

## MODERN SLAVERY STATEMENT

ISSUE DATE: MAY 28, 2025

Trivium Packaging ('Trivium'), headquartered in Schiphol, the Netherlands, is a leading supplier of innovative, value-added, rigid metal packaging solutions, designed to protect the products they contain and the people who use them. We operate 61 locations across 19 countries worldwide, employ approximately 7,350 employees and have a group revenue of \$2.937 billion as of December 31, 2024.

Trivium recognises its responsibility to take a strong stance against modern slavery. We are committed to improving our practices to combat modern slavery (including child labour, slavery, forced labour and human trafficking), within our organisation and supply chains.

This statement is made by Trivium Packaging B.V. and its subsidiaries pursuant to the California Transparency in Supply Chains Act 2010, on behalf of Trivium Packaging Canada Limited under the Canadian Fighting Against Forced Labor and Child Labor in Supply Chains Act 2024 ("Canadian Act"). It also serves as the statement for Trivium Packaging UK Holdings Limited for the financial year ending 31 December 2024, as required by section 54(1) of the Modern Slavery Act 2015.

We hereby report on the steps we have taken during 2024 to combat modern slavery and child labor.

### 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, while our European, African and Asian operations include 40 production facilities.

Our products primarily include steel and rigid aluminium packaging solutions for end-use categories such as beauty and personal care, beverages, food, home care and industrial, nutrition, paints and coatings, pet food, pharmaceuticals, seafood, vitamins, supplements and over-the-counter packaging.

As 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 any part of our business. Trivium supports this commitment in its Code of Conduct which is addressed in annual Code of Conduct eLearnings rolled out to employees. In 2024, we launched a refresher training on the Code of Conduct for all employees. The completion rates at the moment of writing this statement for employees with a Trivium online account was 97.5%.

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, available by phone or online to all staff, allowing them to report easily and anonymously without fear of retaliation or discrimination. At the end of 2024, we launched a Speak Up! awareness campaign, with new posters developed for the screens at all Trivium offices and plants. The Company also recently introduced a Non-Retaliation Policy. In the Code of Conduct eLearnings, employees must certify that they are not (directly or indirectly) involved in any violations of our Code of Conduct, which include forced and child labour.

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. Trivium's Labour and Human Rights Policy sets out these fundamental employment rights and their principles in relation to human rights. This important Policy applies to everyone who works for Trivium, from employees to (sub)contractors, but also to third parties conducting business on our behalf or in our name (e.g., agents, consultants), wherever in the world. Trivium has published this Labour and Human Rights Policy and other policies on its intranet which is accessible to Trivium employees.

Trivium's own operations sit within a wider value chain that includes hundreds of suppliers, each with a critical role to play in enabling us to create and deliver metal packaging. It is therefore vital that we select responsible suppliers that align with our Supplier Code of Conduct. This Supplier Code of Conduct which is available on our website and incorporated in our purchasing agreements and general terms & conditions of purchase, includes a set of commitments 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, discrimination and diversity, equity, inclusion & belonging (DEIB) and business integrity. Trivium's Supplier Code of Conduct is regularly updated. The current Supplier Code of Conduct v1.2 was launched in October 2023 and is available on the Trivium intranet and internet pages.

Trivium works in accordance with its internal Sustainable Procurement Guidelines, which outline the Environmental, Social and Governance (ESG) standards that our suppliers are expected to meet. These guidelines include a range of practices, such as integrating ESG assessments into vendor selection, promoting ESG practices across our supply chain, defining expectations through our Supplier Code of Conduct, and conducting regular supplier ESG assessments and audits. These Guidelines serve as a complement to Trivium's Global Procurement Policy, and a useful handbook for our procurement team to further promote Trivium's commitment to fostering a sustainable supply chain.

When selecting new vendors, Trivium's Procurement team evaluates their ESG practices based on a series of criteria outlined in the Sustainable Procurement Guidelines. Once suppliers have been onboarded, we evaluate their adherence to the Supplier Code of Conduct regularly and encourage them to continue to think and act sustainably wherever possible.

Our KPI is to allocate 70% of our purchase spend to suppliers with average or above-average ESG performance by 2030. We view this as an essential part of our commitment to promoting safe and sustainable practices within our supply chain.

Following the guidance of two industry-leading sustainability rating providers, EcoVadis and CDP, we have defined 'average' as an EcoVadis rating of silver and/or a CDP rating of B-. These baselines allow us to measure progress towards our target and compare our suppliers' sustainability performances.

In 2024, 51% of our total procurement spend was allocated to suppliers with an average or above-average ESG score, down from 64% in 2023 and 61% in 2022.

