regular assessments of recall readiness
- Performance monitoring and continuous improvement: quality-related key performance indicators (KPIs) are reviewed through standardised dashboards and reporting tools, providing ongoing visibility of site-level quality performance and supporting continuous improvement activities
- Management review of the Quality Management System: the effectiveness of the Quality Management System is evaluated through formal management reviews, which assess system suitability, adequacy and effectiveness and define improvement actions where necessary

To date, AMP has not identified substantiated consumer or end-user human rights incidents related to product health and safety.



G1 Business conduct

123

Governance

Committed to operating
with the highest standards
of integrity and honesty





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 Executive Chairman and CEOs set a clear tone from the top, promoting the Code and everything we stand for across Ardagh Group.

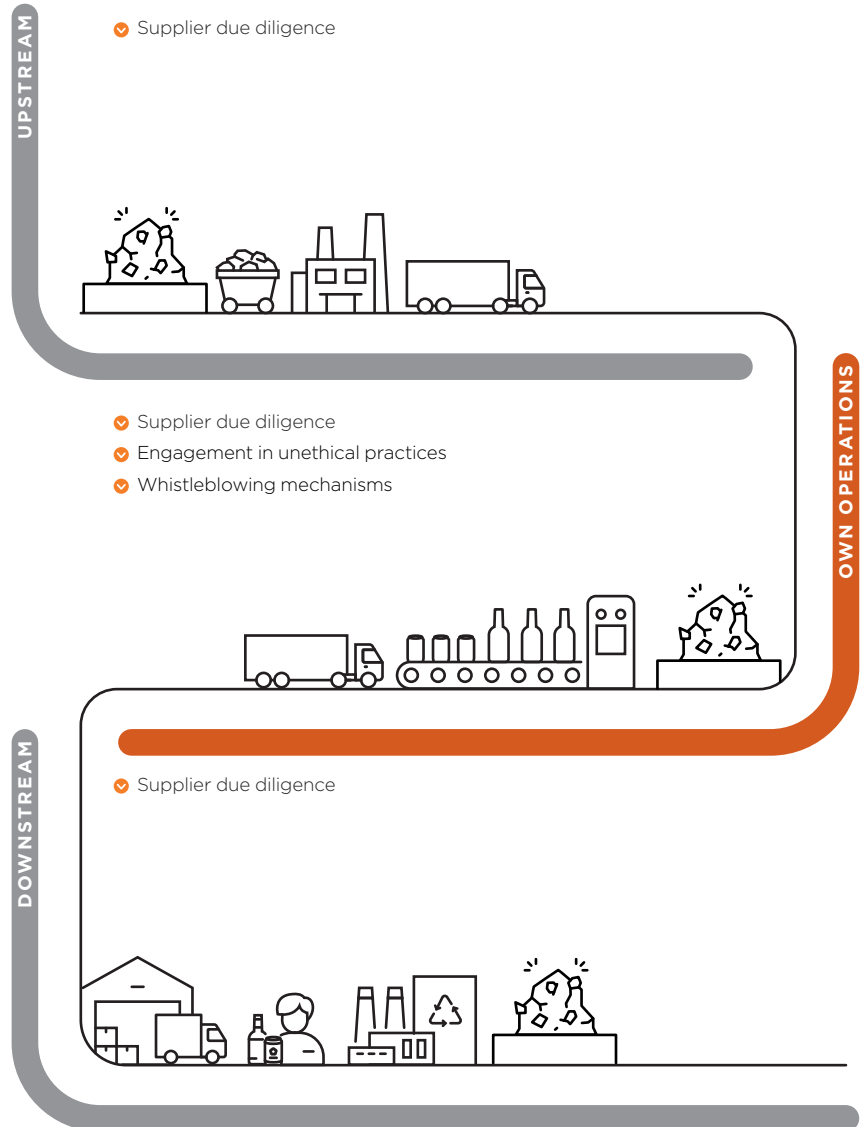
IMPACTS, RISKS AND OPPORTUNITIES

Impact materiality

+ Positive - Negative

Financial materiality

+ Opportunity - Risk





G1 BUSINESS CONDUCT CONTINUED

Impact, risks and opportunities

IRO type

+ Positive - Negative ^ Opportunity v Risk

Entity

GROUP Ardagh Group AMP Ardagh Metal Packaging AGP Ardagh Glass Packaging

Value chain stage

U Upstream O Own operations D Downstream

IRO title	Description of material IRO	IRO type	Entity	Value chain stage
Management of relationships with suppliers, including, payment practices especially late payment to small- and medium-sized enterprises (SMEs)				
Supplier due diligence	Failure to conduct adequate supplier due-diligence checks could lead to unidentified environmental, social or governance risks within the supply chain, resulting in supply-chain disruption and potential reputational harm to the organisation.	v	GROUP	U O D
Corporate culture, including anti-corruption and bribery, the protection of whistleblowers and animal welfare				
Engagement in unethical practices	Engagement in unethical practices could lead to regulatory investigation and loss of trust, resulting in penalties and financial and reputational damage.	v	GROUP	O
Whistleblowing mechanisms	Inadequate or ineffective whistle-blower mechanisms for reporting concerns about the company's own operations or its supply chain could lead to potential undetected mismanagement and unethical behaviour, resulting in legal and regulatory exposure, financial losses and reputational damage.	v	GROUP	O



