



GRI STANDARD DISCLOSURES

PROFILE	3
ECONOMIC.....	20
ENVIRONMENTAL.....	24
LABOR PRACTICES AND DECENT WORK.....	31
HUMAN RIGHTS.....	42
SOCIETY.....	46
PRODUCT RESPONSIBILITY	50

1



This GRI Content Index includes the standard disclosures that Ball reports on, which were selected from the G3.1 Reporting Framework issued by the Global Reporting Initiative (GRI). Ball is currently reporting on 75 out of 84 indicators, which corresponds to 89 percent (95 percent of all core indicators, 79 percent of all additional indicators). Because we do not respond to all indicators, we are applying the GRI Reporting Framework at Application Level B, the second best category for companies following the GRI Reporting Framework. For more details on the GRI Application Level System, please visit www.globalreporting.org.

We significantly improved our data collection process since we published our first sustainability report in 2008. We continuously improve the data collection process, i.e. we aim at maximizing automated data uploads to avoid failures that can happen when data is entered manually. Further, we identified some minor data inconsistencies for data that was previously reported. Where possible, we corrected these inconsistencies and marked those corrections with an “**”. In the few cases where we were unable to adjust data, we do not provide the data and marked fields with a “***”. As we continue to develop and refine our data collection process, it is possible that we could discover additional inconsistencies. If so, Ball will disclose them, and where possible, correct or adjust them, in future reporting.

Unless otherwise stated, we are reporting information globally from operations where we have operational control, including joint ventures where we are the majority owner. For economic, social, energy and water data, we also include our main administrative offices in the U.S. and in Germany. We do not cover any joint ventures in social data.

Acquisitions are included beginning the month after the acquisition was completed. New Ball operations whose data appears for the first time in this report include our aluminum slug manufacturing operations in North America and Europe, our extruded aluminum packaging business in Europe and an acquired metal beverage plant in China. Environmental information from the Latapack-Ball joint venture in Brazil is also included for the first time. Due to the various changes in our businesses and product mix in 2010 and 2011, we redefined how we report [normalized](#) environmental data. This allows for a more meaningful comparison of our performance over time.

Throughout this GRI Content Index, we differentiate between core indicators and additional indicators by using italics for the indicator names of additional indicators.

Additional information on Ball Corporation can be found at www.ball.com.

This version of our 2010/2011 GRI Content Index was published on 23 May 2012.



PROFILE

Strategy and Analysis

1.1 Statement from the most senior decision maker in the organization about the relevance of sustainability to the organization and its strategy.

Please see page 1 in our 2010/2011 Sustainability Report.

3

1.2 Description of key impacts, risks and opportunities.

Ball’s key impacts on sustainability and effects on stakeholders:

	Associated Challenges	Associated Opportunities
Innovation	<ul style="list-style-type: none"> Further lightweighting our containers, which can be difficult because we are already at or near optimum limit 	<ul style="list-style-type: none"> Save material costs Meet the needs of our customers and consumers Lower carbon footprint of our products Improve image and reputation
Operations	<ul style="list-style-type: none"> Increasing costs for energy, water or input materials Several efficiency opportunities require significant capital investment Reducing water usage in can-manufacturing can negatively affect product quality and spoilage Getting all employees involved in maximizing value of businesses 	<ul style="list-style-type: none"> Reduce costs Reduce greenhouse gas emissions Reduce dependence on energy and water in manufacturing process
Talent management	<ul style="list-style-type: none"> Attracting the best talent Creating a talent-first organization 	<ul style="list-style-type: none"> Create long-term growth opportunities
Recycling	<ul style="list-style-type: none"> Increasing recycling rates in countries where rates do not meet expectations is complex and requires funding 	<ul style="list-style-type: none"> Lower carbon footprint of our products Improve image and reputation
Supply chain	<ul style="list-style-type: none"> Influencing suppliers’ sustainability management and performance (compared to our major suppliers, Ball is relatively small) Additional administrative and reporting burdens because of regulations 	<ul style="list-style-type: none"> Save costs Protect license to operate Develop innovations Lower carbon footprint of our products Improve image and reputation
Community	<ul style="list-style-type: none"> Measuring our impact on communities 	<ul style="list-style-type: none"> Being recognized as a good corporate citizen Improve image and reputation



Impact of sustainability trends, risks, and opportunities on Ball's long-term prospects and financial performance:

	Associated Challenges	Associated Opportunities
Climate change	<ul style="list-style-type: none"> ▪ Increasing energy costs ▪ Additional administrative and reporting burdens because of regulations 	<ul style="list-style-type: none"> ▪ Awareness that recycling metals reduces greenhouse gas emissions, leading to higher recycling rates ▪ Improving energy efficiency, leading to reduced costs
Resource scarcity	<ul style="list-style-type: none"> ▪ Certain products we use in our manufacturing processes could become more precious and therefore more expensive 	<ul style="list-style-type: none"> ▪ Awareness that aluminum and iron are the third and fourth most abundant elements on Earth could lead to competitive advantage against other substrates
Water scarcity	<ul style="list-style-type: none"> ▪ Ensuring business continuity at Ball, our suppliers and our customers 	<ul style="list-style-type: none"> ▪ Save costs ▪ Reduce dependence on water
Demographic change	<ul style="list-style-type: none"> ▪ Finding qualified and diverse applicants for new/existing positions ▪ Decreasing qualification of employees 	<ul style="list-style-type: none"> ▪ Maintain high level of expertise of employees ▪ Increase diversity of workforce ▪ Increase dialog between different cultures and generations
Packaging in the sustainability agenda	<ul style="list-style-type: none"> ▪ Changing retailer and consumer preferences in packaging types ▪ Losing market share 	<ul style="list-style-type: none"> ▪ Highlight environmental benefits of our packages (e.g. weight/product ratio, recyclability)
Discussion around product carbon footprints	<ul style="list-style-type: none"> ▪ Misperceptions of external groups such as government officials, retailers and consumers 	<ul style="list-style-type: none"> ▪ Highlight environmental benefits of our packages ▪ Improve collection and recycling (lower carbon emissions throughout the life cycle)
Sustainability related legislation	<ul style="list-style-type: none"> ▪ Enacting unfavorable packaging laws in our markets that could have an adverse impact on Ball ▪ Losing market share 	<ul style="list-style-type: none"> ▪ Influence sound packaging laws based on science-based facts ▪ Increase market share

Organizational Profile

2.1 Name of the organization.

Ball Corporation

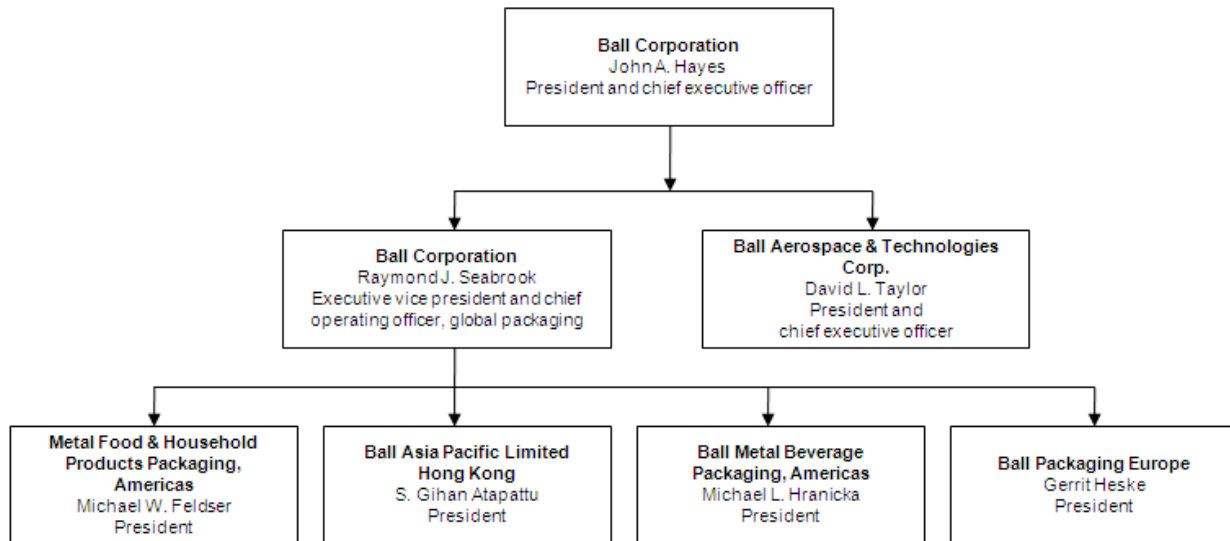
2.2 Primary brands, products and/or other services.

Ball Corporation's largest product line is aluminum and steel beverage cans. Ball also manufactures steel food cans, steel and aluminum aerosol cans and aluminum slugs, steel paint cans and decorative metal tins. Ball Aerospace & Technologies Corp. is a leader in the design, development and manufacture of innovative aerospace systems and produces spacecraft, instruments and sensors, radio frequency and microwave technologies, data exploitation solutions and a variety of advanced aerospace technologies and products.

For more on our products please go to www.ball.com.



2.3 Operational structure of the organization, including main divisions, operating companies, subsidiaries and joint ventures.



Ball Corporation participates in joint ventures in the United States, Brazil, China and France.

- Through Rocky Mountain Metal Container, LLC, a 50/50 joint venture, Ball and MillerCoors Brewing Company operate beverage can and end manufacturing facilities in Golden, Colorado.
- We also own approximately 60 percent of a joint venture in Brazil, Latapack-Ball Embalagens Ltda., which manufactures aluminum cans and ends.
- In France, we own 51 percent of a joint venture aluminum slug plant in Beaurepaire, France, which Ball acquired as part of the Aerocan S.A.S. acquisition in January 2011.

Information on our corporate governance is available [online](#).

2.4 Location of organization's headquarters.

Ball Corporation's headquarters is located in Broomfield, Colorado, USA.

Additional information about our other locations is available [online](#).



2.5 Number of countries where the organization operates and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.

At the end of 2011, Ball had manufacturing operations in 12 countries: the United States, Canada, Czech Republic, Germany, the United Kingdom, France, The Netherlands, Poland, Serbia, Brazil, Argentina and China. Ball reports on all of its operations where we hold a majority of the ownership plus the operations where we hold operational control.

6

2.6 Nature of ownership and legal form.

Ball Corporation is a public company incorporated in the state of Indiana in the United States. Ball Corporation stock is listed on the New York Stock Exchange and uses the ticker symbol BLL. More than 81 percent of Ball Corporation's stock is held by institutional investors. Individual shareholders own about 10 percent. Almost all of the remaining stock is owned by Ball directors and employees, mostly through Ball compensation and benefit plans.

Additional information is available [online](#).

