



Ball Corporation

Global Supplier Code of Conduct



INTRODUCTION

At Ball Corporation, we believe that our commitment to Uncompromising Integrity defines the way we conduct business, at every level of our global organization and in every region. We are proud of the work our people do daily to maintain our culture of compliance, which safeguards the time and energy we collectively invest in our company.

With a legacy dating back to 1880, built upon the principles of trust and integrity, we maintain an ongoing dedication to serving the needs of our customers, partners, and global communities in the most ethical ways. As we continue to chart the course ahead, it is increasingly important that we move forward in the right ways.

The Global Supplier Code of Conduct outlines Ball's ethical conduct expectations for any third party that conducts business with Ball including, but not limited to, our suppliers, distributors, contractors, and agents, as well as their respective employees (our "Supply Chain Partners"). This document is consistent with Ball's Business Ethics Code of Conduct. The Supplier Code does not supersede any more specific provision in a particular contract and, to the extent there is any inconsistency between this Code and any other provision of a particular contract, specific provisions in the contract will control.

We expect our Supply Chain Partners to take reasonable steps to communicate these expectations throughout their organization and supply chain so that the standards and expectations in this Supplier Code are upheld. In particular, this Global Supplier Code of Conduct should be made available to all employees and subcontractors who work on Ball business



BUILD A SUSTAINABLE FUTURE



DOING THE RIGHT THING

BRIBERY AND CORRUPTION

Honest dealing among business partners is essential to sound business relationships. Ball seeks to give fair and equal consideration to all potential and existing Supply Chain Partners, and to base our decisions on objective criteria such as price, quality, and service capability as well as reliability and integrity. We expect our Supply Chain Partners to demonstrate the same high ethical standards and to conduct all business transactions with integrity and fairness. Supply Chain Partners must comply with all applicable bribery and corruption laws, including the FCPA, UKBA, as well as applicable laws governing lobbying, gifts, donations, hiring, payments to public officials, and anti-money laundering. We expect our Supply Chain Partners to extend no personal favors on prices, promotional allowances, marketing assistance, or provide anything of value to retain business or obtain any business advantage. When conducting business with Ball, giving or receiving any kickbacks, bribes, or similar improper benefits of any sort is prohibited – including “facilitation payments” given to government officials or any other third party to help facilitate or speed up a routine process.

COMPLIANCE WITH ECONOMIC AND TRADE SANCTIONS

Ball’s Supply Chain Partners are required to comply with applicable trade and import regulations. When working on Ball business, Supply Chain Partners are also required to comply with U.S. trade regulations when applicable. Specifically, these regulations require that business may not be conducted on Ball’s behalf with any persons, entities, or countries in contravention of U.S. sanctions or embargoes. Additionally, our Supply Chain Partners are required to comply with sanctions imposed by other countries and entities, including, but not limited to, the United Nations, European Union, and the United Kingdom. In connection with Ball business, when our Supply Chain partners are supplying directly or indirectly to the U.S. business, they are also prohibited from participating in boycotts that are not sanctioned by the U.S. government.

FREEDOM OF ASSOCIATION

Supply Chain partners are expected to permit employees to associate freely, bargain collectively, and seek representation in accordance with laws and regulations. This includes permitting employees to openly communicate and share grievances with management about working conditions without fear of reprisal or harassment.

FAIR COMPETITION

Ball expects all Supply Chain Partners to conduct their business in full compliance with applicable competition laws. These laws are intended to promote free and fair competition in order to benefit consumers. Prohibited actions include, but are not limited to, abuse of a dominant market position as well as any agreements or understandings among commercial parties that affect prices, and may also include the following:

- Price fixing
- Market allocation
- Group boycotts
- No-poach and wage fixing
- Resale price maintenance
- Unlawful discrimination on prices or restrictions on trade
- Exchange sensitive information

REPORTING COMPLIANCE CONCERNS

Ball expects Supply Chain Partners to establish effective mechanisms to receive and respond to concerns related to the topics discussed in this Supplier Code. Supply Chain Partners are expected to have non-retaliation policies and procedures in place to protect employees from retaliation as a result of raising a concern in good faith. Supply Chain Partners must take reasonable steps to cooperate in Ball’s investigations.

