

# Conflict Minerals Due Diligence Report

Reporting Period: January 1, 2023, through December 31, 2023

## 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 that originate from entities that 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.

While CANPACK does not directly procure any of these minerals, a nominal amount of tin is used to manufacture cans and metal closures 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:

- 100% of our suppliers are required to sign our supplier code of conduct.
- We require our suppliers of components, parts, or products that 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 suppliers.
- Suppliers are expected to establish a strict due diligence process to ensure compliance throughout their supply chain.

# **Conflict Minerals Due Diligence Report**

## **Identification and Assessment of Supply Chain Risk**

The CANPACK Group requests all its strategic materials suppliers to complete an extensive self-assessment questionnaire that 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 fourth CANPACK Group's Conflict Minerals Due Diligence Report. Going forward we have committed ourselves to publishing an annual update on the issue.

In 2024, the Sustainability Office performed a Conflict Minerals Risk assessment, covering 100% of CANPACK's aluminium, steel, lacquers, inks and other chemicals suppliers active in 2023, achieving a Response Rate of 68% of targeted suppliers. CANPACK excluded paper and plastic packaging suppliers as no Conflict Minerals (CM) risk was identified in their products in recent years.

Only one aluminium coil supplier and two chemicals suppliers declared that they supply CANPACK with materials containing 3TG minerals. The remaining suppliers reporting the use of 3TG materials were steel suppliers.

100% of suppliers that declared use of Conflict Minerals in their products shared their completed CMRTs for 2023. Suppliers of steel cover 100% of steel purchased during 2023. Based on the received CMRTs and conflict mineral statements, minerals are not being sourced from the Covered Countries (see Appendix 1 for the list of countries).

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## **Steps to Improve Future Due Diligence Measures**

To ensure compliance and uphold responsible sourcing practices, CANPACK will maintain active engagement with suppliers to ensure their awareness and adherence to the Conflict Minerals Policy. This involves requesting detailed information on the use of conflict minerals in their products and obtaining their Conflict Minerals Reporting Template (CMRT) for 2024.

In 2024, CANPACK reassessed the strategic supplier segmentation and adjusted the assessment frequency for steel, inks, and lacquers to an annual basis. For the upcoming reporting period, we aim objectives to enhance the response rate from CANPACK's strategic suppliers, which were in the CANPACK CM Risk Analysis as potentially utilizing 3TG. To reach the goal, we will undertake a series of actions in 2025. This includes distributing the Supplier Engagement Guide, which addresses the Conflict Minerals issue. Additionally, we will hold individual meetings with our strategic suppliers to discuss key aspects of our sustainability strategy, including responsible sourcing.

Our goal is to have a 100% response rate from our aluminium, steel, lacquers, inks and other chemicals suppliers, and have 100% 3TG-containing products sourced from conflict-free areas.

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## Appendix 1 Countries of Origin of 3TG (2023)

Country	Smelters numer
BELGIUM	2
BOLIVIA (PLURINATIONAL STATE OF)	2
BRAZIL	3
CANADA	2
CHINA	7
GERMANY	1
INDONESIA	10
ITALY	1
JAPAN	2
MALAYSIA	1
MEXICO	1
PERU	1
POLAND	1
SINGAPORE	1
SPAIN	1
SWITZERLAND	3
THAILAND	1
UNITED STATES OF AMERICA	5