

MAUSER Packaging Solutions

Conflict Minerals Policy

This policy applies to Mauser Packaging Solutions, a collection of legal entities that are parent companies, subsidiaries, and affiliates of each other and operate collectively under the common umbrella “Mauser Packaging Solutions” (collectively, the “Company” or “Mauser”)

Policy Governance: General Counsel
Policy Implementation: Global Supply Chain
Effective Date: September 27, 2023
Revised Date: September 1, 2024
Next Review: 2025 CY

Introduction

Mauser Packaging Solutions (the “Company” or “Mauser”) is dedicated operating in compliance with all applicable laws and ensuring that the materials we use in manufacturing our products are sourced in a responsible manner. This includes compliance with laws¹, which aim to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries (“Conflict Minerals”). The minerals impacted include tin, tantalum, tungsten, their ores and mineral derivatives, and gold (“3TG Minerals”). Mauser is committed to working with our customers and suppliers to avoid the use of Conflict Minerals in the manufacture of our products.

Due Diligence

We carry out reasonable supply chain due diligence that aligns in all material respects with the general principles set forth in the Organization for Economic Co-operation and Development’s Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. We also rely on information from the Responsible Minerals Assurance Process (“RMAP”), a voluntary initiative managed by the Responsible Minerals Initiative (the “RMI”), in which an independent third party audits the procurement activities of a smelter or refiner to determine, with reasonable confidence, that the minerals it processes originated from conflict-free sources.

The Company has determined that most of its small metal containers and related container components (e.g., general line cans and related components) contain tin. Each relevant first-tier supplier to the Company is therefore required to provide a completed Conflict Minerals Reporting Template (the “CMRT”) made available by the RMI, on an annual basis, evidencing such supplier’s commitment to the foregoing and documenting countries of origin for the tin that it purchases. Because the Company is typically several tiers removed from the smelter or refiner and mineral origin of products in its supply chain, the Company relies principally on its direct suppliers to provide it with information regarding the source and chain of custody of 3TG Minerals in its supply chain. Upon receipt of completed CMRTs from its suppliers, the Company assesses the due diligence efforts of any identified smelter or refiner by examining the information provided in the CMRT to determine if the smelter or refiner has been validated under the RMI’s RMAP as “Conformant.” The RMAP provides information regarding those smelters or refiners that, following an independent third-party audit, have been found to be compliant with the RMAP’s assessment protocols to assure sourcing of only conflict-free materials. Where information from the RMI is not available, the Company conducts its own diligence, which may include contacting its first-tier suppliers for additional information, conducting internet

¹ See e.g., Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.



research, and analyzing the potential country of origin of 3TG Minerals based on the smelter's location.

Our suppliers are expected to comply with all applicable laws and regulations relating to Conflict Minerals, as outlined in the Mauser Packaging Solutions Supplier Code of Conduct. If the Company becomes aware of a suppliers' non-compliance with this policy, the Company will take appropriate action, which may include discontinuing the business relationship with the supplier.