Employees of Supply Chain Partners may direct concerns regarding the expectations in this Supplier Code to Ball’s Compliance Alliance Hotline. The hotline is run by an independent third party and is available 24 hours a day, seven days a week. Visit ballcompliancehotline.com to submit a report online and to access local toll-free numbers

RESPECTING EACH OTHER

Ball understands the importance of its role in a global society and has a long-standing commitment to respecting human rights. We expect our Supply Chain Partners to provide an equitable and safe work environment and to adhere to the principles set out in this section.

HUMAN RIGHTS

Ball is committed to upholding the human rights of employees and treating them with dignity and respect. We expect our Supply Chain Partners to share the same respect for human rights, including those principles recognized in the Universal Declaration of Human Rights, the United Nations Global Compact, and as required by applicable law. Our Supply Chain Partners should be familiar with the United Nations' Guiding Principles on Business and Human Rights and should exercise due diligence to identify, prevent, mitigate, and address actual or potential adverse human rights impacts through their activities.

DIVERSITY, EQUITY AND INCLUSION

Ball is committed to promoting an inclusive workplace environment that unlocks the unique qualities, values, and potential of each employee. We expect our Supply Chain Partners to create an inclusive environment that fosters diverse perspectives and experiences. In addition, we expect all Supply Chain Partners to actively work to develop and retain a diverse and inclusive workforce and be committed to diversity with respect to their own suppliers.

NO DISCRIMINATION

Supply Chain Partners are required to maintain an inclusive work environment that attracts and retains a talented and diverse workforce. To ensure our success in establishing a positive work environment, Supply Chain Partners are expected to provide and foster a diverse, equitable, and inclusive workplace. This includes prohibiting discrimination of any kind related to a person's race, ethnicity, color, creed, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability, genetic information, veteran status, or any other characteristic protected by either applicable legal requirements or specific corporate policy.

PREVENTING SUBSTANCE ABUSE

Ball expects Supply Chain Partners to be fully alert and able to perform their job responsibilities. While on Ball premises or conducting business for or in relation to Ball, Supply Chain Partners are expected not to use or be impaired by the use of alcohol, illegal substances, or anything that could impair their judgment.

COMPLYING WITH WAGE AND CHILD LABOR LAWS

Ball promotes a "zero-tolerance" standard for the use of child or forced labor or for human trafficking practices, and we have the same expectations of businesses conducted by our Supply Chain Partners. Supply Chain Partners are required to conduct business in a manner consistent with applicable employment and human rights laws and regulations. Among other things, we expect our Supply Chain Partners to commit to comply with legal working age, wage, and hour laws and ensure that any forms of slavery and human trafficking are not present in their supply chains and businesses.

HARASSMENT, VIOLENCE, AND WEAPONS IN THE WORKPLACE

Ball is committed to maintaining a safe work environment that is free from violence and threatening behavior. We expect our Supply Chain Partners to prohibit hostile or abusive behavior, threats or acts of violence, and the possession of prohibited weapons inside their facilities or during company activities as proscribed by law. Ball expects that the employees of Supply Chain Partners are treated with dignity and respect and are not subject to any form of unethical treatment, threats of violence, or other forms of physical, mental, or sexual harassment.

BALL REQUIRES ITS SUPPLY CHAIN PARTNERS TO:

Comply with the UK Modern Slavery Act of 2015, the California Transparency in Supply Chains Act of 2010, the Uyghur Forced Labor Prevention Act of 2021, and other similar laws where applicable. Ball's statement on compliance with such laws is available [here](#). Ball also requires all Supply Chain Partners to certify their compliance with the California Transparency in Supply Chains Act. Comply with its policy on Conflict Minerals. Ball also requires all Supply Chain Partners to provide relevant documentation that demonstrates compliance with Ball's conflict minerals certification.

Comply with the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and other similar human rights, labor, environment and anti-corruption laws encompassed in the Ten Principles of the United Nations Global Compact. Ball is committed to making these standards part of our strategy, culture and day-to-day operations.

