



Policy

Ball Corporation
"Proprietary and Confidential"
Internal Use Only*

Section:	Compliance and Regulatory CP-03.025.001	Effective Date:	07/30/2020
Subject:	Conflict Minerals	Supersedes:	05/07/2014
Countries:	Global		

Scope: This information on Conflict Minerals applies to Ball Corporation, its divisions, operations, subsidiaries, affiliates, or greater than 50 percent owned joint ventures ("Ball"), and all employees, officers and directors of Ball.

Policy: For purposes of this Policy, the term "employees" includes all permanent, contract, and temporary agency employees who are on long-term assignments with Ball as well as to consultants to Ball.

The primary purposes of this policy are to maintain Ball's commitment to the highest ethical standards, foster positive community relations, act with respect for individuals affected by the mining and armed groups involved in the smelting of conflict minerals in the DRC region, and ensure Ball complies with all applicable laws related to Conflict Minerals, including Section 1502 of the Dodd-Frank Act ("Section 1502") of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Act").

As part of Ball's efforts to comply with applicable law and eradicate modern slavery and forced labor from its supply chain, Ball seeks to avoid purchasing goods or materials for use in our products that contain, or require for their production, any Conflict Minerals originating from the Democratic Republic of the Congo ("DRC") or adjoining countries where the mining of such Conflict Minerals benefits armed groups in the covered countries.

Ball supports ending violence and human rights violations in the mining of certain minerals from locations in DRC and adjoining countries. Ball also complies with and supports compliance with Section 1502, which aims to prevent the use of Conflict Minerals that directly or indirectly finance or benefit armed groups in the DRC or adjoining countries (as defined in the Act). Companies, such as Ball, that file reports with the SEC must comply with Section 1502 if any Conflict Minerals are necessary to the functionality or production of a product manufactured or to be manufactured by the company.

"Conflict Minerals" is the term used to describe the following minerals: gold, wolframite, cassiterite, columbite-tantalite and their derivative metals, which include tin, tungsten and tantalum – no matter where they are mined or smelted. For example, gold mined in Canada is considered a "Conflict Mineral" under federal law even though it does not originate in a DRC Region (as defined in Section 1502). Fully recycled metals (scrap metals) are exempt.

Procedure: Ball annually conducts a "reasonable country of origin inquiry" ("RCOI") of our supply chain to determine which mines and smelters any Conflict Minerals originate from, and thereafter files a Form SD and Conflict Minerals Report ("CMR") with the SEC disclosing our findings.

Our detailed procedure can be found by accessing Ball.com. This procedure includes:

- (i) Conducting a due diligence program based on the Organization for Economic Co-operation and Development's ("OECD") Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas Framework, and the related Supplements for gold, tin, tantalum and tungsten (the "OECD Guidance").

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- (ii) Utilizing the Responsible Business Alliance's ("RBA") conflict mineral reporting template to obtain sourcing information from our direct suppliers and continually engaging our suppliers through follow-ups to improve response quality.
 - (iii) Determining whether the smelters disclosed by our suppliers are certified as conflict free by using the Responsible Minerals Assurance Process ("RMAP") website and our third party compliance advisor database.
 - (iv) Disclosing the results of our findings both on our public website and with the SEC.

Ball continues to evaluate its relationships with its suppliers. We review their compliance with our information requests and whether their sources have been audited and are "conflict free". Suppliers who do not comply with this policy or who are shown to source their minerals from the DRC or adjoining countries and who cannot evidence that such minerals are "DRC Conflict Free" (as defined in Section 1502) may be denied future business by Ball.

Additionally, Ball has adopted supplier guiding principles (the "Supplier Guiding Principles"), which are included as an exhibit to our form supplier agreements. The Supplier Guiding Principles, among other things, state our expectation that our suppliers will maintain ethical business practices, including compliance with laws related to human rights. We include a Conflict Minerals certification as part of our form supplier agreements.

Any questions regarding this Policy or the applicable procedures or requirements set forth above should be directed to Ball's Law Department or the Compliance Alliance Team.

Approved By: _____
Charles Baker
Vice President and General Counsel