

# **CANPACK Group Conflict Minerals Policy**

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.

## **Our commitment**

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, it is aware that some of the steel used to manufacture cans contains tin for corrosion prevention. To ensure that 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 therefore 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; and
- Suppliers are expected to establish a strict due diligence process to ensure compliance throughout their own supply chain.

## **Scope of Application**

This Policy applies to all suppliers working with or for the CANPACK Group.

## **Review Mechanism**

This Policy is reviewed annually and will be amended if necessary.

## **Roles and Responsibilities**

All suppliers using 3TG in the products delivered to CANPACK are required to provide to CANPACK completed Conflict Minerals Reporting Template (CMRT) available [HERE](#). Global Procurement Director is responsible for making this policy available to all suppliers and to provide the necessary training for CANPACK Group buyers on actions described in this policy.

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## Sanctions

Should CANPACK suspect that a supplier is procuring or using tin (or any other conflict minerals as may be or become 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 according to CANPACK directly or via the speak-up procedure.

CANPACK provides an open and accessible speak-up and complaints mechanism, which also serves as the grievance mechanism for raising concerns related to human rights, environmental impacts, and other sustainability-related issues.

Concerns or suspected violations may be reported at any time through the CANPACK whistleblowing platform available at:

<https://www.integritycounts.ca/org/giorgiglobalholdings>

All reports are handled with strict confidentiality. CANPACK ensures that no reporter or whistleblower faces retaliation, discrimination, or any other negative consequences for raising a concern in good faith.

A handwritten signature in blue ink, appearing to read "Marius Croitoru".

**Marius Croitoru**  
CEO CANPACK Group