



Fighting Against Forced Labour and Child Labour in Supply Chains Act

2023 Report

Introduction

This joint report is published in connection with the reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "**Act**") on behalf of Crown Metal Packaging Canada LP ("**CMPC**") and Signode Canada ULC ("**Signode**", together with CMPC, the "**Crown Entities**"). Both of the Crown Entities are subsidiaries of Crown Holdings, Inc. ("**Crown Holdings**"). This report covers the 2023 fiscal year, with the fiscal year ending December 31, 2023.

The Crown Entities are subject to the reporting requirements of the Act because they each have a place of business in Canada and assets and revenue in Canada that exceed the threshold tests set out in the Act. Additionally, CMPC also exceeds the employment threshold as it has over 250 employees in Canada. The Crown Entities are in the business of producing, selling and distributing goods both inside and outside of Canada, as well as importing goods produced outside of Canada, as described in more detail below.

The Crown Entities are committed to acting with integrity and ethically in all of their business transactions. They are committed to identifying and reducing the risk of forced labour or child labour occurring within their supply chain networks. The Crown Entities expect suppliers and business partners to uphold these same principles within their operations and to comply with all applicable laws, including human rights and employment standards laws.

Structure, activities and supply chain

Crown Holdings, through its subsidiaries, (collectively, the "**Crown Group**"), is a leading global supplier of rigid packaging products to consumer marketing companies, as well as transit and protective packaging products, equipment and services to a broad range of end markets.

CMPC is a global leader in the manufacture and sale of packaging products for consumer goods. Specifically, CMPC manufactures and/or sells aluminum metal can bodies and ends for the food and beverage industries. CMPC is a limited partnership, which is registered and has its headquarters in Ontario, Canada. At the time of this report, CMPC has 281 employees across Canada. Rolled aluminum can sheet, varnishes and inks, sourced primarily from North America, most of which are obtained from the United States, constitute almost all of the raw materials for the metal packaging products made and sold by CMPC. CMPC primarily sources these raw materials directly from the manufacturers. CMPC also imports finished can bodies and ends from CMPC's U.S. affiliate for resale in Canada.

Signode is a distributor of Signode Industrial Group LLC ("**Signode Group**") products. Signode produces edge protectors and special printing machines, and services Signode Group packaging machines. Signode is an unlimited liability corporation, with 68 employees in Canada at the time of this report, whose registered office is located in Nova Scotia, and whose headquarters and primary place of business is in Ontario. Signode procures goods directly from manufacturers which are primarily located in Canada and the U.S. Less than 1% of the goods procured by Signode are sourced from Taiwan. Signode's service suppliers are all located in North America, the majority of which are located in Canada.

Policies, Controls and Due Diligence Processes

The Crown Group has multiple policies in place that relate to forced labour and child labour. The Crown Group is committed to acting ethically and responsibly in all facets of their operations, and has adopted several policies to achieve this objective:

- The **Code of Business Conduct and Ethics**¹ reflects the group's commitment to acting ethically and with integrity in all aspects of the business;

¹ Signode Group has a parallel policy (Statement of Principles of Conduct) which aligns with the Crown Group's Code of Business Conduct and Ethics.

- The **Human Rights Policy**² condemns all forms of forced compulsory labour, exploitative child labour, and participation in human trafficking by any person or organization;
- Through the Crown Group's **Supplier Code of Conduct**, suppliers are expected to support and respect the protection of human rights and ensure they are not complicit in human rights abuses;
- As a signatory to the **United Nations Global Compact ("UNGC")** since 2022, the Crown Group supports the principles of the UNGC, including those focused on the protection of human rights, the elimination of all forms of forced and compulsory labour, and the effective abolition of child labour; and
- The Crown Group's **Whistleblower Policy**³ sets forth the resources available to employees and other stakeholders to raise any concerns regarding any potential violations of the Crown Group's Code of Business Conduct and Ethics or any other applicable policy or legal requirement.

