

Reporting Period: January 1, 2020, through December 31, 2020

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## Introduction

Since 1992 the CANPACK Group has become one of the largest global manufacturers of metal packaging. The CANPACK Group manufactures aluminium beverage packaging, as well as steel cans for the food industry; easy-open ends; aerosol cans; bottle closures; packaging for the chemical and the cosmetic industries; and, glass bottles, as well as services related to the production of packaging.

In line with our three sustainability pillars: care, sustain and recycle, we are committed to procuring ethically and environmentally sustainable raw materials. As such we prohibit the procurement of materials containing minerals which originate from entities which finance conflicts or benefit armed groups specifically in the Democratic Republic of the Congo or adjoining countries. The extraction of these minerals often entails human rights infringements including using forced labour and abuse of women and children. These so-called conflict minerals include tungsten, tantalum, tin and gold and are known as 3TG.

Whilst CANPACK does not directly procure any of these minerals, a nominal amount of tin is used in the manufacturing of cans and metal closures so as to prevent corrosion.

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## Due Diligence Process Design and Company Management Systems

To ensure a more structured approach to the issues surrounding Conflict Minerals, in 2020 the CANPACK Group put in place a Conflict Minerals Policy which is publicly available on our website. The Group's Procurement Office, in cooperation with CANPACK's Group Sustainability Office, is responsible for implementing the policy.

To ensure the tin we use is sourced from conflict-free areas, we follow strict procedures based on applicable national and international guidelines, including "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas" issued by the OECD.

We have implemented the following preventative measures:

- All of our suppliers are required to sign our supplier code of conduct
- We require our suppliers of components, parts or products which contain tin (or any other conflict minerals as may be or become applicable) to obtain it from conflict-free sources
- This policy is available to our suppliers, and we expect them to establish similar guidelines for their own suppliers

- Suppliers are expected to establish a strict due diligence process to ensure compliance throughout their own supply chain.

## Identification and Assessment of Supply Chain Risk

The CANPACK Group requests all its strategic materials suppliers to complete an extensive self-assessment questionnaire which covers, amongst other topics, Conflict Minerals issues. All relevant suppliers must submit a formal statement regarding conflict minerals usage and they are asked to verify this signed statement.

## Response to Supply Chain Risk

Should the CANPACK Group suspect that a supplier is procuring or using tin (or any other conflict minerals as may be applicable) from a source that directly or indirectly finances or benefits armed groups in conflict areas, CANPACK will inform the supplier in writing and give the supplier a reasonable amount of time to correct the non-compliance by submitting certificates of origin to prove the non-use of such mineral(s) from such conflict areas. Should a supplier fail to provide the appropriate evidence, correct use or procurement practices in violation of this policy, or is found to have provided false information, CANPACK reserves the right to terminate its business relationship with the supplier in question. All employees are required to report any suspicions they may have to CANPACK directly or via the speak-up procedure.

## Support for Smelter Due Diligence

As CANPACK does not directly purchase tin, tungsten, tantalum, or gold; and given that its direct suppliers do not smelt or refine these metals at their premises', CANPACK does not conduct on-site audits related to Conflict Minerals. Instead we rely on and monitor audits and information provided to us by our direct suppliers.

## Annual Report on Supply Chain Due Diligence

This is the first CANPACK Group's Conflict Minerals Due Diligence Report. Going forward we have committed ourselves to publishing an annual update on the issue.

Only one aluminium coil supplier and one chemical compound supplier declared they supply CANPACK with materials containing 3TG minerals. All the remaining suppliers reporting the use of 3TG materials were steel suppliers.

45% of our active steel suppliers sent us completed CMRTs. Another 18% of our steel suppliers shared with us their conflict minerals statement. These suppliers cover almost 98% of steel purchased during 2020.

According to received CMRTs and conflict mineral statements none of the steel from these suppliers was sourced from conflict areas (please refer to the list of smelters in Appendix 1 and Appendix 2).

## Steps to Improve Future Due Diligence Measures

For the next reporting period we aim to increase the response rate from our steel suppliers. As a first step to achieving that goal we have conducted a series of individual meetings with our suppliers to further discuss the key points of our sustainability strategy, including responsible sourcing.