2.7 Markets served (including geographic breakdown, sectors served and types of customers/beneficiaries).

Product	Geographic Breakdown	Typical Sectors Served
Metal beverage packaging	North America, South America, Europe, Asia	Beer, soft drinks, energy drinks, juice
Metal food packaging	North America	Vegetables, fruits, soups, fish, pet food
Aerosol & specialty packaging	North America, South America, Europe	Food sprays, paint, personal-care products, pharmaceuticals
Aluminum slugs	North America, Europe	Producers of extruded aluminum packaging for personal care and beverages
HDPE containers	Asia	Motor oil, paint
Ball Aerospace & Technologies Corp.	North America	U.S. Department of Defense, NASA, National Oceanic and Atmospheric Administration, commercial imagery providers



2.8 Scale of the reporting organization, including: number of employees; number of operations; net sales/revenues; total capitalization in terms of debt & equity and quantity of products/services provided.

	2009	2010	2011
Employees ⁽¹⁾	14,000	13,600	14,300

	2009	2010	2011
Net Sales (million \$)	6,710	7,630	8,631

Number of Products Produced ⁽¹⁾	2009	2010	2011
Metal beverage packaging	52 billion	59 billion	65 billion
Metal food & aerosol packaging	5 billion	5 billion	5 billion
Plastic containers ⁽²⁾	11 billion	6 billion	40 million
Slugs ⁽³⁾	-	670 million	3 billion

⁽¹⁾ Numbers are approximate

⁽²⁾ Ball's North American plastic division was sold at the end of July 2010

⁽³⁾ Two North American and one European slug plant acquired in July 2010 and January 2011, respectively

2.9 Significant changes during the reporting period regarding size, structure or ownership, including the location of, or changes in operations, including facility openings, closings, and expansions.

Change	2009	2010	2011
Acquisition	<ul style="list-style-type: none"> ▪ Gainesville, FL ▪ Rome, GA ▪ Fort Atkinson, WI ▪ Columbus, OH (all USA) 	<ul style="list-style-type: none"> ▪ Foshan (China) ▪ Verona, VA (USA) ▪ Sherbrooke, Quebec (Canada) ▪ Salvador (Brazil) ▪ Jacarai (Brazil) ▪ Tres Rios (Brazil) 	<ul style="list-style-type: none"> ▪ Velim (Czech Republic) ▪ Devizes (UK) ▪ Bellegarde (France) ▪ Beaurepaire (France) ▪ Qingdao (China)
Plant closing	<ul style="list-style-type: none"> ▪ Baldwinsville, NY ▪ Kansas City, MO (all USA) 		<ul style="list-style-type: none"> ▪ Torrance, CA (USA) ▪ Richmond, BC (Canada)
Plant sale	<ul style="list-style-type: none"> ▪ Atlanta, GA ▪ Watertown, WI (all USA) 	<ul style="list-style-type: none"> ▪ Ames, IA ▪ Chino, CA ▪ Bellevue, OH ▪ Batavia, IL ▪ Delran, NJ (all USA) 	



2.10 Awards received in the reporting period.

Ball Corporation and its facilities worldwide are often recognized for outstanding performance, quality, innovation, environmental management and other achievements. The following table is a representative sample, but not a full list, of awards received by Ball during the reporting period.

North American Metal Beverage Packaging

2010		2011	
Award	Reason	Award	Reason
MillerCoors' "Most Valuable Plant" Award in the category "Packaging Materials" (Tampa, Florida)	Contributions in areas such as quality, service, competitive cost, safety, corporate responsibility and innovation	Environmental Award: Pretreatment Partnership Award (Fort Worth, Texas)	10 years, 100 percent compliance with all local, state and federal wastewater pretreatment regulations
Technical Achievement Award by the International Metal Decorators Association	Resealable can end for Monster Energy drink	Sustainability Grant Award of the Wisconsin Manufacturing Extension Partnership (DeForest, Wisconsin)	Very successful compressed air reduction project
Wildlife at Work Certification (Rome, Georgia)	Certified Wildlife at Work Area	Wastewater Treatment "Gold Award" (Golden, Colorado)	Requirements and demonstrated commitment to environmental excellence
Gold Pretreatment Excellence Award (Williamsburg, Virginia)	No wastewater discharge Notices of Violation for the year	Gold Industrial Waste and Pretreatment Award (Williamsburg, Virginia)	High quality wastewater treatment
Special Safety Award (Findlay, Ohio)	Award for achieving 1,933,109 hours accident free from Hancock County Safety Council	Gold Pretreatment Excellence Award (Williamsburg, Virginia)	No wastewater discharge Notices of Violation for the year
		Significant Industrial User Award (Milwaukee, Wisconsin)	No notice of violation, no citations or fines for the previous 12 month period for wastewater discharge
		Energy Scout for Business (Hawaii)	Helping island-wide electricity grid stability

Food and Household Packaging

2010		2011	
Award	Reason	Award	Reason
Hormel "Spirit of Excellence Award" (Springdale, Arkansas)	Excellence in customer satisfaction	Award of Excellence (General Line) by the International Metal Decorators Association	Kikkoman Soy Sauce container
Award of Excellence by The International Metal Decorators Association	Ball's Sunshine Wheat beverage can produced with Eyeris® technology		
Award of Excellence (Aerosol) by the International Metal Decorators Association	Mequire's Hot Shine aerosol can		
Illinois Governor's Sustainability Award (Elgin, Illinois)	Innovative combustion burner maintenance program and compressed air system controls		
Abbot "Supplier Excellence Award" Abbott (3 rd year in a row)	Excellence in customer satisfaction		



Ball Aerospace & Technologies Corp.

2010		2011	
Award	Reason	Award	Reason
NASA Exceptional Public Service Medals	Outstanding work on the Kepler program	NASA Public Service Group Achievement Award to Ball Aerospace's Wide-field Infrared Survey Explorer (WISE) program team	Exceptional accomplishment in the design and test of the WISE spacecraft, and for meeting or exceeding all on-orbit performance requirements
Center Team Award from NASA's Langley Research Center (LaRC)	Recognition of a detailed technical assessment of a flight instrument stored at LaRC for a possible flight mission on the International Space Station	NASA Group Achievement Award to Ball Aerospace's EPOXI spacecraft team	Outstanding contribution to the sequencing and operation of the EPOXI Project, leading to the successful flyby of comet Hartley 2
NASA Group Achievement Award for the Sensor Test for Orion Relative Navigation Risk Mitigation (STORRM) Program	Fostering "extreme responsiveness", pushing the envelope of innovation, and completing the instruments and integration under tight schedules	Nunn-Perry Award to Ball Aerospace's outstanding Mentor-Protégé team	Superb performance of the team formed under the auspices of the DOD Mentor-Protégé Program
NASA Group Achievement Award for Ball Aerospace's Solar Backscatter Ultraviolet Radiometer (SBUV-2) team	Team's role in the successful launch of National Oceanographic and Atmospheric Administrations' (NOAA) N-Prime spacecraft	NASA Space Flight Awareness Award	Outstanding achievement on the Orion program

Ball Packaging Europe (BPE)

2010		2011	
Award	Reason	Award	Reason
Supplier of the Year	Coca-Cola Enterprises recognized the achievements of BPE in quality, service, value and sustainability	„Best Product in Retail 2011“	The beverage can won the readers vote award in the category "Environment"
"Rugby in bloom" award (Rugby, United Kingdom)	Appearance of plant and support of biodiversity	Award from Serbian Senior Citizen's Association (Belgrade, Serbia)	Support of "IV Third Age Olympic Games", including recan fund's pilot project "UBC Collection Among Third Age Citizens"
Award for the best environmental performance in the "Nord Pas de Calais" region (Bierne, France)	Biodiversity efforts onsite	Health & Safety award in the Polish "Safe Workplace Employer" competition (Radomsko, Poland)	Excellent health & safety performance



Ball Asia Pacific Ltd.

2010		2011	
Award	Reason	Award	Reason
Excellent Safety Operation Company (Hubei, China)	Safety management and performance	Excellent Safety Operation Company (Hubei, China)	Safety management and performance
Best Supplier Award (Shenzhen, China)	Kirin Brewery(Zhuhai) Co., Ltd.	Best Supplier (Shenzhen, China)	Shenzhen Pepsi-Cola Beverage Co.,Ltd.
Excellent Foreign Investment Enterprise in The Country (Shenzhen, China)		Best Supplier (Shenzhen, China)	Shenzhen Pepsi-Cola Beverage Co.,Ltd. Jiedong Branch
		Excellent Supplier (Shenzhen, China)	Budweiser Wuhan International Brewing Company, Ltd.
		National Excellent Enterprise with Foreign Investment (Shenzhen, China)	Labor Relationships
		"Best of Class" in two-piece Can Category of Asia CanTech Conference	Innovation and quality

Report Parameters

3.1 Reporting period for information provided.

The reporting period is for calendar years 2010-2011. We also provide 2009 information in this GRI Content Index when this allows for better interpretation of our performance over time.

3.2 Date of most recent previous report.

Ball’s second sustainability report was published in June 2010.

3.3 Reporting cycle (annual, biennial, etc.).

Biennial

3.4 Contact point for questions regarding the report or its contents.

[sustainability\[at\]ball.com](mailto:sustainability[at]ball.com)



3.5 Process for defining report content, including determining materiality, prioritizing topics and identifying stakeholders the organization expects to use the report.

Our 2010/2011 Sustainability Report reflects our focus on Ball's six corporate sustainability priorities: innovation, operations, talent management, recycling, supply chain and community. These priorities were identified based upon a comprehensive sustainability materiality analysis and feedback from customers, employees, investors, suppliers, government officials and nongovernmental organizations (NGOs). Corporate sustainability agendas evolve over time. New topics are put on corporate radars, while other topics become less or more important for our stakeholders and for Ball's future success. We are continually evaluating our sustainability priorities and aligning our approach and our sustainability reporting accordingly. Ball's latest sustainability "materiality matrix" can be accessed on www.ball.com.

Customers, employees, investors and suppliers are the primary target audience for our sustainability reporting. Media; federal, state and provincial government officials; local communities; NGOs; and trade associations are the secondary target audience.

3.6 Boundary of the report.

Ball's biennial sustainability reporting follows the GRI Reporting Framework. Part of the framework is the Technical Protocol on reporting boundaries, which we considered for establishing reporting boundaries.

Unless otherwise stated, we are reporting information globally from operations where we have operational control, including joint ventures where we are the majority owner. For economic, social, energy and water data, we also included our main administrative offices in the U.S. and in Germany. We do not cover any joint ventures in social data.

Acquisitions are included beginning the month after the acquisition was completed. New Ball operations whose data appears for the first time in our 2010/2011 reporting include our slug manufacturing operations in North America, Ball Aerocan in Europe and an acquired plant in China. Environmental information from the Latapack-Ball joint venture in Brazil is also included for the first time.

3.7 State any specific limitations on the scope or boundary of the report.

Please see 3.6.

3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations, and other entities that can significantly affect comparability from period to period and/or between organizations.

