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CONFLICT MINERALS REPORT 2026

ISSUE DATE: November 2026

Background

Conflict minerals, also known as 3TG, are defined as minerals or metals containing or consisting of tin, tantalum, tungsten or gold (collectively, “Conflict Minerals”). In politically unstable areas, the minerals trade can be used to finance armed groups, fuel forced labor and other human rights abuses, and support corruption and money laundering.

Introduction

As one of the global leaders in metal packaging solutions, Trivium Packaging B.V. and its subsidiaries ("Trivium") is committed to the responsible sourcing of the minerals which are needed for the manufacturing of our products.

Our steel packaging products are made from tinplate, which contains tin, one of the metals included in the definition of Conflict Minerals. Tin is one of the minerals which could be linked to armed conflicts and related human rights abuses. We work continuously with the aim of ensuring that tin is sourced responsibly and does not contribute to conflicts or other related illegal activities.

Our ambition

At Trivium, we are committed to responsible sourcing throughout our supply chain. To uphold this commitment, we maintain an ongoing due diligence process and diligently monitor and verify our suppliers' sourcing practices. Additionally, we collaborate closely with our suppliers to identify alternative solutions, such as tin-free steel, to further reduce our dependency on Conflict Minerals and promote sustainable sourcing practices.

This Report describes our supply chain due diligence process for Conflict Minerals and asserts our commitment to comply with the EU Conflict Minerals Regulation 2017/821 (the “Regulation”), but also the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

The reporting period for this report covers the calendar year 2025. This report is based on information provided by our suppliers through our reasonable country of origin inquiry and risk-based due diligence measures. We depend on our suppliers for the accuracy of the information they provide about the smelters or refiners they use.

Due Diligence

Our due diligence program for Conflict Minerals is designed according to the Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (the “OECD Guidance”). Trivium follows these 5 steps:

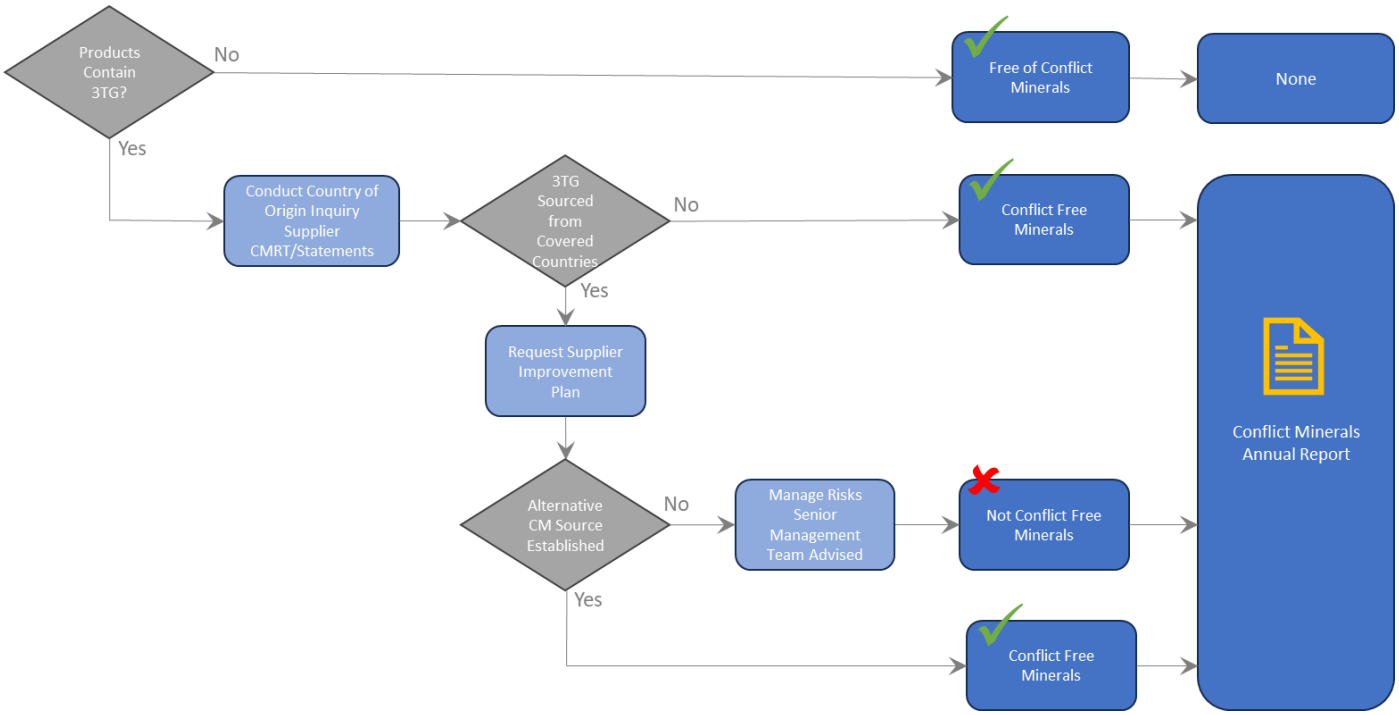
- Step 1: Establish strong company management systems
- Step 2: Identify and assess risks in the supply chain

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- Step 3: Design and implement a strategy to respond to identified risks
- Step 4: Conduct independent third-party audit of supply chain due diligence at identified points in the supply chain
- Step 5: Report annually on supply chain due diligence

Below is a detailed overview of our Conflict Minerals due diligence process flow:

Due Diligence Process Flow



Step 1: Establish strong company management systems

Policies on conflict minerals

Trivium is committed to conflict-free tin sourcing, as outlined in our Code of Conduct and Supplier Code of Conduct. Our suppliers of products containing tin need to demonstrate traceability and accountability of the raw materials they delivered to us, including disclosing the smelter base in accordance with the CMRT. Our Suppliers are required to sign our Supplier Code of Conduct or provide their own Code of Conduct which has to predominantly meet our standards.

