

MODERN SLAVERY STATEMENT

ISSUE DATE: MAY 28, 2026

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 2025, as required by section 54(1) of the UK Modern Slavery Act 2015.

We hereby report on the steps we have taken during 2025 to combat modern slavery.

Our organization

Trivium Packaging ('Trivium'), headquartered in Schiphol, the Netherlands, is a leading supplier of innovative, value-added, rigid metal packaging solutions, designed to benefit the products they contain and the people who use them. We operate 57 locations across 19 countries worldwide, employ approximately 7,200+ employees and have a group revenue of about \$3 billion as of December 31, 2025.

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.

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 mainly 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 raw materials e.g. tinplate and aluminium, energy, 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 2025, we launched a refresher training on the Code of Conduct for employees with an email account. The focus of

the e-learning was psychological safety in the workplace for employees. Additionally, it created further awareness on the newly adopted Global Anti-Harassment and Anti-Bullying Policy within Trivium. The completion rate of the elearning was 100%.

In the annual 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.

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. Our efforts to increase awareness are also reflected in the feedback from our annual Organizational Health Index survey where employees were asked "I know how to report a possible concern or violation of the Trivium Code of Conduct". From all respondents, 85% agreed with this statement, demonstrating a widespread awareness of reporting mechanisms across the organization.

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 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.

Across our production facilities, we aim to fully comply with all relevant local employment, environmental and health and safety laws, and we regularly review and update our human resources policies on issues such as parental leave, pension and minimum wage requirements.

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. The Supplier Code of Conduct 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 (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.

The Trivium Procurement Policy was updated in September 2025. This update to the Global Policy reflects our continued commitment to operational excellence, compliance and sustainability across all procurement activities. We introduced a new vendor onboarding

process as part of this update, complete with due diligence checks regarding the vendor's compliance, risks, and sustainability performance and information security. This updated Policy also reinforces the requirement of signing Trivium's Supplier Code of Conduct, Trivium's rights to ESG audits and supplier training requirements.

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

Our target 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 2025, 52% of our total procurement spend was allocated to suppliers with an average or above-average ESG score, up from 49% in 2024 but down from 64% in 2023. To support the achievement of our procurement targets and strengthen our due diligence processes, we participate in EcoVadis as a requesting company, using its assessment framework, including the labor and human rights pillar, to enhance oversight of our supplier base.

In 2025, Trivium continued to monitor a set of internal targets aimed at improving 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 training 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

As part of Trivium's commitment to responsible business practices and in response to evolving customer expectations and regulatory requirements, Trivium further strengthened its human rights due diligence program in 2025. A multifunctional team conducted a comprehensive, risk-based desktop assessment of human rights risks across Trivium's Tier 1 upstream (raw material) and downstream value chain, in line with the OECD Guidelines and the UN Guiding Principles on Business and Human Rights. This assessment resulted in an initial list of potential human rights issues, which Trivium is using to engage with internal and external stakeholders and to identify the most salient risks to Trivium. As a next step, Trivium will expand its supply chain mapping, including the identification of tiers below Tier 1.

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 over 80% of our purchase spend. We survey the top 200 every two years with the most recent assessment completed for the reporting year of 2024. In the year between, we focus on our biggest raw material suppliers. In 2025, we achieved an 83% completion rate among the requested suppliers, which covers 51% of our total purchase spend.

The 2025 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 60% have initiated the human rights due diligence process within their supply chains and operations. This effort signals a growing commitment to identifying and addressing key human rights risks. Additionally, from the same response group of steel and aluminium suppliers, around 10% have set explicit targets for achieving a living wage, demonstrating leadership in advancing fair labor practices. Furthermore, 71% have 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. Of the surveyed aluminium and steel suppliers 26% have conducted either a Sedex Members Ethical Trade Audit (SMETA) or another ethical audit over the past two years.

In 2025, we carried out an onsite ESG audit with an aluminium supplier, mainly focusing on evaluating their environmental management systems, the traceability of raw materials within their operations and compliance with our Supplier Code of Conduct. There were no specific improvement areas identified on sustainability and the focus will be on maintaining high performance.

To further strengthen sustainable procurement, we actively supported and encouraged our suppliers to participate in EcoVadis assessments, enhancing supply chain transparency and facilitating measurable improvements in sustainability practices.

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 has 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 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.

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 2026: Michael Mapes, Chief Executive Officer and Stefan Siebert, Chief Financial Officer.

Signed by:

Michael MLPES

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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.