G1 BUSINESS CONDUCT CONTINUED

Impact, risk and opportunity management

Policies related to business conduct

G1-1-5, 6, G1-2-8(b)

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, the HR team, Ardagh Group Legal team, or reporting via our Speak Up Hotline.

A failure to comply with our Code, policies or applicable laws may result in disciplinary action, up to and including termination of employment.

In addition to our Code, and in line with the United Nations Convention against Corruption, we maintain an Anti-Bribery and Corruption Policy. This policy sets out our zero-tolerance approach to bribery and corruption, as well as the procedures designed to support compliance with applicable laws, including the U.S. 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 our 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.

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, as detailed in our Speak Up and Whistleblowing Policy, which complies with legal requirements under relevant national laws transposing the EU Whistleblowing Directive (Directive (EU) 2019/1937).

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, as well as those operating in high-risk countries, are required to undertake enhanced training on the prevention of bribery and corruption.





G1 BUSINESS CONDUCT CONTINUED

Actions related to business conduct

G1-2-7, 8

Protection of whistleblowers

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. Third parties are also encouraged to speak up if they have concerns, including to their main business contact or directly with our Legal and Compliance team.

In addition, our Speak Up Hotline is available to employees, customers, suppliers, and other third parties, enabling them to raise concerns anonymously in a confidential, secure, and effective manner. The hotline is operated by an independent third party, with strict access controls to ensure that each case is accessible only to those responsible for its investigation.

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 protected against any form of retaliation or discrimination.

All employees are provided with training about speaking up, including how to use the Speak Up Hotline and our commitment to protect reporters from retaliation or discrimination. Details of our Speak Up Hotline are made clear to third parties via our website, as well as being explicitly set out in our Responsible Procurement Policy which applies to our suppliers.

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. Since 2024, we have provided all employees with a bespoke business and ethics compliance training programme. In addition to courses on our Code and speaking up, which are required to be completed annually, the programme covers anti-bribery and corruption, conflicts of interest, privacy and fraud prevention.





G1 BUSINESS CONDUCT CONTINUED

Management of relationships with suppliers

Responsible procurement

One of our procurement strategy pillars is building a strong future and becoming a leader in sustainability. Both AMP and 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 2025, we revised our Responsible Procurement Policy to properly reflect our principles, as well as reviewing our ways of working and upskilling our colleagues. We continued this process in 2025.

All our procurement activities comply with applicable laws and regulations based on our sourcing and operating locations, 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 met and align with our business and sustainability strategies.

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 launched 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, both businesses continued to develop their 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.

Procedures to prevent, detect, investigate and respond to allegations or incidents of corruption or bribery

Ardagh Group maintains a zero-tolerance approach to bribery and corruption, supported by its Anti-Bribery and Corruption Policy and related procedures. Preventive measures include: risk-based due diligence and approval requirements for agents and intermediaries, supported by an agents register; regular bribery and corruption risk assessments with enhanced focus on higher-risk jurisdictions; and tailored training for employees.

All employees receive baseline training on bribery and corruption, with enhanced training provided either via our myLearning platform or in face-to face or live online sessions for roles exposed to higher risks.

Where we become aware of, or receive any allegations related to, bribery or corruption, including allegations of breaches of our procedures, our Group Compliance Director will undertake an investigation. If individuals are found not to have complied with our policies or procedures they may face disciplinary action, up to and including termination of employment.



G1 BUSINESS CONDUCT CONTINUED

Metrics

Metrics related to corruption or bribery

G1-4-10, 11

During the reporting period we did not face any convictions or sanctions for violations of anti-corruption or anti-bribery laws, nor during the reporting period were we subject to any investigations on this topic.

Metrics related to political influence, including lobbying activities

G1-5-12 to 14

Our lobbying activities focus on the EU Packaging and Packaging Waste Regulation (PPWR), with the objective of enabling a smooth implementation for AGP, AMP and the wider value chain. A key priority is supporting clear, practical requirements, particularly for the first phase of compliance, including documentation and declarations of conformity (DoC).