Our goal is to have a 100% response rate from our steel suppliers and have 100% 3TG containing steel sourced from conflict free areas.

## Appendix 1 CANPACK Group's suppliers' Smelter List (As of December 2020)

Metal	Official Name	Smelter	Smelter ID	Smelter Country
Tin	Minsur		CID001182	PERU
Tin	PT Timah Tbk Mentok		CID001482	INDONESIA
Tin	OMSA		CID001337	BOLIVIA (PLURINATIONAL STATE OF)
Tin	White Solder Metalurgica		CID002036	BRAZIL
Tin	Empresa Metalúrgica Vinto		CID000438	BOLIVIA (PLURINATIONAL STATE OF)
Tin	Kundur Smelter		CID001477	INDONESIA
Tin	Guangdong Hanhe Non-Ferrous Metal Co., Ltd.		CID003116	CHINA
Tin	Thaisarco		CID001898	THAILAND
Tin	Yunnan Tin Company, Ltd.		CID002180	CHINA
Tin	Malaysia Smelting Corporation (MSC)		CID001105	MALAYSIA
Tin	PT Mitra Stania Prima		CID001453	INDONESIA
Tin	Mineracao Taboca S.A.		CID001173	BRAZIL
Tin	Metallo Belgium N.V.		CID002773	BELGIUM
Tin	China Tin Group Co., Ltd.		CID000315	INDONESIA
Tin	Fenix Metals		CID000468	POLAND

Metal	Official Name	Smelter	Smelter ID	Smelter Country
Tin	China Tin Group Co., Ltd.		CID001070	CHINA
Tin	Mitsubishi Materials Corporation		CID001191	JAPAN
Tin	PT Artha Cipta Langgeng		CID001399	INDONESIA
Tin	PT Babel Inti Perkasa		CID001402	INDONESIA
Tin	PT Bukit Timah		CID001428	INDONESIA
Tin	PT DS Jaya Abadi		CID001434	INDONESIA
Tin	PT Panca Mega Persada		CID001457	INDONESIA
Tin	PT Prima Timah Utama		CID001458	INDONESIA
Tin	PT Refined Bangka Tin		CID001460	INDONESIA
Tin	PT Sariwiguna Binasentosa		CID001463	INDONESIA
Tin	PT Stanindo Inti Perkasa		CID001468	INDONESIA
Tin	PT Tinindo Inter Nusa		CID001490	INDONESIA
Tin	PT ATD Makmur Mandiri Jaya		CID002503	INDONESIA
Tin	PT Inti Stania Prima		CID002530	INDONESIA
Tin	PT Bangka Prima Tin		CID002776	INDONESIA
Tin	PT Sukses Inti Makmur		CID002816	INDONESIA

Metal	Official Name	Smelter	Smelter ID	Smelter Country
Tin	PT Menara Cipta Mulia		CID002835	INDONESIA
Tin	Smelter not listed		n/d	CHINA
Tin	Metalor USA Refining Corporation		CID001157	UNITED STATES OF AMERICA
Gold	Mineracao S.A.	Taboca	CID001173	BRAZIL
Tin	Umicore Business Precious Refining	S.A. Unit Metals	CID001980	BELGIUM
Gold	White Metalurgia Mineracao Ltda.	Solder e	CID002036	BRAZIL
Tin	Xiamen Tungsten (H.C.) Co., Ltd.		CID002320	CHINA
Tungsten	Metallo Belgium N.V.		CID002773	BELGIUM
Tin	Tin Technology & Refining		CID003325	UNITED STATES OF AMERICA



## Appendix 2 Countries of Origin of 3TG (2020)

Country	# of Smelters/Refiners
BELGIUM	3
BOLIVIA (PLURINATIONAL STATE OF)	2
BRAZIL	4
CHINA	5
INDONESIA	19
JAPAN	1
MALAYSIA	1
PERU	1
POLAND	1
THAILAND	1
UNITED STATES OF AMERICA	2