Please see 3.6.



3.9 Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to indicators and other information in the report.

Accurate and consistent data collection is integral to our sustainability management process. We further improved and harmonized our global sustainability data collection process during the 2010/2011 reporting period. For environmental indicators, we have used a software program since 2009 that allows for globally consistent data collection according to Ball's standard definitions. For Human Resources (HR) related data, we began the roll out of a global human resource information system that provides consistent tools utilized throughout our operations. During the 2012/2013 reporting period we will complete the global roll out of that system.

We identified some minor data inconsistencies for our previous sustainability reporting period (2008/2009). Where possible, we corrected these inconsistencies and marked those corrections with an * in this GRI Content Index. As we continue to develop and refine our data collection process, it is possible that we discover additional inconsistencies. If so, Ball will disclose them, and where possible, correct or adjust them, in future reporting.

3.10 Explanation of the effect of any restatements of information provided in earlier reports and the reasons for such restatement.

Certain 2008/2009 environmental data covered in our previous sustainability reporting contained some inconsistencies, due largely to the amount of manual labor involved at that time and the complexity and volume of data that needed to be consolidated from more than 60 facilities worldwide. We have refined and improved our reporting process and have been using a software system since 2009 to use our best efforts to collect and report the most accurate, reliable and complete data.

3.11 Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report.

In addition to the installation of global sustainability reporting software mentioned under 3.10, there were a significant number of changes in ownership of facilities which are detailed in 2.9.

3.12 GRI Content Index.

Ball's 2010/2011 GRI Content Index is available at www.ball.com/sustainability.



3.13 Policy and current practice with regard to seeking external assurance for the report.

We did not have our sustainability reporting audited by an external third party. We did have the report reviewed by external stakeholders and feedback was incorporated. Our internal audit department checked the accuracy and completeness of sustainability related data published in our 2010/2011 sustainability report. Internal Audit also reviewed the sustainability data collection software during 2011 and management action plans were developed and implemented accordingly.

Governance

4.1 Governance structure of the organization, including committees under the board of directors that are responsible for specific tasks, such as setting strategy or organizational oversight.

Information on our corporate governance highlights is available [here](#).

Information on our Corporate Governance Committee composition is available [here](#).

Our annual reports are available [here](#).

4.2 Indicate whether the chair of the board is also an executive officer and the reasons for this arrangement.

R. David Hoover is a non-management chairman of the board. He retired from Ball Corporation in January, 2011, after 41 years of service to the company.

4.3 State the number and gender of members of the board that are independent and/or non-executive members.

Nine of our 11 Board members are independent or non-executive members. The company's corporate governance guidelines state:

"The Board of the Corporation will have a majority of independent directors who meet the independence requirements set forth in Section 303A.02 of the Listing Company Manual of the NYSE, including any transition periods applicable to the requirements."



4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the board.

Ball Corporation has established methods for shareholders and others to send communications to the board. Persons interested in communicating with the board, its individual directors or its committees may send communications in writing via the corporate secretary or the chairman of the board. The communication should be sent by mail, in care of: Corporate Secretary, Ball Corporation, P.O. Box 5000, Broomfield, Colorado 80038-5000 or by fax to 303-460-2127.

In accordance with NYSE and SEC requirements, the corporation has established additional methods for interested parties to send communications to the board and selected committees which are described on the [corporation's website](#).

Shareholder proposals for inclusion in the corporation's proxy materials must be received and communicated as disclosed in our Proxy Statement:

"To be eligible for inclusion in the Corporation's Proxy Statement for the 2013 Annual Meeting of Shareholders, proposals of shareholders must be in writing and be received by the Corporate Secretary at the Corporation's principal executive offices, 10 Longs Peak Drive, Broomfield, Colorado 80021-2510, by November 9, 2012."

If a shareholder desires to bring business before the 2013 Annual Meeting of Shareholders, which is not the subject of a proposal submitted for inclusion in the Proxy Statement, the shareholder must notify the corporation of the shareholder's proposal, which must be delivered to or mailed and received at the principal executive offices of the corporation between December 26, 2012, and January 25, 2013, or the proposal may be considered untimely. The appointed proxies may exercise their discretionary authority to vote previously solicited proxies against any proposal raised at the 2013 annual meeting.

4.5 Linkage between compensation for board members, senior managers and executives (including departure arrangements) and the organization's performance (including social and environmental performance).

In addition to promoting prudent share ownership, Ball's executive compensation objectives and philosophy focus on rewarding performance. This means that shareholder returns, along with corporate, operating unit and individual economic value added performance, both short-term and long-term, determine the largest portion of executive pay. Generally, between 75 and 85 percent of the executive officer's pay, is performance based. When setting executive compensation, the corporation applies a consistent approach for all executive officers. It intends that the combination of elements of executive compensation closely aligns the executive's interest with those of the shareholders. Target total compensation is composed of base salary, annual economic value-added incentive compensation, long-term incentive compensation in the form of both cash and equity, and benefits. As a general rule, the Human Resources Committee of the board reviews and adjusts executive target total compensation levels annually in



October; however, equity grants are generally made in January. We do not currently include social or environmental performance in our compensation process.

4.6 Processes in place for the board to ensure conflicts of interest are avoided.

For more information on how Ball Corporation ensures against conflicts of interest, please see our [Business Ethics Handbook](#).

4.7 Process for determining the composition, qualifications and expertise of the members of the highest governance body and its committees incl. any consideration of gender and other indicators of diversity.

The Nominating/Corporate Governance Committee is responsible for assisting the board in fulfilling its responsibility to identify qualified individuals to become board members; recommending to the board the selection of board nominees for the next annual meeting of shareholders; addressing the independence and effectiveness of the board by advising and making recommendations on matters involving the organization and operation of the board, corporate governance guidelines, and directorship practices and overseeing the evaluation of the board and its committees. The Nominating/Corporate Governance Committee charter utilizes the standards set forth below for considering director nominees:

The committee seeks candidates who meet, at a minimum, the following criteria:

- (1) Candidates who demonstrate credentials and experience in a broad range of corporate matters;
- (2) Candidates who have experience and are focused on a broad range of corporate performance standards typical of publicly-traded companies headquartered in the United States;
- (3) Candidates who will subscribe to the finalized strategic and operating plans of the corporation as approved by the board from time to time;
- (4) Candidates who are not affiliated with special interest groups that represent major causes or constituents;
- (5) Candidates who meet the criteria, if any, for being a director of the corporation as set forth in the Indiana Business Corporation Law, the Articles of Incorporation, and Bylaws of the corporation;
- (6) Candidates who will subscribe to Ball Corporation's Corporate Governance Guidelines and the Executive Officers and Directors Ethics Statement; and
- (7) Candidates who have sufficient time to attend or otherwise be present at board, relevant board committee and shareholders' meetings.



4.8 Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance, and the status of their implementation.

Document	Status of Implementation	Sustainability Relevance
Our Core Values ⁽¹⁾	corporatewide	Solid foundation for our sustainability strategy
Business Ethics Handbook ⁽¹⁾	corporatewide	Prevention of corruption and bribery
Code of Conduct	corporatewide	Rules outlining the responsibilities of, and proper practices for, our employees
Corporate Policy Manual	corporatewide	Compliance and regulations guidelines
Environmental Policy	corporatewide	Outlines our commitment to reducing our impact on the environment
Health & Safety Policy	corporatewide	Outlines our commitment to proactively enhancing employee health and safety
Child and Forced Labor Policy	corporatewide	Outlines our policy on age limitations in hiring practices and forced labor
Human Rights Policy ⁽¹⁾	corporatewide	Outlines our policy on respecting human rights

⁽¹⁾ documents are available [online](#).

4.9 Procedures of the board for overseeing the organization's identification and management of economic, environmental and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.

Our board committee charters are available [online](#).

In 2007, the Nominating/Corporate Governance Committee assumed responsibility for the sustainability practices of Ball.

4.10 Processes for evaluating the Board's own performance, particularly with respect to economic, environmental and social performance.

Information on our Corporate Governance Guidelines is available [online](#).

4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organization.

Ball supports the application of the precautionary approach. It is especially considered by our risk management department and includes the identification and evaluation of potentially negative effects resulting from one of our products or processes.

Lightweighting of our packaging products (page 7 in our 2010/2011 Sustainability Report), increasing recycling rates (pages 20-23), lowering our energy consumption and CO₂ emissions (pages 8-11), lowering our water consumption (pages 12-13) and managing health and safety risks (pages 16-17) are examples of how we consider the precautionary approach in our business.



4.12 Externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or endorses.

Charter, Principles, Other Initiatives	Subscription/Endorsement since	Effect on/Activities by Ball
SAVE FOOD	2011	Campaign to fight global food loss, aiming at networking stakeholders in industry, politics and research, encouraging dialogue and helping to develop solutions along the food value chain to fight food waste
Better Buildings, Better Plants program	2010	Program partners demonstrate their commitment to energy savings by signing a voluntary pledge to reduce energy intensity by 25% over 10 years (Ball Packaging North America)
CORE	2009	CORE is a Colorado-based, non-partisan non-profit organization, dedicated to promoting sustainable business practices and a more responsible economy
Energy Star program	2007	Provides assistance on our energy management program
Carbon Disclosure Project	2007	Voluntary reporting of corporate wide carbon emissions

4.13 Member at the organizational level in associations (such as industry associations) or advocacy organizations.

We are a member in numerous associations and advocacy organizations on local, regional, national and international levels. The list below is a subset chosen by criteria such as strategic relevance, involvement in governing bodies, participation in projects and committees and provision of substantial funding beyond routine membership dues.