In 2024, Trivium further established a set of internal targets to monitor the implementation of sustainable practices in our procurement activities. These targets cover topics on supplier ESG rating, annual supplier ESG survey, supplier ESG audits, Supplier Code of Conduct compliance, supplier trainings and conflict minerals reporting. These targets set priorities and will guide our efforts to further advance our sustainable sourcing practices across our supply chain.

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

There are many risks related to suppliers, including their compliance with environmental management, human rights, working conditions, and a variety of laws and regulations. We monitor these risks closely via our internal risk management platforms. We also conduct supplier audits when needed and align them with suppliers. These suppliers are selected based on their ESG performance from the annual ESG questionnaire, EcoVadis rating, and ongoing internal stakeholder feedback. Below we set out the details of how we seek to verify our supply chains, audit suppliers and obtain supplier certifications.

### **Desktop risk assessment and due diligence process**

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.

To focus our efforts where they are likely to be most impactful, we pay particular attention to our top 200 suppliers, who together represent around 83% of our purchase spend. Following our 2024 Supplier ESG questionnaire, we achieved a 65% completion rate among the requested suppliers, covering 88% of our top 200 suppliers' purchased spend. We invite them to respond to an annual questionnaire, addressing a broad range of ESG topics, including environmental management, greenhouse gas emissions and workplace controls. We use the results to create a sustainability scorecard for each supplier, allowing us to monitor their ESG performance over time and keep track of the initiatives they have in place.

The 2024 Supplier ESG questionnaire included questions about DEIB, including diversity metrics and living wage. It also included requests for information about actions on human rights, due diligence progress and human rights risks in suppliers' operations and supply chains.

Among the tinplate and aluminium suppliers who responded, approximately 50% have initiated the human rights due diligence process within their supply chains and operations. This effort provides us with an initial understanding of the key human rights risks in our industry.

Human rights as a social topic is gaining attention due to the upcoming Corporate Sustainability Due Diligence Directive (CSDDD) regulation, which is also triggering more inquiries from Trivium customers on this matter.

The topic of living wage has recently been raised by our customers. We also asked for input

from our suppliers on this topic. Among the steel and aluminium suppliers who responded, around 20% have set a target for living wage, while many are still in the process of conducting living wage benchmark analyses. Positively, over 85% of these suppliers have already implemented actions to promote DEIB within their operations.

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

Based on the outcome of the desktop risk assessment, a supplier may be required to undergo either customized follow-ups such as an on-site assessment conducted by one of our representatives or an ESG audit by a 3rd party. Both the assessment and audit include content related to modern slavery. The focus of these follow-ups and audits is determined by the supplier's ESG performance and their involvement in the EcoVadis assessments.

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. 45% of the steel suppliers and 25% of the aluminium suppliers reported conducting a Sedex Members Ethical Trade Audit (SMETA) or ethical audit in the past two years to demonstrate their commitment to ethical and sustainable business practices.

In 2024, we conducted one onsite ESG audit with a steel supplier. Through focused ESG discussions, we promote the adoption of ESG practices among our suppliers through corrective action plans where needed. We actively encourage our suppliers to participate in EcoVadis assessments to promote greater transparency in the supply chain.

### **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.

### **Remediation**

We have not encountered instances of modern slavery in our operations or supply chain. To the extent that such issues are uncovered in the future, we will consider appropriate remediation.

### **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.

To support our suppliers in enhancing their ESG performance, we conduct annual capacity-building training sessions with our top 200 suppliers. In 2024, the Procurement, Legal, Sustainability teams delivered a training session focused on human rights and modern slavery to approximately 30 of our suppliers.

In addition, we regularly train our employees on a variety of topics, such as ethics and compliance, Speak up!, competition law, fraud, anti-bribery and corruption (ABC) and human rights. These training courses take place in person (in a classroom setting) or online (via webinars) and are reinforced via internal communications. At each training, online or in person, we also outline how employees can report complaints, including details of available reporting channels.

In 2024, Trivium's Director of Sustainability and Director of Risk & Compliance actively participated in the United Nations Global Compact - Business and Human Rights Accelerator Programme to learn and structure even further the company's approach on human rights due diligence.

## 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.

This report is approved by the Board of Directors of Trivium Packaging B.V. pursuant to section 11(4)(b)(ii) of the Canadian Act.

Digitally signed on behalf of Trivium Packaging B.V., by its duly authorized officers and directors on 28 May 2025: Michael Mapes, Chief Executive Officer and Stefan Siebert, Chief Financial Officer.

Signed by:

Michael MAPES

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Signiert von:

Stefan SIEBERT

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