



2021 CONFLICT MINERALS REPORT

Department Name: Legal, Procurement, & Sustainability

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Conflict Minerals Report

At Trivium Packaging, we are committed to the responsible sourcing of the minerals which are needed for the manufacturing of our products.

This Report asserts our commitment to complying with the EU Conflict Minerals Regulation 2017/821, implemented on 1st January 2021 (the “Regulation”) and describes our supply chain due diligence process for conflict minerals. Conflict minerals are defined as columbite-tantalite (coltan), cassiterite, gold, wolframite, or their derivatives, which are limited to tantalum, tin, and tungsten (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.

1. Company Overview and Scope

Trivium Packaging is a global leader in infinitely recyclable metal packaging solutions, for most of the world’s leading food, and consumer brands.

Our steel packaging products are made from tinplate (electrolytic tinplated steel & electrolytic chromium coated steel) which is included in the definition of Conflict Minerals.

Except as described above, we do not use Conflict Minerals in our manufacturing processes.

2. Our Approach to Due Diligence

Tin is one of the minerals which could be linked to armed-conflicts and related human rights abuses, which explains why companies must check that what they buy is sourced responsibly and does not contribute to conflict or other related illegal activities.

Our due diligence program relating to Conflict Minerals is designed accordingly, based on the reporting requirements of the Regulation but also the US Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010, even though Trivium does not fall within the scope of the latter as it is not a company listed on the US Stock Exchange.

For 2020, a reasonable country of origin inquiry (“RCOI”) was conducted in good faith. It is designed to determine whether any of the necessary Conflict Minerals in

our products originated in the Democratic Republic of the Congo or an adjoining country (“Covered Countries”).

The Responsible Minerals Initiative’s (“RMI”) Conflict Minerals Reporting Template (“CMRT”) was used to obtain sourcing information from our direct suppliers of tinplate and tinplate components. Our RCOI included assessing the responses we received from our suppliers and evaluating smelters.

Based on the responses from our tinplate suppliers, the tinplate sourced from them did not contain Conflict Minerals originated from a Covered Country. However, from the responses from our suppliers of tinplate components we have reason to believe that some of the necessary tinplate used in those products, which are incorporated in our final product, may have contained conflict minerals originated from a Covered Country.

3. Risk Mitigation in the Next Reporting Period

When completing the conflict mineral risk assessment, we combined for 2020:

- i. information from multiple open data sources, and
- ii. information provided by suppliers via a mandatory online questionnaire.

Suppliers are reassessed on a rotational basis. For 2020, 80% of our suppliers completed the questionnaire, up from 71% in 2019 and covering over 90% of our purchase spend.

In order to continue improving our approach and mitigating risk arising from Conflict Minerals in the supply chain, we intend to take the following steps:

- Collaborate with tinplate component suppliers to achieve full coverage
- Collaborate with suppliers to raise the awareness on the importance of the topic at hand, and
- Inform new suppliers, if any, early on to ensure awareness.

July 2021

Digitally signed by:

Michael Mapes,

Chief Executive Officer,

Trivium Packaging