Governance & resources

Managing Conflict Minerals at Trivium involves a collaborative effort between Procurement, Legal & Compliance and Sustainability. Procurement leads supplier engagement and the collection of supplier information, Legal & Compliance provides oversight of regulatory requirements and due diligence processes, and Sustainability supports program coordination and external reporting. Together, these teams conduct annual due diligence activities, review supplier responses and prepare Trivium's Conflict Minerals reporting. Relevant due diligence

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records, including supplier responses and supporting documentation, are retained in accordance with Trivium's document retention practices. This process is supported by Trivium's leadership team, including the Chief Operating Officer, to facilitate timely communication, supplier follow-up and corrective action where needed.

In September 2023, Trivium also became a member of the Responsible Minerals Initiative (RMI). By joining, Trivium aims to further enhance our responsible minerals sourcing program, conduct a due diligence review of our supply chain and develop best practices aligned with international standards.

Step 2: Identify and assess risks in the supply chain

All tinplate manufacturers are required to share a CMRT on an annual basis. All tinplate traders and component suppliers are also requested to share their CMRT annually, in exceptional cases, we will accept conflict-free mineral statements. The Procurement team is responsible for engaging with suppliers who need guidance on completing the CMRT and addressing questions regarding conflict minerals. Direct communication (including email) is used to engage with suppliers for conflict minerals reporting. Follow-up communications are initiated if there is no response or cooperation from suppliers. Specific steps taken:

1. Information collected from multiple open data sources (e.g. RMI, European Commission)

2. A Reasonable Country of Origin Inquiry ("RCOI") is conducted with all relevant suppliers to determine whether any Conflict Minerals in their products originate from the Democratic Republic of the Congo or an adjoining country ("Covered Countries").

3. For upstream actors (e.g. smelters), the conformant list is updated to ensure smelters and refiners successfully completed an assessment against the Responsible Minerals Assurance Process ("RMAP") standard or an equivalent cross recognized assessment.

4. The RMI's CMRT is used to obtain sourcing information from our direct suppliers i.e. upstream companies of tinplate and tinplate components.

5. All tinplate suppliers (including tinplate producers, traders and component suppliers) are asked annually to provide a copy of their CMRT and/or conflict-free mineral statement.

6. Information provided in the CMRT is checked for completeness and compliance. The Procurement department tracks progress and outcome of the analysis on an ongoing basis.

2026 Supplier Survey Results (for Calendar Year 2025)

During the reporting period, 35 suppliers were identified as in scope, comprising tinplate manufacturers, traders and component suppliers. Trivium received a CMRT or conflict-free mineral statement from all 35 suppliers, representing a response rate of 100%.
Based on the supplier CMRTs received, Trivium identified 14 unique tin smelters potentially present in its supply chain. Of these, 13 were included on the RMI Conformant Smelter List, while one smelter had been removed from the list in 2024 because it was no longer operating as a smelter or refiner.

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Based on the due diligence activities performed during the reporting period, Trivium did not identify any evidence that tin used in products supplied to Trivium directly or indirectly financed or benefited armed groups in Covered Countries. No high-risk sourcing issues requiring corrective action or supplier disengagement were identified.
Trivium will continue to monitor its supply chain, engage with suppliers and strengthen its due diligence program in accordance with the OECD Guidance.

Step 3: Design and implement a strategy to respond to identified risks

If suppliers fail or refuse to respond to our questions regarding Conflict Mineral issues after several attempts, a formal notice outlining the relevant regulations and consequences of noncompliance will be sent to them. Identified risks will also be communicated to the leadership team, including the Chief Operating Officer. Appropriate follow-up actions and corrective action plans will be implemented. If any of our suppliers is found to be supplying us with 3TG from Covered Countries that support conflicts, we may request the supplier to establish an alternative source of 3TG.

Step 4: Conduct independent third-party audits of supply chain due diligence at identified points in the supply chain

As a downstream manufacturer, Trivium does not conduct direct audits of smelters or refiners. Instead, Trivium relies on independent third-party assessments conducted through the Responsible Minerals Assurance Process (RMAP) and equivalent cross-recognized assessment programs. Trivium uses the RMI Conformant Smelter List to review the assessment status of smelters and refiners identified through supplier CMRTs.

Step 5: Report on supply chain due diligence

Trivium annually discloses its Conflict Minerals report on its public corporate website and in its annual Sustainability Report. Internal records of due diligence findings are maintained for traceability purposes.

Reporting concerns

Individuals with concerns or that wish to report on Conflict Minerals, including but not limited to suspected extraction, trade and handling of minerals from high-risk area in our supply chain, can contact our Legal & Compliance department via email at legalandcompliance@triviumpackaging.com. The identity of the individual submitting a report (if provided) will be kept confidential as long as it does not hinder or frustrate any follow-up investigation. Trivium will not tolerate the harassment or victimization of anyone who raises a genuine concern in good faith. Any allegation of retaliation will be investigated promptly and may result in disciplinary action.

Annex

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- Conflict Minerals Reporting Template (responsiblemineralsinitiative.org)

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Signed by:
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Michael Mapes
Chief Executive Officer
Trivium Packaging

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Andrew Vanstone
Chief Operating Officer
Trivium Packaging