

# MODERN SLAVERY STATEMENT

ISSUE DATE: JUNE 27, 2023



Trivium Packaging (Trivium) offers customers around the world innovative and sustainable packaging solutions supported by scalable production and outstanding customer service. We operate 59 locations across 19 countries worldwide, employ approximately 7,400 employees and have a group revenue of \$3.279 billion as of December 31, 2022.

Trivium recognises that it has a responsibility to take a robust approach to modern slavery and we are committed to improving our practices to combat modern slavery (including child labour, slavery, forced labour and human trafficking), both in our own organisation and our supply chains.

This statement is made by Trivium Packaging B.V. and its subsidiaries pursuant to the California Transparency in Supply Chains Act 2010 and also serves as the statement for Trivium Packaging UK Limited for the financial year ending 31 December 2022, as required pursuant to section 54(1) of the Modern Slavery Act 2015.

We hereby report on the steps we have taken during 2022 to combat modern slavery.

## **Our business and supply chains**

Trivium's business is organised into business units across three main geographic areas. Our North and South American operations include 9 production facilities. Our European, African and Asian operations include 40 production facilities.

As is to be expected from a large metal packaging manufacturer, Trivium receives a significant amount of materials and services. Key supply chains are critical to the business, and as such, are managed as commodities, under the responsibility of global and regional managers. Key supply to our process includes: energy, raw materials, packaging and logistics. These commodities have a chosen consolidated number of suppliers who can serve the regions with multi-year service contracts or pricing agreements, which include certain service level agreements and key performance indicators to ensure quality of supply.

## **Our approach and policies**

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. Trivium supports this commitment in its Code of Conduct which was published in 2020 and a Code of Conduct eLearning was rolled out to employees in 2021 and 2022.

Specifically, Trivium is committed to protecting human rights and fighting against modern slavery. Trivium also respects fundamental employment rights, including rights of freedom of association and collective bargaining.

We encourage staff to report any concerns relating to non-compliance with laws (including any modern slavery issues) either directly to management or through a hotline, which is available by phone or online to all staff so that they can report easily and on an anonymous basis, without fear of retaliation or discrimination. Trivium also introduced a compliance certification process in 2022, which is a self-assessment where a number of employees across Trivium have to certify that they are not aware of any violations of our Code of Conduct.

In addition, we have other policies, procedures and documentation that seek to minimise the risk associated with modern slavery. In 2020, we put in place a Responsible Procurement Policy, revised and renamed as Trivium's Supplier Code of Conduct. This Supplier Code of Conduct, available on our website and incorporated in our purchasing agreements. It includes a set of mandatory requirements for working with Trivium, and clarifies our global expectations for our supply chain partners in areas including human rights, bribery and fraud, modern slavery, conflict minerals, health and safety and business integrity.

In 2022, we took the additional step of requiring our top 200 suppliers to sign off on our Supplier Code of Conduct to further confirm that they have read, understood and adhere to it. At the time of publication of this Statement, 79% of these suppliers had already either signed off on our Supplier Code of Conduct or presented us with their own Code of Conduct, which we judged to be of a similar level of stringency as ours.

### **Our risk assessment, due diligence processes and supply chain verification**

We have a risk-based management system which helps us identify and manage potential social, ethical, and environmental risks, including modern slavery risks, across our supply chain. Below we set out the detail of how we seek to verify our supply chains, audit suppliers and obtain supplier certifications.

#### **Desktop risk assessment**

An in-depth risk assessment is conducted on a selection of suppliers. We take multiple factors into consideration when deciding which suppliers to focus on, including their industry, geography and the risk of human rights abuses (including modern slavery). We also continually monitor media sources to ensure that we remain alert to potential risks within our supply chains.

When completing the risk assessment for 2022 we invited our top 200 suppliers to respond to an annual questionnaire on a broad range of environmental, social and governance (ESG) topics, including environmental management, CO2 emissions and workplace controls. We use the results to create a sustainability scorecard for each of our suppliers, allowing us to monitor their ESG performance over time and keep track of the initiatives they have in place. Suppliers are reassessed on a rotational basis. In 2022, 85% of our top 200 suppliers completed the questionnaire, representing around 83% of our total purchase spend for the year.

#### **Onsite assessments & third-party audits**

Based on the outcome of the desktop risk assessment, a supplier may be required to undergo either an on-site assessment conducted by one of our representatives or an ethical audit by a 3rd party. Both the audit and assessment include content related to modern slavery.

We consider third-party audits to be preferential for suppliers within higher risk geographies, as local auditors are often best equipped to understand the local regulatory landscape and challenges. In 2022, a total of 7 on-site supplier audits were conducted.

## **Contracts and certification**

To ensure that our suppliers respect and enforce our standards, including as regards ethical trading, our key supply contracts require suppliers to comply with all applicable laws and regulations. Moreover, these requirements are set out in Trivium's general terms and conditions of purchase.

We also have additional certification requirements for suppliers of certain products. For example, to ensure that no conflict-based tin enters our production processes, in accordance with our legal obligations, we require suppliers of tin products to provide relevant declarations.

If there is evidence that there may be conflict-based tin in a supplier's process, we require them to provide us with appropriate due diligence regarding the mineral supply chain.

## **Training about Modern Slavery**

We focus on socially responsible and environmentally sustainable sourcing, including in relation to modern slavery issues. This had led to increased awareness across the business at all levels, including through presentation of such issues to senior management.

Topics related to modern slavery are presented to our key procurement managers and we are training employees responsible for procurement decisions on compliance topics, which includes modern slavery.

In addition, a training for suppliers will be provided in 2023, and modern slavery will be part of this training.

## **Responsibility and Effectiveness**

Trivium remains committed to upholding human rights and safety in our supply chain and we will be reviewing our progress and effectiveness in combatting slavery and human trafficking on an annual basis.

During the period covered by this statement, we have found no evidence, nor received any allegations, of modern slavery either within Trivium or within our suppliers.

Digitally signed by: Michael Mapes, Chief Executive Officer and Charlotte van Meer, Chief Legal Officer, Trivium Packaging B.V.

Incorporated and approved by the board of directors of Trivium's UK subsidiary, Trivium Packaging UK Holdings Limited, also on behalf of its subsidiaries.