

Group Legal & Compliance

# Ethics & Compliance - Third Party Complaints Procedure

## 1 Introduction

Ardagh is committed to operating an ethical and honest way and to comply with all applicable laws and regulations. As part of this commitment, Ardagh aims to conduct its activities with the highest standards of integrity in all dealings with employees and third parties, including customers, suppliers, public authorities, shareholders, bondholders, financial institutions and the general public. Ardagh does not tolerate any violations of laws and regulations, or of its Code of Conduct.

Ardagh encourages its employees and third parties to speak up if they suspect or become aware of a violation of laws, or a violation of Ardagh's Code of Conduct in Ardagh's business or in its supply chain.

Ardagh has several avenues through which violations or concerns can be raised in a confidential manner and with the reassurance that reporters will be protected from retaliation or discrimination.

This procedure sets out how external third parties can report violations or concerns with Ardagh, and Ardagh's process for investigating such reports.

## 2 What can I raise a concern about?

Third parties can report any ethics or compliance concerns which relate to Ardagh or its supply chain. This may include any suspicions or concerns about Ardagh or any party within its supply chain (e.g., direct or indirect suppliers) that are related to:

- violations of laws or regulations
- human rights
- health and safety
- environment-related violations; or
- violations of Ardagh's Code of Conduct.

Concerns related to commercial relationships (such as ongoing sales or purchase/supply relationships, delivery issues, product specifications) should be raised directly with contacts within Ardagh.

## 3 How can I report a concern?

Reports may be made via the contact us page on [Ardagh's website](#). Specifically, reporters should select "Ethics and Compliance" as the nature of the query. Alternatively, reports can be made by emailing Ardagh's Group Legal & Compliance department at [compliance@ardaghgroup.com](mailto:compliance@ardaghgroup.com).

Ardagh complies with all applicable laws, including in relation to whistleblowing and data protection, and will ensure that reports are handled in a confidential and effective manner. Subject to national laws, concerns can be raised anonymously, although doing so will restrict Ardagh's ability to communicate with reporters.

## 4 What happens once I report my concern?

All ethics or compliance reports will be dealt with by an independent and impartial member of Ardagh and in a professional and timely manner. Ardagh will ensure protection against any form of retaliation to all parties submitting a report in good faith. Good faith means telling the truth as the reporter has good reasons to believe it.

### Investigation Process

On receiving reports, Ardagh will respond within seven calendar days to acknowledge receipt of the report and to confirm that it is being investigated. A member of Ardagh's Group Legal & Compliance team may contact you via email or telephone you if you have provided contact details. Ardagh will discuss the facts of the concern with you and obtain additional details, as necessary.

Ardagh takes all reports very seriously and will endeavour to complete the investigation and provide an outcome or resolution without undue delay. Investigations may take longer where there are complexities, difficulties obtaining information from the reporter or other special circumstances.

In some instances, our investigation or findings may be protected by legal privilege. We therefore may not always be able to provide you with details of the investigation undertaken or confidential documents connected with the investigation.

## 5 Where can I obtain further information or ask questions?

If you would like further information or have any questions about Ardagh's Ethics and Compliance - Third Party Complaints Procedure, you may contact Ardagh's Group Legal & Compliance department at [compliance@ardaghgroup.com](mailto:compliance@ardaghgroup.com).

This procedure was issued on December 4, 2023. We will review this procedure from time to time and at least on an annual basis and may change or update it at any time.