A central topic is the export of aluminium scrap. We advocate, alongside stakeholders, for keeping aluminium scrap within Europe, as current export levels reduce the availability of recycled material. This directly affects recycled content in our cans and our ability and that of our customers to meet climate and circularity targets.

Engagement is exclusively conducted through industry associations, where we take an active role to support a harmonised single EU market and consistent regulatory interpretation. In addition, we engage with customers on green claims to help mitigate regulatory and reputational risks and ensure compliance with legal requirements.

These activities address material regulatory, supply-chain and climate-related risks while supporting long-term opportunities linked to decarbonisation and circular economy objectives.





ESRS 2 Disclosure requirements	130
ESRS 2 Data points that derive from other EU legislation	133

Appendix

Investing in a
more sustainable
future across the
Ardagh Group





APPENDIX CONTINUED

ESRS 2 Disclosure requirements

IRO-2-37(d)

Disclosure reference	Description	Page number
ESRS 2		
BP-1-4(a)	Basis for preparation	7
BP-1-4(b)	Extent the sustainability report covers our value chain	8
BP-1-6	Exemptions and omitted information	8
BP-1-5	Reporting frameworks and standards	8
BP-1	Disclosure in relation to specific circumstances	9
GOV-1-11	The role of the administrative, management and supervisory bodies	10
GOV-1-12	Sustainability matters addressed by the administrative and supervisory bodies	11
GOV-2-13	Integration of sustainability-related performance in incentive schemes	11
GOV-4-17	Risk management and internal controls over sustainability reporting	11
SBM-1-19	Strategy, business model and value chain	12
SBM-1	Sustainability-related goals	14
SBM-1-20	Features of its upstream and downstream value chain	14
SBM-2-21	Interests and views of stakeholders	17
SBM-3-23	Impacts, risks and opportunities	19
IRO-1-34, IRO-2-37	Double materiality assessment	20
E1		
E1-1-10	Transition plan for climate change mitigation	28
E1-2-13	Identification of climate-related risks	34
E1-3-17	Resilience in relation to climate change	35
E1-4-19	Policies related to climate change mitigation and adaptation	36
E1-5-20	Actions and resources in relation to climate change mitigation and adaption	37
E1-6-22	Targets related to climate change	38
E1-7-24	Energy consumption and mix	40
E1-8-28	Gross Scopes 1, 2, 3 GHG emissions	41
E1-10	Internal carbon pricing	43
E1-11-37	Anticipated financial effects	43



APPENDIX CONTINUED

Disclosure reference	Description	Page number
E2		
E2-1-10	Policies related to pollution	48
E2-2-11	Actions and resources related to pollution	49
E2-3-12	Targets related to pollution	51
E2-4-13	Pollution of air	51
E3		
E3-1-9	Policies related to water	55
E3-2-11	Actions and resources related to water	56
E3-3-13	Targets related to water	59
E3-4-14	Water metrics	59
E4		
E4-2	Policies related to biodiversity and ecosystems	62
E4-3	Actions and resources related to biodiversity and ecosystems	63
E4-4	Targets related to biodiversity and ecosystems	66
E5		
E5-1-8	Policies related to resource use and circular economy	69
E5-2-10	Actions and resources related to resource use and circular economy	70
E5-3-11	Targets related to resource use and circular economy	71
E5-4-12	Resource inflows	74
E5-5-14	Resource outflows- products	76
E5-5-16	Resource outflows- waste	77
S1		
S1-1-9	Policies related to own workforce	83
S1-2-11	Engagement with own workforce and workers' representatives	84
S1-2-13	Existence of channels for own workforce to raise concerns or needs and approaches to remedy	85
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities	84
S1-5-18	Characteristics of the undertaking's employees	86
S1-7-22	Collective bargaining coverage and social dialogue	88
S1-8-25	Diversity metrics at top management level	89



APPENDIX CONTINUED

Disclosure reference	Description	Page number
S1 continued		
S1-9-27	Adequate wages	90
S1-10-29	Social protection	91
S1-12-33	Training and skills development	91
S1-13-35	Health and safety metrics	95
S1-14-37	Work-life balance metrics	95
S1-15-39	Remuneration metrics	98
S1-16-41	Incidents of discrimination and other human rights incidents	99
S2		
S2-1-9	Policies related to value chain workers	106
S2-2-12	Engagement with workers in the value chain	107
S2-16	Actions and resources related to workers in the value chain	108
S2-4-19	Objectives related to workers in the value chain	110
S3		
S3-1-7	Policies related to affected communities	113
S3-2-9	Engagement with affected communities	114
S3-3-14	Actions and resources related to affected communities	115
S3-4-17	Targets related to affected communities	116
S4		
S4-1-7	Policies related to consumers and end-users	119
S4-3-12	Actions and resources related to consumers and end-users	120
S4-3-15	Objectives related to consumers and end-users	121
G1		
G1-1-5	Policies related to business conduct	125
G1-2-7	Actions related to business conduct	126
G1-4-10	Metrics related to corruption or bribery	128
G1-5-12	Metrics related to political influence, including lobbying activities	128