The Crown Group's Code of Business Conduct and Ethics forms the centerpiece of its framework for ethical business conduct. Other ethics-related policies, such as the Supplier Code of Conduct, Human Rights Policy and the Conflict Minerals Policy, are available on Crown Holdings' website, with parallel policies available on the Signode Group's website. In each of its policies, the Crown Group references the requirement to comply with all applicable laws and regulations.

The Crown Group's Human Rights Policy is informed by the UN Universal Declaration of Human Rights, the Fundamental Principles and Rights at Work from International Labour Organization (ILO), the United Nations Global Compact Guiding Principles and the national legislation in each country in which we operate.

The policy commitments apply to the organization's activities both in its own operations and also extend to the conduct of its suppliers via the Supplier Code of Conduct. The Crown Group expects certain third parties, including suppliers, to abide by the principles of the Code of Business Conduct and Ethics in the manner set forth in the Crown Group's Supplier Code of Conduct, which is available on Crown Holdings' website at www.crowncork.com/investors/policies/supplier-code-conduct in English and 20 other languages.⁴ Accordingly, contracts with direct suppliers to the Crown Group typically require the suppliers to comply with all applicable laws, which include the laws regarding forced labour or child labour of the country or countries in which they are doing business.

The Crown Group does not have a group-wide audit process to evaluate supplier compliance with its standards for forced labour or child labour in our supply chains, however, in purchase agreements, the Crown Group often reserves the right to conduct audits of their vendors' compliance with laws. Audits may be conducted by independent parties or by the Crown Group's personnel and may or may not be unannounced, depending on the terms of the contract.

The policy commitments, as set forth above, are communicated to workers via in-person and virtual training such as the annual virtual Code of Business and Ethics Conduct training, to the Crown Group's business partners via contractual agreements, and made publicly available to other relevant parties.

In the event of an ethical or compliance concern, employees and other stakeholders are encouraged to report any such concerns, and have multiple mediums to do so, anonymously, if they prefer, and as permitted by law. Concerns may be reported through the Crown Group's ethics hotlines which can be

² The Human Rights Policy applies to the Crown Group's metal packaging operations (including CMPC) and a parallel policy covers Signode Group and its subsidiaries (including Signode).

³ Concerns related to Signode may also be reported through Signode's separate Confidential Hotline at www.sighelpline.ethicspoint.com.

⁴ Signode Group's Supplier Code of Conduct is available on its website at <https://www.signode.com/en-US/Suppliers/Supplier-Code-of-Conduct> in English and 22 other languages.

accessed around the world at any time in multiple languages. Concerns can also be raised with supervisors, human resources staff, internal audit staff or legal department staff at any time.

Training to Employees

The Crown Group's Code of Business Conduct and Ethics applies to all Directors and employees. The Code of Business Conduct and Ethics is available on Crown Holdings' website at www.crowncork.com/investors/policies/code-business-conduct-and-ethics, and is available in English and 16 other languages, including French. The Crown Group provides virtual training that focuses on implementing the commitments of responsible business conduct to all employees as appropriate to their business functions. In-person training is deployed to a portion of the Crown Group's locations every year and includes both salaried and hourly personnel.⁵ Qualified management personnel, including all employees with company email addresses, are required to annually participate in Crown's Business Conduct and Ethics training which includes certification of the employee's compliance with the Crown Group's standards of business conduct and disclosure of knowledge of any potential violations of such standards.

In addition, the Crown Group launched a comprehensive Human Rights training course for Crown Group employees in conjunction with Human Rights Day. The course is designed to provide an understanding of Human Rights and raise awareness of the Crown Group's dedication to fostering a global culture that respects the rights of every individual, as set forth in the Crown Group's Human Rights Policy. The course was first rolled out to the Crown Group's Europe, Middle East and Africa locations in December 2023, and was later expanded to the Crown Group's Americas and Asia Pacific locations with the goal of all employees worldwide deeply understanding the organization's Human Rights Policy and utilizing its framework to promote ethical, inclusive leadership and welcoming workplace conditions for everyone. The course will be deployed to Signode locations later in 2024.