Region/Division	Association, Advocacy Organization	Web Link
North America	Can Manufacturers Institute	www.cancentral.com
North America	Consumer Aerosol Products Council	www.aerosolproducts.org
North America	Grocery Manufacturers Association	www.gmabrands.com
North America	Sustainable Packaging Coalition	www.sustainablepackaging.org
North America	National Association of Manufacturers	www.nam.org
North America	AMERIPEN	www.ameripen.org
North America	American Beverage Association	www.ameribev.org
North America	North American Metal Packaging Association (NAMPA)	www.metal-pack.org
North America	Consumer Specialty Products Association (CSPA)	www.cspa.org
North America	Colorado Association of Funders	www.coloradofunders.org
North America	Colorado Association for Commerce and Industry	www.cochamber.com
North America	Colorado Association for Recycling	www.cafr.org



Region/Division	Association, Advocacy Organization	Web Link
Ball Packaging Europe	Arbeitsgemeinschaft Verpackung und Umwelt e.V. (AGVU)	www.agvu.de
Ball Packaging Europe	The Association of European Producers of Steel for Packaging (APEAL)	www.apeal.org
Ball Packaging Europe	Beverage Can Makers Europe (BCME)	www.bcme.org
Ball Packaging Europe	Can Makers	www.canmakers.co.uk
Ball Packaging Europe	The European Organization for Packaging and Environment (EUROPEN)	www.europen.be
Ball Packaging Europe	Industry Council for Packaging and the Environment (INCPEN)	www.incpen.org
Ball Packaging Europe	La Boite Boisson	www.boiteboisson.com
Ball Packaging Europe	Latas de Bebidas	www.latasdebebidas.org
Ball Packaging Europe	Metal Packaging Europe (MPE)	www.metalpackagingeurope.org
Ball Packaging Europe	Metal Packaging Manufacturers Association (MPMA)	www.mpma.org.uk
Ball Packaging Europe	EHI retail institute	www.ehi.org
Ball Packaging Europe	AEROBAL	www.aerobal.org
Ball Packaging Europe	Syndicat national des fabricants de boites métalliques (SNFBM)	www.snfbm.fr
Ball Packaging Europe	The Packaging Federation	www.Packagingfedn.co.uk
Ball Packaging Europe	Alupro	www.alupro.org.uk
Ball Asia Pacific Ltd.	China Nonferrous Metals Industry Association Recycling Metal Branch	www.cmra.cn
Ball Asia Pacific Ltd.	China Packaging Federation	www.cpta.org.cn
Ball Asia Pacific Ltd.	Guangdong Beer Association	n.a.
Ball Asia Pacific (Tianjin) Plastic Containers Limited	China Plastics Processing Industry Association	www.cppia.com.cn
Ball Asia Pacific Shenzhen Metal Container Limited	China Beverage Industry Association	www.chinabeverage.org
Ball Aerospace & Technologies Corp.	American Astronomical Society	www.aas.org
Ball Aerospace & Technologies Corp.	American Meteorological Society	www.ametsoc.org
Ball Aerospace & Technologies Corp.	Coalition for Space Exploration	www.spacecoalition.com
Ball Aerospace & Technologies Corp.	National Space Club	www.spaceclub.org
Ball Aerospace & Technologies Corp.	National Defense Industrial Association (NDIA)	www.ndia.org
Ball Aerospace & Technologies Corp.	Space Foundation	www.spacefoundation.org
Ball Aerospace & Technologies Corp.	United States Geospatial Intelligence Foundation	www.usgif.org
Ball Aerospace & Technologies Corp.	Women in Aerospace	www.womeninaerospace.org



4.14 List of stakeholder groups engaged by the organization (civil society, customers, Employees, other workers, their trade unions, local communities, shareholders, providers of capital and suppliers.

Please visit www.ball.com/stakeholder-engagement for more details.

4.15 Basis for identification and selection of stakeholders with whom to engage.

Please visit www.ball.com/stakeholder-engagement for more details.

4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.

Please visit www.ball.com/stakeholder-engagement for more details.

4.17 Key topics and concerns that have been raised through stakeholder engagement and how the organization has responded, including through its reporting.

Please visit www.ball.com/materiality for more details. Also, please visit our [investor website](#).



ECONOMIC

Disclosure on Management Approach

Please see our [Annual Report](#) in conjunction with the following GRI indicators.

Economic Performance

20

EC1 Economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments.

	(\$ in millions)	<u>2011</u>	<u>2010</u>	<u>2009</u> ⁽²⁾
Economic Value Generated				
Revenues		8,630.9	7,630.0	6,710.4
Income from Minority Investments		10.1	118.0	13.8
		<u>8,641.0</u>	<u>7,748.0</u>	<u>6,724.2</u>
Economic Value Distributed				
Operating Costs - including payments to employees ⁽¹⁾		7,462.6	6,610.9	5,826.9
Payments to Capital Providers (Interest)		177.1	158.2	117.2
Payments to Government Tax Authorities		188.0	186.1	240.4
Payments for Charitable Contributions		2.3	2.0	2.6
Payments to Shareholders - Dividends & Share Repurchases		519.6	542.5	42.5
		<u>8,349.6</u>	<u>7,499.7</u>	<u>6,229.7</u>
Difference		<u>291.4</u>	<u>248.3</u>	<u>494.5</u>

⁽¹⁾ Includes cost of sales excluding depreciation and amortization plus selling, general administrative costs

⁽²⁾ Amounts have been restated to exclude the effect of discontinued operations of the company's 2010 sale of its plastics division

EC2 Financial implications and other risks and opportunities for the organization's activities due to climate change.

Each year senior managers and officers of Ball Corporation identify the key risks and opportunities facing Ball Corporation and each of the businesses in which we operate, including climate change, as follows:

Risks posed by climate change with potential financial implications for Ball:

- Significant weather changes around the globe and an increase in the frequency and severity of natural disasters may negatively affect our customers', suppliers' and our own operations (e.g. decreased agricultural productivity that may impact our food can business)
- Extreme weather conditions may affect our production facilities, disrupt our supply chain or impact demand for beverages and food



- Water scarcity and water quality, which can be affected by climate change in certain regions, may limit our customers', suppliers' and Ball's ability to operate their manufacturing operations
- Increased government intervention may cause operational and compliance costs to rise
- Prices for key raw materials, energy and water may increase
- Costs of managing risks through insurance and other means may increase

Opportunities posed by climate change with potential financial implications for Ball:

- Higher revenues in our aerospace business because of opportunities to study changing weather patterns
- Incentives to promote recycling of our metal packaging products
- Incentives to increase water use efficiency
- Incentives to develop innovative packaging solutions
- Incentives to increase energy efficiency
- Incentives to support our customer's sustainability initiatives

EC3 Coverage of the organization's defined benefit plan obligations.

Ball is committed to helping its employees prepare for retirement and provides various retirement benefits to help employees achieve their retirement savings goals. Ball provides pension plans that cover substantially all U.S., Canadian, German and U.K. employees meeting certain eligibility requirements. Employees in The Netherlands, France, Poland and Serbia are covered under governmental plans. Plans for North American hourly employees provide benefits based on fixed rates for each year of service. The defined benefit plans for employees in Germany and the U.K. provide pension benefits based on employee compensation and years of service. While the U.K. introduced a defined contribution scheme (benefit is based on the contributions made by the employee and the company into his or her pension) for all new employees from 2008, the defined benefit scheme, as above, remains the predominant form of retirement benefit. With the exception of the German plans, Ball's policy is to fund the plans on a current basis to the extent deductible under existing tax laws and regulations and in amounts sufficient to satisfy statutory funding requirements.

As of December 31, 2011, Ball managed pension assets with a fair market value of \$1.1 billion. Please refer to Note 14 in Ball Corporation's 10-K for the year ended December 31, 2011, for a more detailed description of the funded status of the various pension plans. We also have defined benefit pension obligations in France and Austria, the assets and liabilities of which are insignificant. For employees in the U.S., a 401(k) savings plan is provided where Ball matches a portion of employees' contributions.



EC4 Significant financial assistance received from government.

	(\$ in millions)	<u>2011</u>	<u>2010</u>	<u>2009</u>
Financial assistance received		-	-	-
Tax relief and credits		17,302	12,608	5,753
Government or other subsidies		17,022	2,333	912
Investment grant, research and development credits		3,040	3,785	1,118
Awards		-	-	-
Royalty holidays		-	-	-
Financial incentives		-	-	-
Other financial benefits		-	-	-
Total		<u>37,365</u>	<u>18,726</u>	<u>7,783</u>

Ball relies on skilled labor and support in the communities where it operates and in many cases local government authorities recognize the value of having an employer like Ball in their community. Ball is able to qualify for tax and other financial incentives in many areas throughout the world as some government authorities recognize the positive economic impact that companies like Ball have on their local communities.

Government is not present in Ball's shareholding structure.

Market Presence

EC5 Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.

The North American packaging workforce is compensated substantially above minimum wage rules. Also, the Aerospace workforce is compensated substantially above the minimum wage rules.

Our European remuneration policy is to pay employees at least competitively. In all unionized plants, pay agreements are in place that provide a salary package for the lowest job classes. The package is significantly above minimum wage levels if given by law. In nonunionized plants in Serbia and Poland, Ball has company pay schemes, which provide an average payment for each job class between the median and third quartile of the market.

Ball's Asia Pacific workforce is compensated above the local minimum wage rules.

**EC6 Policy, practices and proportion of spending on locally-based suppliers at significant locations of operation.**

Ball works with suppliers in many of the local communities in which we operate. We are focused on working with minority-owned and women-owned businesses as well as small businesses. However, Ball is not able to locally purchase raw materials such as aluminum and tinplate for metal packaging products, the largest component of our cost structure. These materials are only produced in a limited number of locations and by a limited number of suppliers throughout the world.

EC7 Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.

As we expand globally, we currently don't have a policy regarding local hiring, however, our common practices are to hire locally when the required talent is available.

Indirect Economic Impacts**EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.**

There were no infrastructure investments and services provided for public benefit through commercial, in-kind, or pro bono engagement during 2010/2011.

EC9 *Understanding and describing significant indirect economic impacts, including the extent of impacts.*

In early 2012, we had no systems in place to assess the indirect economic impacts Ball has at the national, regional or local level. However, we know that most of our plants are located in or near rural areas. This is particularly true for operations in the Americas and Europe. At many of these locations, Ball is the largest or among the largest employers in the area. By providing jobs and training, we positively influence the economic wealth and prosperity locally. Jobs in our supply and distribution chain are also impacted by our business.

Another example of indirect economic impacts is our packaging products, especially at the end of their lives. In several countries such as Brazil, China or in certain eastern European countries, some people make a living out of collecting and selling empty metal containers. Compared to other packaging substrates, metal scrap has a very high economic value. In countries without formal packaging collection, or waste management systems in general, people collect cans, sell those to local scrap dealers who then sell their materials to larger companies that recycle the products into new material. All of these processes create jobs or economic incentives.



ENVIRONMENTAL

Disclosure on Management Approach

Please see www.ball.com/operations in conjunction with the following GRI indicators.

Materials

EN1 Materials used by weight.

Raw Materials Consumption <i>(metric tons)</i>	2009	2010	2011
Aluminum	723,377	922,998	1,104,450
Steel	772,485*	791,334	698,005
Plastic pellets ⁽¹⁾	192,438	103,882	9,102

⁽¹⁾ North American Plastics Division sold in July 2010

Direct Material Usage <i>(metric tons)</i>	2009	2010	2011
Inks	1,988	2,302	2,448
Coatings	65,591	73,135	75,596
End compound	3,501	4,016	3,901

Associated Process Materials <i>(metric tons)</i>	2009	2010	2011
Bulk nitrogen	266	312	256
Welding wire used on can assembly lines	9,170	9,021	7,872
Gear lubes and oils	2,528	3,559	4,360
Acids, bases & washer chemicals	14,117	17,746	18,317
Copper sheet lube, body maker coolant	3,293	3,355	3,579
Cleaning solvents and detergents consumed (limited to those included in our VOC reporting)	818	1,203	1,533

Ball mainly uses aluminum and steel as raw materials in its manufacturing processes. Our emphasis has been to reduce these materials by lightweighting, where possible, the containers that we produce, both for cost savings and for environmental benefits.

