

CONSOLIDATED BOTTLE CORPORATION ANNUAL REPORT

Introduction

Consolidated Bottle Corporation (“CBC” or the “Company”) is committed to preventing the occurrence of forced labour and child labour in our operations and supply chains. We do not tolerate child labour, forced labour, or any other form of slavery and we expect that our suppliers share our commitment to ethical and responsible business practices and support our values.

This report (the “Report”) has been prepared pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”) and outlines the actions we have taken during the year ended December 31, 2023 to prevent and reduce the risk of forced labour or child labour occurring in our business.

The use of the words “we,” “us,” and “our” refers to CBC.

Our Structure and Business

CBC specializes in supplying a range of glass, metal, and plastic containers and closures for customers in various end markets, along with providing technical and logistical support. CBC operates two locations in Canada.

Our Supply Chains

We purchase glass, plastic, corrugate, and certain metal rigid packaging products and related materials. Our products are sourced from a global supply chain and, while business relationships with our supply base are long-term and well-established, we recognize that this introduces a risk of breaches to human rights that are not within the control of the Company and that we must therefore take steps to identify and minimize this risk. The Company also accepts that we cannot do this alone and relies on the transparency and cooperation of suppliers to identify risks within their own supply bases.

Our Policies and Due Diligence Processes

The Company operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent Modern Slavery in its operations:

- Whistleblowing policy – The Company encourages all its workers, customers, suppliers, and other business partners to report any concerns related to the direct activities or supply chains of the Company. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The Company’s whistleblowing procedure is designed to make it easy for workers to make disclosures without fear of retaliation and provides the opportunity to report anonymously.
- Employee Global Code of Conduct – The Company’s Global Code of Conduct clarifies to employees the actions and behavior expected of them when representing the Company. The Company strives to maintain the highest standards of employee conduct and ethical behavior when operating both domestically and abroad to manage its supply.
- Supplier Code of Conduct – The Company is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the required standards and improve their own and their supply chains’ working conditions. Any violations recognized within our supply chain through our whistleblowing policy or supplier audits and assessments shall be acted upon immediately with improvement measures and follow-up activities. CBC may also terminate its

business relationship with the supplier if it determines that a supplier or any of its subcontractors has violated the Company's Supplier Code of Conduct or if the supplier has continued violations without improvement.

- General Recruitment – We ensure that all our staff are legally able to work in Canada and provide information to all new recruits on their statutory rights, including sick pay, holiday pay, and any other benefits they may be entitled to. Further, the Company uses only specified, reputable employment agencies to source temporary labour.

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers.

The Company's due diligence and reviews include:

- conducting supplier audits or assessments prior to onboarding a new supplier;
- conducting regular follow-up audits for each supplier;
- providing a copy of our Supplier Code of Conduct to all current and new suppliers and asking suppliers to agree to comply with its terms;
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our Supplier Code of Conduct, including the termination of the business relationship;
- ensuring that staff involved in supplier audits, procurement, recruitment, and deployment of workers are aware of the risks of modern slavery and ethical business practices; and
- understanding that the risks of modern slavery are growing, and we will continue to monitor our approach to mitigating this risk in the year ahead.

Risks of Forced Labour and Child Labour in our Business and Supply Chains

CBC sources from a global supply base with varying degrees of risk associated with the differing countries. Where we consider the countries to be of a higher risk, we manage risk appropriately to approve suppliers on a case-by-case basis, after conducting due diligence specified below.

Measures Taken to Remediate Forced or Child Labour and Loss of Income to Vulnerable Families

We have not identified any child/forced labour within our supply chain and have therefore not taken remediation measures.

Employee Training

All employees of CBC review the Company's Global Code of Conduct upon hire and re-certify their commitment to upholding the Global Code of Conduct on an annual basis. The Company conducts annual anti-corruption and anti-bribery training for all employees and periodically conducts targeted risk training as needed to combat other potential risks, which may include preventing forced or child labour.

Measuring Our Effectiveness

CBC and its parent company, Berlin Packaging L.L.C., are committed to responsible supply chains, and in 2024, will complete the process to become a member of the Supplier Ethical Data Exchange (Sedex). As a member of Sedex, CBC will be able to utilize Sedex's supplier scorecards to gain an understanding of where the highest risks to human rights exist within its suppliers. The Company also plans to revisit its criteria for its own internal supplier scorecards to consider placing additional emphasis on corporate social responsibility.

CBC and its parent company, Berlin Packaging L.L.C. conduct quarterly risk assessment meetings with members of its executive team to consider and evaluate the Company's effectiveness in mitigating compliance risk, including preventing human rights abuses.

Board Approval

The Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of Consolidated Bottle Corporation.

In my capacity as a Director of Consolidated Bottle Corporation, and not in my personal capacity, I make this attestation in accordance with the requirements of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Matthew Colman

Director, Global Chief Legal Officer & Executive Vice President of Corporate Development

Date: 05/10/2024

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I have authority to bind Consolidated Bottle Corporation.