APPENDIX CONTINUED

ESRS 2 Data points that derive from other EU legislation

IRO-2-37(g)

Disclosure Requirement	Data point Sustainability Reports/Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Page number
ESRS 2 GOV-1	Percentage of board members who are independent			Delegated Regulation (EU) 2020/1816, Annex II			10
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities	Indicator number 4 Table #1 of Annex I	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	
	Involvement in activities related to chemical production	Indicator number 9 Table #2 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not applicable to Ardagh Group	
	Involvement in activities related to controversial weapons	Indicator number 14 Table #1 of Annex I		Delegated Regulation (EU) 2020/1818 (29), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not applicable to Ardagh Group	
	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	
ESRS E1-1	Transition plan for climate change mitigation				Regulation (EU) 2021/1119, Article 2(1)		28
ESRS E1-6	GHG emission reduction targets	Indicator number 4 Table #2 of Annex I	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 6			38
	Gross Scope 1,2, 3 and Total GHG emissions	Indicators number 1 and 2 Table #1 of Annex I	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)			41



APPENDIX CONTINUED

Disclosure Requirement	Data point Sustainability Reports/Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Page number
ESRS E1-7	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 I					40
	Energy consumption and mix	Indicator number 5 Table #1 of Annex I					40
ESRS E1-9	GHG removals and carbon credits				Regulation (EU) 2021/1119, Article 2(1)		41
ESRS E2-4	Amount of each pollutant listed in Annex II of the EPRTTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	Indicator number 8 Table #1 of Annex I Indicator number 2 Table #2 of Annex I Indicator number 1 Table #2 of Annex I Indicator number 3 Table #2 of Annex I					51
ESRS E3-1	Water-related policies	Indicator number 7 Table #2 of Annex I					55
	Policy covering areas with-water stress	Indicator number 8 Table #2 of Annex I					59
ESRS E3-4	Total water recycled and reused	Indicator number 6.2 Table #2 of Annex I					59
ESRS E4-2	Policy covering sites in or near biodiversity sensitive areas	Indicator number 14.2 Table #2 of Annex I					63
ESRS E4-5	Activities negatively affecting biodiversity sensitive areas	Indicator number 7 Table #1 of Annex I					62
ESRS E5-5	Hazardous waste and radioactive waste	Indicator number 9 Table #1 of Annex I					77
ESRS 2 - IRO-2	Risk of incidents of forced labour	Indicator number 13 Table #3 of Annex I					99
	Risk of incidents of child labour	Indicator number 12 Table #3 of Annex I					99
ESRS 2 GDR-P	Human rights policy commitments	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I			Delegated Regulation (EU) 2020/1816, Annex II		83



APPENDIX CONTINUED

Disclosure Requirement	Data point Sustainability Reports/Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Page number
ESRS S1-1	Occupational risk prevention policy or management system	Indicator number 1 Table #3 of Annex I					95
ESRS S1-2	Grievance mechanism, including employee related matters	Indicator number 5 Table #3 of Annex I and Indicator number 11 Table #1 of Annex I					85
ESRS S1-13	Rate of work-related accidents	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			95
	Number of days lost to injuries, accidents or illness	Indicator number 3 Table #3 of Annex I					95
ESRS S1-15	Unadjusted gender pay gap	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			90
ESRS S1-16	Incidents of discrimination paragraph	Indicator number 7 Table #3 of Annex I					99
	Human rights incidents	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			99
ESRS S2-1	Processes and measures for preventing trafficking in human beings	Indicator number 11 Table #3 of Annex I					106
	Code of conduct	Indicator number 4 Table #3 of Annex I					106
ESRS S2-2	Grievance mechanism	Indicator number 11 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)			107
ESRS S2-3	Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			99
ESRS S3-3	Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			99
ESRS S4-2	Grievance mechanism	Indicator number 11 Table #1 of Annex I					107
ESRS S4-3	Human rights incidents	Indicator number 10 Table #1 of Annex I and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II			99



APPENDIX CONTINUED

Disclosure Requirement	Data point Sustainability Reports/Appendix	SFDR reference	Pillar 3 reference	Benchmark regulation reference	EU Climate Law reference	Section	Page number
ESRS G1-1	Policies consistent with United Nations Convention against corruption	Indicator number 15 Table #3 of Annex I					125
	Protection of whistle-blowers	Indicator number 6 Table #3 of Annex I					126
ESRS G1-4	Convictions and fines for violation of anti-corruption and anti-bribery laws	Indicator number 17 Table #3 of Annex I					128