Information about Ball's manufacturing processes is available [online](#).

EN2 Percentage of materials used that are recycled input materials.

Metals contain high percentages of recycled material. This value differs between regions and, sometimes, is calculated in different ways. Based on the definition of "recycled content" in North America, for example, the recycled material in the metal used for beverage can manufacturing is at 68 percent, the highest value of all packaging substrates (source: Aluminum Association, 2010). Percentages for other regions and for steel can be found on the respective websites of aluminum and steel associations.



In 2010, Ball acquired two aluminum slug manufacturing facilities in North America, becoming the world's largest producer of aluminum slugs. These metal disks are impact extruded to produce packaging for products such as aerosol body sprays or beer. Ball also acquired a joint venture slug facility and three extruded aluminum packaging facilities in Europe in 2011. At that time, almost all aluminum slugs in the world were produced from virgin aluminum containing no recycled material. During 2011, Ball leveraged its global metal packaging platform and extensive packaging expertise to develop a technology innovation that allows the use of recycled material in the manufacture of slugs. The resulting new metal alloy exhibits increased strength and enables Ball to lightweight its extruded aluminum aerosol packaging by as much as 10 percent, with further lightweighting expected in the future. We are excited about ReAl™ and will bring this new solution to our customers around the world in 2012 and beyond.

Please also see pages 6/7 and 20/21 in our 2010/2011 Sustainability Report.

Energy

EN3 Direct energy consumption by primary energy source.

Direct Energy Use (kWh)	2009	2010	2011
Natural gas and propane as fuel	1,400,418,927	1,589,108,416	1,771,990,059
Propane for forklifts/misc.	17,142,914	19,171,851	20,104,024
Diesel	1,818,353	2,028,850	2,231,464
Total	1,419,380,194	1,610,309,117	1,794,325,547

Direct energy sources used in Ball's manufacturing processes are natural gas, propane and diesel fuels.

EN4 Indirect energy consumption by primary source.

Indirect Energy Use (kWh)	2009	2010	2011
Electricity	1,660,991,478	1,626,190,808	1,588,385,685
Hot water	3,456,100	2,886,200	3,499,400
Total	1,664,447,578	1,629,077,008	1,591,885,085

EN5 Energy saved due to conservation and efficiency improvements.

Please see pages 8-11 in our 2010/2011 Sustainability Report.



EN6 Initiatives to provide energy efficient or renewable energy-based products and services and reductions in energy requirements as a result of these initiatives.

Please see pages 8-11 in our 2010/2011 Sustainability Report.

EN7 Initiatives to reduce indirect energy consumption and reductions achieved.

Please see pages 8-11 in our 2010/2011 Sustainability Report.

Water

EN8 Total water withdrawal by source.

Municipal water use (cubic meters)	2009	2010	2011
North America	3,264,314*	3,532,815	3,226,348
South America	1,797*	1,615	304,309
Europe	1,406,351*	1,444,538	1,575,845
Asia Pacific	537,335	751,963	1,053,663
Total	5,209,797*	5,730,930	6,160,165

EN9 Water sources significantly affected by withdrawal of water.

A consultant determined the water sources which were being affected by Ball's North American packaging facilities withdrawal of water in 2007. The consultant's report indicates that no water sources at that time were significantly affected by water withdrawn by Ball. Since then, we have not conducted new water withdrawal surveys.

EN10 Percentage and total volume of water recycled and reused.

Ball utilizes every opportunity to reuse and recycle water in our manufacturing processes. Ball's most significant use of water is in manufacturing beverage cans – specifically, washing the cans after forming in a multi-stage washer. The washers use a counterflow technology. This process allows the cleanest water in the washer (final rinse stages) to counterflow to the beginning stages of the washer, therefore maximizing the water utilization.

For more information, please see pages 12/13 in our 2010/2011 Sustainability Report.



Biodiversity

EN11 Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.

Ball does not own land in designated, protected areas as our facilities generally are located in industrial zoning sites. According to our environmental policy, we operate in an environmentally responsible manner wherever we are located. Twenty-two acres of land on our 56-acre plant site in Rome, Georgia, has been certified as a “Wildlife at Work” site by the Wildlife Habitat Council – a nonprofit, non-lobbying group of corporations, conservation organizations and individuals dedicated to enhancing and restoring wildlife habitat. Rome employees have built nesting structures on the land to enhance habitat for birds of prey. They also constructed wildflower gardens to improve habitat for native pollinators.

Another example of how Ball actively supports biodiversity was implemented at our Bierne, France, plant in 2010. When we built a new watershed basin for rainwater, we developed a small biotope on top of it. Numerous animals and regional plants have settled there. Our employees use the grounds for their breaks and we inform them and visitors about the biodiversity matters. This initiative has been rewarded with the “Environmental Performance Award” by the regional chamber of commerce and the trophy of the best environmental performance in our region by the north regional council and the French environmental ministry.

Emissions, Effluents and Waste

EN16 Total direct and indirect greenhouse gas emissions.

CO ₂ Emissions by Source (<i>metric tons</i>)	2009	2010	2011
Direct CO ₂ emissions	300,958	374,567	363,599
Indirect CO ₂ emissions	942,842	1,067,464	959,389
Total	1,243,800	1,442,031	1,322,988

EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved.

Please see pages 8-11 in our 2010/2011 Sustainability Report as well as our latest answers to the [Carbon Disclosure Project](#).

EN19 Emissions of ozone-depleting substances.

Ozone depleting substances released by Ball facilities are considered to be insignificant and below permissible limits for reporting purposes. Therefore, they are not currently tracked. Ozone depleting substances that are used are only used in small quantities, such as electrical part cleaners or chlorofluorocarbon (CFC) from air-conditioning systems.



EN20 NO_x, SO_x, and other significant air emissions.

Emissions (<i>metric tons</i>)	2009	2010	2011
NO _x	209*	236	268
SO _x	1.21*	1.37	1.54
VOC before control	14,797*	14,655	14,957
VOC after control	4,311*	5,075	5,506
Particulates	15.25*	17.46	19.73

28

The U.S. EPA developed a standard to measure air quality for six criteria pollutants. For each criteria pollutant, a maximum concentration of exposure was established. The six criteria pollutants – ozone, lead, particulate matter, carbon monoxide, nitrogen dioxide and sulfur dioxide – are present worldwide. For Ball, criteria pollutants are emitted as a result of the manufacturing process for aluminum cans, steel cans and plastic bottles. Criteria pollutants are released mainly through metal coating and curing processes.

The release of criteria pollutants from Ball's facilities is minimized through the use of controls such as Regenerative Thermal Oxidizers (RTOs). RTOs work by providing thermal treatment of Volatile Organic Compounds (VOCs) with heat and oxygen. VOCs react with sunlight to form low level ozone. For example, when VOCs are exposed to heat and oxygen in the RTOs, they can be converted to CO₂, water vapor and heat that can be reused. All of our RTOs have a destruction efficiency of between 95 and 99 percent.

EN21 Total water discharge by quality and destination.

Water discharge is estimated at 90 percent of total water withdrawal. The pollutant loading water, or water with a total quantity of pollutants being discharged from our facilities, is measured irregularly. Typically, the Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) get measured.

BOD is a procedure for determining how fast biological organisms use oxygen in a body of water. BOD is an indication of the quality of a water source. BOD can be used to gauge the effectiveness of wastewater treatment plants. Pristine rivers will have a BOD below 1 mg/l. Municipal sewage that is efficiently treated is about 20 mg/l. Oil is a major contributor to BOD.

TSS are the dry weight of particles trapped by a filter, typically of a specified pore size. It is a measure of the quantity of solids in the water. Aluminum can plants have pretreatment wastewater systems to treat solid pollutants such as aluminum, magnesium, fluoride and phosphorus, oils and acidic or caustic waters in can-washing water before being discharged to a publicly owned treatment works.



EN22 Total weight of waste by type and disposal method.

Please see pages 14-15 in our 2010/2011 Sustainability Report.

EN23 Total number and volume of significant spills.

Spills (Reportable to government organizations)	2009	2010	2011
Reportable spill quantities (kilograms)	55	0	10,000
Number of spills	1	0	1

29

In April 2011, there was one spill that occurred on the premises of a neighboring industrial area that affected our site in Rugby, United Kingdom. An underground water pipe became congested and as a consequence, some 10 cubic meters of sewage leaked on to our site. Crisis management in our plant worked effectively and local authorities were satisfied with how this case was handled.

Our manufacturing process uses a variety of materials such as lubricants or water- and solvent-based coatings. The majority of these materials are delivered in bulk to minimize the potential for releases. Ball facilities have implemented procedures and engineered controls to prevent or mitigate releases. Examples of engineered controls are designated unloading/loading areas with containment and the storage of materials in areas with containment. In the unlikely event of a release, immediate actions are taken to mitigate any potential environmental impact.

Products and Services

EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.

Please see pages 6/7 and 20-23 in our 2010/2011 Sustainability Report.

EN27 Percentage of products sold and their packaging materials that are reclaimed by category.

Metals and metal packaging have unique recycling capabilities, not only because our metal cans are 100 percent and infinitely recyclable. We engage in several of our markets to further optimize collection and recycling and to ultimately further increase recycling rates of our products. For more information, please see pages 20-23 in our 2010/2011 Sustainability Report.



Compliance

EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.

In our aerospace and in our European operations, there were no fines or notices of violations. In our North American packaging operations, there were seven notices of violation and one warning notice associated with air and wastewater issues. Fines associated with these violations totaled \$10,695. In BAPL, one improvement notice was issued for our plant in Shenzhen, China, when a fluoride limit was exceeded but no fines were assessed.

Transport

EN29 Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.

Ball does not operate its own truck fleet to transport our products. However, we have introduced several transport-related programs to reduce related environmental impacts. For more information, please see pages 24/25 in our 2010/2011 Sustainability Report.

Overall

EN30 Total environmental protection expenditures and investments by type.

Ball expenditures specifically related to environmental protection are not tracked and categorized. The expenditures are made to keep the company in compliance with Ball standards and regulatory requirements worldwide. Examples of expenditures are:

- Maintenance and energy costs for air pollution control equipment
- Maintenance, energy, and chemical costs for water pollution control equipment
- Waste and recycling costs
- Permit, license, operating fees, and emission credit purchases linked to emissions and discharges
- Personnel and expenses related to operation of an internal environmental compliance management system
- On and off site soil and groundwater remediation obligations
- Capital equipment for control of air emissions and water discharges
- Review of environmental issues related to property transfer, acquisition and divestiture



LABOR PRACTICES AND DECENT WORK

Disclosure on Management Approach

Please see www.ball.com/talent-management in conjunction with the following GRI indicators.

Employment

31

LA1 Total workforce by employment type, employment contract and region, broken down by gender.