Assessing the risk of forced labour or child labour in the supply chain

Considering the nature of the business operations of CMPC and Signode, the Crown Entities have determined that there is minimal risk of instances of forced labour or child labour within the supply chains subject to reporting under the Act. The Crown Entities predominantly source their raw materials directly from manufacturers located in Canada and the United States, including their own affiliates. These manufacturers are global multi-national organizations that are often subject to the same laws as the Crown Group, including human rights and employment standards laws.

Notwithstanding the fact that the Crown Entities have determined that the risk of forced labour or child labour in their supply chains is low, the Crown Entities will begin to investigate in greater detail the supply chains subject to reporting under the Act to identify any gaps in the assessment of the risk.

Remediation Measures taken in 2023

There has been no forced labour and child labour identified throughout the supply chain, as such the Crown Entities have not taken any measures to remediate the loss for those affected. Additionally, no individuals or families affected by forced labour or child labour have been identified in the supply chain for remediation measures to be implemented.

⁵ Signode Group operates a separate but parallel program that is aligned with the Crown Group's policy. All Signode Group employees are required to accept Signode's Principles of Conduct as a condition of employment. Signode Group provides virtual training to all employees with company email addresses and requires updated certification to assure continuing education and compliance on these issues.

Steps taken in 2023 to prevent and reduce the risk of forced labour and child labour

In 2023, the Crown Entities took the following steps to prevent and reduce the risk of forced labour or child labour in our supply chains subject to reporting under the Act:

- began developing and implementing an action plan for addressing the risk of forced labour and/or child labour;
- addressing practices within the Crown Entities' activities and supply chains subject to reporting under the Act that increase the risk of forced labour and/or child labour;
- developing and implementing due diligence policies and processes for identifying, addressing and prohibiting the use of forced labour and/or child labour in our supply chains subject to reporting under the Act;
- requiring suppliers to have in place policies and procedures for identifying and prohibiting the use of forced labour and/or child labour in their activities and supply chains subject to reporting under the Act;
- through the Crown Group's Supplier Code of Conduct and contractual agreements, continued to expect its suppliers to support and respect the protection of human rights and ensure they are not complicit in human rights abuses;
- developing and implementing anti-forced labour and/or –child labour standards, codes of conduct and/or compliance checklists;
- monitoring suppliers; and
- developing and implementing grievance mechanisms.

Assessing the effectiveness

As of the date of this report, the Crown Entities do not have policies and procedures in place to assess its effectiveness in ensuring that forced labour or child labour are not being used in its activities and the supply chains subject to reporting under the Act.

Our consultation and governance process

In preparing this report, each of the Crown Entities consulted with key areas of the organization to prepare this report, including Procurement, Human Resources, the Legal Department and our external legal counsel. These teams operate across our enterprise, including across the Crown Entities to which this report applies. This consultation process has supported the enterprise-wide approach to forced labour and child labour which include forced labour and child labour.

Conclusion

Each of the Crown Entities remains committed to preventing forced labour and child labour from taking place in their businesses and in their supply chains. They will continue to review the policies, procedures and practices periodically to determine any enhancements that may be made to help prevent forced labour and child labour and any other forms of human rights abuse.

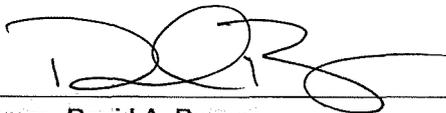
Approval and Attestation

This report was approved pursuant to section 11(4)(b)(i), by the board of directors of the general partner of Crown Metal Packaging Canada LP and the board of directors of Signode Canada ULC on May 30, 2024.

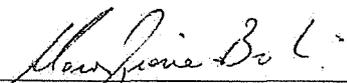
In accordance with the requirements of the Act, and in particular section 11 thereof, we attest that we have reviewed the information contained in the report for the entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report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

Crown Metal Packaging Canada LP

By: Crown Metal Packaging Canada Inc., its
General Partner

Per: 
Name: David A. Beaver
Title: Vice President
Date: May 30, 2024

Signode Canada ULC

Per: 
Name: Marcos Giavina Bianchi
Title: Director
Date: May 30, 2024