	2010			2011		
	total	Male	Female	total	Male	Female
Global						
salaries	6,512	4,766	1,746	5,851	4,189	1,662
hourly	7,096	6,467	629	8,441	7,571	870
North America (NA)⁽¹⁾						
salaries	1,603	1,152	451	1,565	1,103	462
hourly	4,995	4,404	591	4,787	4,257	530
South America (SA)						
salaries	73	57	16	67	53	14
hourly	231	229	2	231	229	2
Ball Aerospace (BATC)						
salaries	2,612	1,893	719	2,760	2,013	747
hourly	0	0	0	0	0	0
Ball Packaging Europe (BPE)						
salaries	837	573	264	984	657	327
hourly	1,870	1,834	36	2,381	2,273	108
Ball Asia Pacific (BAPL)						
salaries	1,387	1,091	296	475	363	112
hourly	0	0	0	1,042	812	230

⁽¹⁾ does not include Canadian retirees

- Employee counts represent year-end figures.
- Ball Corporation does not employ a significant number of part-time or temporary staff.
- The only employment contract we are reporting on is defined as Indefinite or Permanent.
- Ball did not differentiate between salaried and hourly in BAPL for 2010.



LA2 Total number and rate of new employee hires and employee turnover by age group, gender, and region.

Global		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	683	540 79%	143 21%	257 38%	333 49%	93 13%
	# & Rate of employees leaving	2,038	1,600 79%	438 21%	385 19%	958 47%	695 34%
2011	# & Rate of New Hires	1,371	1,079 79%	292 21%	561 41%	661 48%	149 11%
	# & Rate of employees leaving	1,408	1,104 78%	304 22%	358 25%	507 36%	543 39%

- Rate is calculated using total employee numbers at the end of the reporting period.
- New hires are employees hired within the year being reported.
- Included in employees leaving the organization are voluntarily departures or those due to dismissal, retirement or death.

NA ⁽¹⁾		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	291	248 85%	43 15%	78 27%	167 57%	46 16%
	# & Rate of employees leaving	1,688	1,320 78%	368 22%	269 16%	792 47%	627 37%
2011	# & Rate of New Hires	456	394 86%	62 14%	133 29%	266 58%	57 13%
	# & Rate of employees leaving	796	647 81%	149 19%	180 23%	240 30%	376 47%

⁽¹⁾ does not include Canadian retirees.

BATC		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	149	105 70%	44 30%	37 25%	75 50%	37 25%
	# & Rate of employees leaving	21	17 81%	4 19%	2 10%	0 0%	19 90%
2011	# & Rate of New Hires	292	218 75%	74 25%	84 29%)	145 50%	63 22%
	# & Rate of employees leaving	156	103 66%	53 34%	48 31%	39 25%	69 44%



SA		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	18	15 83%	3 17%	4 22%	13 72%	1 6%
	# & Rate of employees leaving	22	18 82%	4 18%	4 18%	15 68%	3 14%
2011	# & Rate of New Hires	39	35 90%	4 10%	12 31%	26 67%	1 3%
	# & Rate of employees leaving	42	39 93%	3 7%	5 12%	29 69%	8 19%

BPE		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	87	62 71%	25 29%	47 54%	38 44%	2 2%
	# & Rate of employees leaving	151	126 83%	25 17%	38 25%	77 51%	36 24%
2011	# & Rate of New Hires	288	229 80%	59 20%	128 44%	138 48%	22 8%
	# & Rate of employees leaving	225	177 79%	48 21%	59 26%	94 42%	72 32%

BAPL		Total	Male	Female	<30	30-50	>50
2010	# & Rate of New Hires	138	110 80%	28 20%	91 66%	40 29%	7 5%
	# & Rate of employees leaving	156	119 76%	37 24%	72 46%	74 47%	10 6%
2011	# & Rate of New Hires	296	203 69%	93 31%	204 69%	86 29%	6 2%
	# & Rate of employees leaving	189	138 73%	51 27%	66 35%	105 56%	18 10%

LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operations.

None of Ball Corporation’s global businesses has a significant number of part-time or temporary employees. We do offer significant benefits to our predominately full-time workforce, as detailed below.

North America and BATC

Full-time benefits include: Paid holidays, vacation, paid sick time, medical/dental coverage, COBRA, matching gifts, flexible spending accounts, life insurance, accidental death & dismemberment insurance, long-term disability insurance, salary continuation



insurance, 401(k), Employee Stock Purchase Plan, travel insurance, worker's compensation, education assistance, JW Fisher Scholarship for eligible employee children, service awards, severance pay, pension plan and retiree medical plans.

BPE

Benefits vary by country and it is the strategy of Ball to provide benefits at least in line with the market. All employees in Europe have some portion of their salary which is incentive based. For management employees, the incentive payment is based on financial performance. For non-management employees, incentive payment is based on a mix of financial performance and operational performance. Other benefits such as pension plans may differ between full time and part time employees depending on the ratio of actual working time to full time employment. Some pension plans require a specific period of employment, in line with local legislation, before a claim becomes vested.

BAPL

Benefits provided to regular employees include: production incentive, meal allowance, housing provident fund, marriage gift, birthday gift, single-child gift, funeral gratuity and labor union fee and participation in recreational activities organized by union.

Benefits are offered to temporary employees only at BPE.

LA15 Return to work and retention rates after parental leave, by gender

Although Ball Corporation does not track retention rates after parental leave, we do encourage all employees to take leave when and if necessary. Globally, we adhere to all required statutes and well as offer additional benefits as described in LA3.

Labor/Management Relations

LA4 Percentage of employees covered by collective bargaining agreements.

Percentage of total employees covered by CBA	2010		2011	
	Global	5,997	44%	5,921
NA⁽¹⁾	2,507	38%	2,287	36%
SA	261	86%	241	81%
BATC	0	0	0	0
BPE	2,227	83%	2,390	73%
BAPL	1,002	72%	1,003	66%

⁽¹⁾ does not include Canadian retirees



LA5 Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.

NA and BATC

In North America, Ball Corporation notifies employees of impending layoffs as required by applicable local, state and federal law, including the federal WARN Act (minimum 60 day notice required), and sooner if possible. In some cases collective bargaining agreements extend the minimum notice period to 90 days. The WARN Act does not apply in Canada, but Ball follows the Canadian notice requirements.

BPE

Applies to non-management and is settled in collective agreements.

- In Germany, depending on seniority, the minimum notice periods varies from four weeks to seven months.
- In France, depending on the employment category, this period would vary from two months to one year.
- In the Netherlands, depending on employment category, it varies from one to two months.
- In the UK, depending on the reason for the operational change, minimum notice periods vary from two months to 12 weeks.
- In Serbia, depending on the employment category, minimum notice periods vary from one to three months.
- In Poland, depending on seniority, this can vary from three days to three months.

BAPL

Ball's practice in Asia is to give 30 days of advance notice for significant operational changes. This is not a legal requirement.

Occupational Health and Safety

LA6 Percentage of total workforce represented in formal joint management/worker health & safety committees that help monitor and advise on occupational health & safety programs

A workforce that is engaged in the health and safety of the work environment is critical to our operations. All North American Ball Corporation facilities have formal management/worker health and safety committees. The percentage of the workforce represented in those committees was not monitored during the 2010/2011 reporting period.



LA7 Rates of injury, occupational diseases, lost days and absenteeism and number of work-related fatalities by region and gender.

Ball Corporation does not monitor rates of occupational injury or disease by region or by gender. The global rates of injury, occupational disease, lost days and the number of work-related fatalities are noted in the following table:

	2007	2008	2009	2010	2011
Lost-time rate	0.82	0.74	0.45	0.48	0.41
Total recordable injuries rate	3.90	3.20	2.40	2.25	1.70
Severity rate	31.80	17.60	14.90	13.20	17.42
Work-related fatalities	1.00	0.00	0.00	0.00	0.00

For more information, please see pages 16/17 in our 2010/2011 Sustainability Report.

LA8 Education, training, counseling, prevention and risk-control programs in place to assist workforce members, their families or community members regarding serious diseases.

Ball Corporation trains personnel in all locations on blood-borne pathogens to prevent the spread of hepatitis, HIV and other serious blood-borne illnesses. Training emphasizes prevention, emergency response and clean-up actions in the event of a biohazard spill. Additionally, Ball Corporation maintains a pandemic response program to address the eventuality of pandemic events.

Ball Corporation has an established employee wellness program for employees in North America and Europe. More information is available [online](#).

LA9 Health and safety topics covered in formal agreements with trade unions.

Ball focuses on employee health and safety for all employees, unionized and nonunionized. While some safety concerns such as safety gear, employee committees and first aid facilities are addressed in formal agreements, these are all available to nonunionized workforces as well. All of our health and safety policies, programs and resources are available to all our employees.

Training and Education

LA10 Average hours of training per year per employee by gender and by employee category. Highlight training, performance review, and career strengths.

Ball employees complete a significant amount of training, both through mandatory courses at the start of their employment, and also through required and voluntary skills development and refresher training throughout their careers. Unfortunately, we do not currently have a data management system that can track training hours across the company, but we hope to report more quantitatively on this in the future.



Please see LA11 and LA12 for further narrative information on skills management and performance reviews.

LA11 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.

37

Professional development opportunities at Ball are plentiful, and vary by both region and industry. Below are some examples of both mandatory and voluntary training programs in each of our major global regions.

NA

- Requires an initial 40 hours of “Fundamentals of Leadership” training for all new supervisors and managers.
- Requires 24 hours of “Great Leaders, Great Teams, Great Results” training for all factory individuals at a manager level or above.
- Provides personal development opportunity via *The 7 Habits of Highly Effective People* workshops
- Makes available hundreds of online courses, which are available to all employees.
- Provides a Tuition Reimbursement Program for degree-related courses.
 1. In 2010, 87 people participated in this program, receiving over \$262,154.67 in tuition assistance.
 2. In 2011, 63 people participated in this program, receiving over \$159,394.06 in tuition assistance.
- Provides numerous courses related to the succession planning system, as required for professional development.
- Maintains a career planning page on the company intranet to assist employees with their professional development.

BATC

- Provides an initial “management basics” training, titled Management Essentials to a target audience of leads and supervisors. This learning series consists of 38 3-hour workshops that participants can select from to build individual learning plans to support performance in current role and/or prepare them for future progression.
- Provides an additional 40-hour leadership development offering, titled Fundamentals of Leadership for managers with a minimum of two direct reports.
- Makes available hundreds of online courses via SkillSoft which are available to all employees.
- Offers a variety of optional classes and coaching activities to improve professional and life skills.
- Supports a web-based Competency Development Guide (CDG) that lists a wide-range of development options related to the Company’s core competencies. Development options include internal, external and online courses, self-study packets, on the job assignments, books, podcasts and apps.



- Provides a College Education Assistance program to employees pursuing undergraduate and graduate degrees. In 2010, 181 employees participated in the program with Ball's contribution totaling \$704,134.87. In 2011, 160 employees participated in the program with 18 completed degrees that year and Ball's contribution totaling \$728,686.
- Enables supervisors to send employees to external seminars and workshops related to their jobs and authorizes training budgets to be used for that purpose.
- Provides personal development opportunities via *The 7 Habits of Highly Effective People* workshops

SA

- Latapack-Ball Leadership Program for supervisors and new managers (40 hours of training). It includes modules of: Basics of Leadership, *The 7 Habits of Highly Effective People*, Union Relations, Finance Planning and Situational Leadership.
- Executive Leadership Program for senior management. This program was developed in partnership with Brazilian Business Schools ranked in the *Financial Times*. Modules of: Strategic Planning, Critical Thinking, Finance Management, Operations Management.
- Scholarship Tuition for English skills development (63) and college degree (10).
- Monthly leadership meetings with specific development themes (Feedback, Communication, and other information). These meetings target the plant supervisor.
- E-Learning Implementation with leadership online training (feedback/ Performance Evaluation, and other information), articles about leadership, movies, podcasts.

BPE

- Employees receive an introduction to relevant subjects (including Health & Safety) in their location
- Gives an orientation to new employees in the BPE Employee Can School
- Fosters new-graduate talents in the BPE Trainee Program
- Non-management employees annually discuss their development needs with their supervisors and agree on corresponding measures.
- Managerial staff receives annual performance reviews including analysis of development needs.
- Offers a variety of training on personal competencies, professional competencies, methods, practical skills and leadership.
- Enables supervisors to send employees to external seminars and workshops related to their jobs and authorizes training budgets to be used for that purpose.
- Requires an initial 3-day "BPE Leadership Training" with follow-up exercises for all new supervisors and managers. If language requirements are not met, external classes are provided.
- Offers further leadership training via Ball Corporation ("Great Leaders, Great Teams, Great Results" and "LEAD".)
- Offers development measures tailored to individual needs to foster personal growth (e.g. coaching, mentoring).



BAPL

- Has a company-sponsored program to encourage employees to participate in external job-related programs that add to life-long learning and skills management. Examples include English Skills, Labor Relations, ISO 9001 Internal Auditor and Supervisory Skills. In-house supervisory programs such as meeting skills teamwork training are also organized for the plant supervisors.
- Organizes internal training courses for job skills, job enhancement and safety awareness. Examples include forklift operation, fire prevention & standard operating procedures.

LA12 Percentage of employees receiving regular performance and career development reviews by gender.

	2011 Male	2011 Female
NA		
Salaried	92%	89%
Hourly (non-union) ⁽¹⁾	4%	4%
Total	22%	44%
BATC⁽²⁾		
Salaried	87%	89%
BPE⁽³⁾		
Salaried	75%*	75%*
BAPL		
Salaried	100%	100%

⁽¹⁾ Collective bargaining agreements prevent Ball from conducting performance appraisals in union plants for hourly employees.

⁽²⁾ Aerospace employees hired after mid-year are not required to receive performance appraisals.

⁽³⁾ There is no differentiation possible between male/female employees.



Diversity and equal Opportunity

LA13 Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity. Include indicators and examples of diversity, plus equal opportunity monitoring.

	2010			2011		
	Total	Male	Female	Total	Male	Female
Global						
Board of Directors	12	10	2	12	10	2
Executive Leadership Team	17	16	1	17	16	1
NA⁽¹⁾						
Salaried Team	1,603	1,152	451	1,565	1,103	462
Hourly Team	4,995	4,404	591	4,787	4,257	530
SA						
Salaried Team	73	57	16	73	57	16
Hourly Team	231	229	2	231	229	2
BATC						
Salaried Team	2,612	1,893	719	2,760	2,013	747
Hourly Team	0	0	0	0	0	0
BAPL						
Salaried Team	1,387	1,091	296	1,517	363	112
Hourly Team	0	0	0	0	812	230

⁽¹⁾ does not include Canadian retirees

	Total	2010		2010		2010	
		<30		30-50		>50	
		M	F	M	F	M	F
Global							
Board of Directors	12	-	-	-	-	-	-
Executive Leadership Team	17	-	-	-	-	-	-
NA							
Salaried Team	1,603	27	18	494	214	631	219
Hourly Team	4,995	260	13	2,105	261	2,039	317
BATC							
Salaried Team	1,944	85	25	768	245	652	169
Hourly Team	668	23	15	164	109	201	156



	Total	2011 <30		2011 30-50		2011 >50	
		M	F	M	F	M	F
Global							
Board of Directors	12	-	-	-	-	-	-
Executive Leadership Team	17	-	-	-	-	-	-
NA							
Salaried Team	1,565	28	17	458	222	617	223
Hourly Team	4,787	277	13	2,021	222	1,959	295
SA							
Salaried Team	73	9	1	44	12	15	3
Hourly Team	231	49	0	147	2	33	0
BATC							
Salaried Team	2,760	135	51	934	348	944	348
Hourly Team	0	0	0	0	0	0	0

	Total	2010				Total	2011			
		Minority		Non-minority			Minority		Non-minority	
		M	F	M	F		M	F	M	F
NA										
Salaried Team	1,603	105	64	1,047	387	1,565	95	67	1,008	395
Hourly Team	4,995	868	180	3,536	411	4,787	785	147	3,472	383
SA										
Salaried Team	-	-	-	-	-	73	-	-	-	-
Hourly Team	-	-	-	-	-	231	-	-	-	-
BATC										
Salaried Team	2,612	163	111	1,730	608	2,760	175	113	1,838	634
Hourly Team	0	0	0	0	0	0	0	0	0	0

Equal Remuneration For Woman and Men

LA14 Ratio of basic salary and remuneration of women to men by employee category, by significant locations of operation

It is the philosophy of Ball Corporation to reward all employees equitably based on their competitive labor market data, performance levels and contributions to Ball Corporation while ensuring adherence to all applicable laws and regulations. Based on the limited data available, Ball Corporation’s ratio of annual salary of women to men, on average globally is 0.95:1.00, including management, staff and production employees.



HUMAN RIGHTS

Disclosure on Management Approach

Please see www.ball.com/talent-management in conjunction with the following GRI indicators.

Investment and Procurement Practices

42

HR1 Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns or that have undergone human rights screening.

During the reporting period, Ball Corporation did not have any investment agreements or contracts that include clauses incorporating human rights concerns or that have undergone human rights screening and contracts that would be defined as significant.

HR2 Percentage of significant suppliers and contractors and other business partners that have undergone screening on human rights screening and actions taken.

We do not currently screen suppliers on adherence to human rights issues. Our Supplier Guiding Principles (available at www.ball.com/supply-chain) addresses human rights and our expectation is that suppliers and contracts adhere to certain principles related to human rights. Ball is currently requesting that its suppliers sign two additional certification documents regarding conflict minerals and forced labor and slavery. In 2009, the United States Congress passed the Wall Street Reform Act. Section 1502 of this Act required all entities that report to the Securities and Exchange Commission (SEC) to file disclosures with the SEC about whether it sourced certain minerals from the Democratic Republic of Congo ("DRC") and any adjoining countries. While the SEC regulations associated with Section 1502 were to be issued in April 2011, the SEC has yet to issue definitive regulations on this complex policy issue. Regardless, Ball began with its tinplate suppliers, requesting that the first-tier suppliers provide compliance documents. Ball has since requested that its other suppliers for both its packaging and aerospace divisions provide a compliance document that each supplier does not source the minerals in question from DRC and any adjoining countries. Additionally, Ball is also requesting that its suppliers provide a compliance document pursuant to the California Transparency in Supply Chains Act of 2010, that its supply chain does not engage in forced labor or slavery.



HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.

As described in LA10, employees attend various trainings throughout their time at Ball. At the time of hire all employees receive the corporate policies to review. In 2012, Ball is implementing a new compliance training program that will require all employees to attend training on a bi-annual schedule. This training will cover all policies, which includes the Human Right policy.

Non-Discrimination

HR4 Total number of incidents of discrimination and corrective actions taken.

Ball does not tolerate unlawful harassment in the workplace whether it is based on race, color, religion, national origin, sex, age, sexual orientation, disability or any other characteristic protected by applicable law. Additionally, Ball does not tolerate unlawful retaliation in response to complaints or investigations of discrimination or harassment complaints.

As with other large companies, Ball does from time to time receive allegations of discrimination and harassment. Most are quickly resolved – involving a misunderstanding, simple mistake or occasionally a false allegation. Any more serious allegations are handled through a formal, documented investigation conducted by human resources, the law department and appropriate management personnel. This would include both internal complaints and charges filed with an outside agency. Resolution generally occurs when the investigation is concluded and any necessary corrective actions are taken, such as disciplinary action or termination of employment. In theory, there could be an even more serious occurrence in which formal charges or lawsuits result in court findings of discrimination or harassment, but Ball did not incur this type of discrimination or harassment finding during the reporting period.

North American Packaging

North American Packaging received nine Equal Employment Opportunity or comparable state agency charges (“EEOC”) in 2010. Settlement was reached with respect to one charge. The remaining charges were dismissed and the EEOC issued a notice of right to sue. The right to sue period expired with respect to seven charges without suit being filed. One charging party exercised the right to sue and filed a private lawsuit.

North American Packaging received 11 EEOC charges in 2011. Settlements were reached with respect to two charges. Six of these charges were dismissed and the EEOC issued a notice of right to sue. The right to sue period has not yet expired on two of these charges. The right to sue period expired in one charge without suit being filed. One charging party exercised the right to sue and filed a private lawsuit. Five charges are pending. One additional private lawsuit was filed in 2011.



Ball Aerospace & Technologies Corp.

Ball Aerospace & Technologies Corp. (BATC) received two EEOC charges in 2010. One charge was dismissed and the EEOC issued a notice of right to sue. The charging party did not file a lawsuit. One charge was settled. BATC received no EEOC charges in 2011. The right to sue period expired in December 2011 from an EEOC charge filed in 2009. The right to sue was exercised in this case and a private lawsuit was filed in 2011.

Ball Packaging Europe

Ball Packaging Europe received two complaints in 2010 and three complaints in 2011. Corrective actions were taken and all complaints were resolved.

44

Ball Asia Pacific Ltd.

Ball Asia Pacific Ltd. had no incidents or records of discrimination in 2010 or 2011.

Freedom of Association and Collective Bargaining

HR5 Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.

Ball Corporation does not have any areas considered to be at risk. In support of the right to freedom of association and collective bargaining, the company trains managers, supervisors and employees in these areas.

Child Labor

HR6 Operations and significant suppliers identified as having significant risk for incidents of child labor, and measures taken to contribute to the effective abolition of child labor.

Ball has no operations that are considered to be at risk. We continue, however, to be vigilant through global policies and programs complemented with regular audits. For plants in China, management at the Ball Asia Pacific Ltd. office works closely with third party professional bodies to launch corporate social responsibility audits for customers. We have a corporate policy forbidding child and forced labor. Ball has also taken numerous steps regarding the requirements of the California Transparency in Supply Chains Act of 2010, including revising Ball's corporate policy to address slavery specifically, developing a revised set of Supplier Guiding Principles and a compliance document for its suppliers, and implementing training of the employees involved in supply chain management.

The following documents are available on www.ball.com/sustainability:

- Human Rights Policy
- Business Ethics Book
- Transparency in Supply Chain Act Disclosure



Forced and Compulsory Labor

HR7 Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor, and measures to contribute to the elimination of all forms of forced or compulsory labor.

See HR6 for more information on Ball Asia Pacific Ltd.

45

Indigenous Rights

HR9 Total number of incidents or violations involving rights of indigenous people and actions taken.

There were no incidents or violations involving the rights of indigenous people during 2010/2011.

Assessment

HR10 Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments

There were no incidents reported and no operations were subject to human rights reviews and/or impact assessments during 2010/2011.

Countries we operated in at the end of 2011:

1. Argentina
2. Brazil
3. Canada
4. China
5. Czech Republic
6. France
7. Germany
8. Netherlands
9. Poland
10. Serbia
11. United Kingdom
12. USA



SOCIETY

Disclosure on Management Approach

Please see www.ball.com/community in conjunction with the following GRI indicators.

Local Communities

46

SO1 Percentage of operations with implemented local community engagement, impact assessments, and development programs.

Ball takes a strategic approach to our charitable giving by supporting organizations that solve problems central to our company values and business strategy. In late 2010 we began our transition from corporate philanthropy to impact-driven community investment when we formed the Ball Foundation. Ball now directs the majority of its corporate giving in the U.S. through the foundation, and its creation is a key proof point to our commitment to sustainability, particularly the social aspect of the triple bottom line.

The Ball Foundation's mission is to provide financial support to not-for-profit organizations that sustain the communities in which we live and operate by improving and promoting education, recycling and community engagement.

The Ball Foundation's grants program provides grants to certain eligible, charitable organizations that meet the foundation's guidelines and are located in the U.S. The Ball Foundation focuses its grant making investments in organizations with measurable plans to improve communities where our associates live and work. To be considered for a grant, applicants must be tax-exempt, nonprofit organizations as defined under section 501(c)(3) of the Internal Revenue Code, or an accredited public or private school or university.

The Ball Foundation is linked to Ball's overall corporate strategy through directing our charitable giving targeting three areas: education, recycling and community engagement.

For more information, please see pages 26/27 in our 2010/2011 Sustainability Report.

SO9 Operations with significant potential or actual negative impacts on local communities.

In early 2012, we did not consider any of our operations to have significant or actual negative impacts on local communities.

SO10 Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.

See our answer to SO9.



Corruption

SO2 Percentage and total number of business units analyzed for risks related to corruption.

Ball Corporation regularly analyzes all of its business units, domestic and foreign, for risks related to corruption. Our U.S. units are scrutinized based upon a risk assessment plan developed and updated on an annual basis by our law and internal audit departments. Many units are also reviewed by a representative from internal audit on an annual basis. Our international units are regularly audited by internal audit and/or a third-party auditing firm, in order to seek compliance with the Foreign Corrupt Practices Act.

47

All new hires, domestic and foreign, receive a copy of Ball Corporation's Corporate Compliance Program Policy and the Ball *Business Ethics Booklet*. Over 4,700 designated employees also receive materials on these subjects prior to the end of each calendar year. The materials required for each of these individuals are distributed by Ball Corporation's computer systems, which send those materials to each appropriate person. Each person who receives the materials is required to certify that they have read, understood and will follow certain corporate policies which are intended to facilitate legal compliance. The employees who are required to recertify yearly are all managers and certain other employees for Ball and its United States affiliates and subsidiaries, as well as employees, outside North America who are specifically designated by the leadership of Ball's China, South American and European affiliates and subsidiaries. The total number of employees in all of Ball's operations that met this yearly requirement in 2011 was approximately 4,700 employees. The designated employees receive the latest *Business Ethics Booklet* with a memorandum each year, stating that all employees should familiarize themselves with the contents of the booklet and Ball Corporation's existing policies. These documents are also accessible on both Ball Corporation's internal website on the law department page, and on www.ball.com.

Ball Corporation's subsidiaries hold annual sales meetings. At these meetings, representatives from the law department give a detailed presentation on anticompetitive behavior, business ethics and other related issues.

SO3 Percentage of employees trained in organization's anticorruption policies and procedures.

Ball Corporation regularly provides updated materials to designated domestic and foreign employees regarding anticorruption policies and procedures. All employees, upon beginning their employment, are required to read, understand and follow Ball Corporation's compliance related policies and the Ball *Business Ethics Booklet*. Certain designated employees also receive materials on these subjects prior to the end of each calendar year. The materials required for each of these individuals are distributed by Ball Corporation's computer systems, which are electronically sent send these materials to the appropriate person. Each person that receives the materials is required to certify that they have read, understood and will follow certain corporate policies which are



intended to facilitate legal compliance. The employees who are required to recertify yearly are all managers and certain other employees for Ball and its United States affiliates and subsidiaries. The certifying individuals are specifically designated by the leadership of Ball's China, South American and European affiliates and subsidiaries. The total number of employees in all of Ball's operations that met this yearly requirement in 2011 was approximately 4,700 employees. The designated employees receive the latest *Business Ethics Booklet* with a memorandum each year, stating that all employees should familiarize themselves with the contents of the booklet and Ball Corporation's existing policies. These documents are also accessible on Ball Corporation's internal website on the law department page.

SO4 Actions taken in response to incidents of corruption.

Ball Corporation believes that compliance with anticorruption laws and policies is the responsibility of each employee, and we provide assistance in that regard. Ball Corporation has an existing "hotline" telephone number that employees are encouraged to call, anonymously if desired, with any issues that they perceive to be in violation of any laws or internal policies.

Public Policy

SO5 Public policy positions and participation in public policy development and lobbying. Describe public policy initiatives.

The top U.S. legislative and policy issues are:

- Create a More Competitive Tax Policy
- Education for Tomorrow
- Rational Regulation
- Advocate for a Fair Labor Policy

Ball regularly interacts with its elected representatives in the U.S. Congress, both members of the House of Representatives and the Senate, to advocate on behalf of government programs critical to our aerospace business as well as policy issues important to the overall corporation. The company participates in lobbying activities focused on bills and issues that specifically impact the company or corporation, and follows the processes and procedures required by law for reporting those activities.

Ball also participates in public policy development and lobbying through its memberships in various organizations such as the National Association of Manufacturers and the Can Manufacturers Institute. Further, our environmental health and safety department interacts with various regulatory boards and focuses on understanding and analyzing federal policies and budget trends that impact the company's programs and business operations. This is accomplished by interacting with both executive branch organizations and the Congress directly.



SO6 *Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.*

Ball Corporation has an existing political action committee that contributes financially to federal candidates in the United States. It operates in accordance with all applicable laws. In 2010 and 2011, the political action committee contributed \$102,900 and \$22,000 respectively.

49

Anti-Competitive Behavior

SO7 *Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes.*

Ball has not been involved in any legal actions within the reporting period, either domestically or internationally, involving anticompetitive behavior, antitrust or monopoly practices.

Compliance

SO8 *Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.*

During the reporting period, Ball has not had any material administrative or judicial fines or sanctions levied against it, either domestically or internationally, for noncompliance with laws and regulations, including, but not limited to, accounting fraud, workplace discrimination or corruption.



PRODUCT RESPONSIBILITY

Disclosure on Management Approach

Please see www.ball.com/recycling and www.ball.com/innovation1 in conjunction with the following GRI indicators.

Customer Health and Safety

50

PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement and percentage of significant products and services categories subject to such procedures.

Ball strictly adheres to procedures and test protocols for materials used to manufacture our containers to ensure the health and safety of consumers.

Depending on markets served, regulatory compliance documents and data certifying that our production raw materials meet or exceed, as applicable, U.S. Food and Drug Administration (FDA) regulations, the European Union's health and consumer protection laws, General Administration of Quality Supervision, Inspection and Quarantine of the Peoples Republic China regulations and Health Canada standards are required before production materials are received for use.

In order to utilize the correct materials necessary to protect the public and to preserve the integrity and safety of the product being packaged, the composition of food containers and beverage containers are carefully and continually studied to ensure we understand our customers' requirements.

Before the product is put into the general public market, selective organoleptic (sensory) testing and shelf life studies are performed by Ball.

During commercial production, testing is ongoing to verify containers meet end use specifications.

PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.

Ball has not had any incidents of such noncompliance within the reporting period, either domestically or internationally.



Product and Service Labeling

PR3 Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements.

None of the products Ball makes are sold directly to the general public by Ball. Our packaging products are sold to consumer and household goods companies who determine product information and labeling for the end user. Ball Aerospace supplies advanced-technology products and services for governmental and commercial customers.

PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling, by type of outcomes.

Ball has not had any incidents of such noncompliance within the reporting period, either domestically or internationally.

PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.

Please see www.ball.com/stakeholder-engagement.

Marketing Communications

PR6 Programs for adherence to laws, standards and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.

Ball does not have any existing programs for adherence to laws, standards, and voluntary codes that relate specifically to marketing communications. However, every new domestic and international employee is required to certify that they have read, understood, and will follow the information reflected in Ball Corporation's *Business Ethics Booklet*. All employees are regularly supplied with an updated version of this booklet. Further, managers and certain other employees are required to electronically certify compliance with these and other compliance-related guidelines every year.

PR7 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotions, and sponsorship by type of outcomes.

Ball has not had any incidents of noncompliance during the reporting period with respect to regulations and voluntary codes concerning marketing communications, including advertising, promotion and sponsorship, either domestically or internationally.



Customer Privacy

PR8 *Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data. Describe measures to safeguard customer data.*

Ball has not received any substantiated complaints during the reporting period regarding a breach of customer privacy or the loss of customer data, either domestically or internationally. To the extent necessary, Ball will work with customers to execute appropriate confidentiality agreements to protect customer and internal corporate data. Additionally, Ball Packaging Europe has a comprehensive security policy in place.

52

Compliance

PR9 **Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. General description of actions related to compliance with laws/regulatory requirements.**

Ball has not incurred any significant administrative or judicial fines within the reporting period, either domestically or internationally, for failure to comply with laws or regulations concerning the provision and use of our products and services.

At Ball domestically, all appropriate departments, including, but not limited to, law, internal audit, credit and tax, work together to seek to ensure final products released by Ball Corporation comply with all applicable laws. Similarly, at international operations in Europe, Asia and South America various departments, such as legal, controlling, internal audit, human resources, accounting, and tax, including a network of local consultants, work together in order to seek to maintain compliance with the law from planning to execution of all business activities.