SUSTAINABILITY AND SUPPLY CHAIN

PRODUCT QUALITY

Throughout Ball's different divisions, our long-term success is based on producing high-quality products. Supply Chain Partners are expected to have quality assurance processes to deliver a product whose quality meets or exceeds Ball's requirements. Ball will only do business with Supply Chain Partners that produce, package, store, ship, or otherwise handle product in accordance with the good manufacturing, distribution, and professional service practices prevailing in their respective industries. Supply Chain Partners have a responsibility to know the origins of all parts and materials, and to ensure their authenticity and quality standards.

CONTINUOUS IMPROVEMENT

The provisions set forth in this Supplier Code provide the minimum standards expected of Supply Chain Partners. Ball expects Supply Chain Partners to strive to exceed best industry practices. Ball encourages and recommends Supply Chain Partners to: continuously improve their products and/or services, maintain accurate supply chain records, identify and implement action plans for reducing negative environmental impacts, and commit to continuous improvement on sustainability issues.

SUPPLY CHAIN MANAGEMENT

Supply Chain Partners should establish management systems to continually monitor and address workplace conditions, including the establishment and regular review of policies, practices, and personnel. Ball expects its Supply Chain Partners to maintain and make accessible all documentation that may be needed to demonstrate compliance with this Supplier Code and ensure that such documentation is accurate, current, and complete.

COMMITMENT TO THE COMMUNITY

Supply Chain Partners must be able to demonstrate commitment to their communities by engaging with them in a responsible manner and building relationships that promote the economic, social, and environmental development of these communities.

ENVIRONMENTAL, HEALTH, AND SAFETY

Ball strives to be a leader in environmental accountability and health and safety at work is one of our priorities. Supply Chain Partners are expected to integrate health and safety management requirements into business processes. Non-compliant practices or conditions must be corrected to provide a safe work environment in compliance with applicable laws and regulations, and policies must be implemented to minimize accidents and injuries.

In line with the high value that Ball takes on the protection of our environment and the preservation of Earth's finite resources, including minimizing the environmental risks associated with the impact of air emissions and the usage and management of energy, water, and waste from operations, we expect our Supply Chain Partners to comply strictly with the letter and spirit of applicable environmental laws and regulations and develop and implement plans to correct any non-compliance practices or conditions. .

When applicable, Supply Chain Partners should commit to operating in an environmentally responsible manner, including reducing, measuring, and reporting on their environmental impact to mitigate environmental, social, and governance (ESG) risks related to supply chains and operations.

PROTECTING BALL

Supply Chain Partners are responsible for safeguarding Ball's confidential information and intellectual assets and must maintain physical and electronic security for all sensitive information. Supply Chain Partners' employees should use extreme care in protecting all types of sensitive information.

DATA PRIVACY AND USE OF INFORMATION

Ball is committed to protecting the personal information of all individuals who work with us. This includes protecting the personal information of employees, contractors, customers, vendors, and visitors. Supply Chain Partners must protect all information and data received from and while doing business with Ball in accordance with recognized security practices, contractual obligations, and applicable laws. Such information and data must always be kept confidential and may not be used for any purposes other than the business purpose for which it was provided or made available. In addition, information obtained from Ball, or about Ball employees, customers, suppliers, consumers, and other Supply Chain Partners, should only be collected, processed, used, stored, and retained as necessary and in compliance with all applicable data privacy and data protection laws.

If a Supply Chain Partner collects, processes, uses, stores, or retains personal or proprietary information at Ball's request or on Ball's behalf, such Supply Chain Partner will be required to agree to certain contractual obligations with Ball to ensure that it complies with Ball's standards and applicable laws regarding the protection of such personal information. Supply Chain Partners who have been given access to Ball's confidential or proprietary information as part of the business relationship should not share this information with anyone unless authorized to do so by Ball.

Supply Chain Partners may not disclose Ball's confidential or proprietary information to persons outside of their organizations, nor may they disclose such information within their own organizations except on a strict "need to know" or "need to use" basis for the purpose intended by Ball.

Please refer to our [Terms of Use and Privacy Policies](#) for additional information.

CONFLICTS OF INTEREST

At Ball, we are transparent in our business dealings and avoid situations that are conflicting, biased, or detrimental to the best interests and reputation of Ball. In business transactions and relationships involving Ball, Supply Chain Partners are required to remain free of any improper influences that stem from personal,

business, or other arrangements that could create an actual or perceived conflict of interest. Any potential conflicts must be promptly disclosed to Ball and vetted before conducting or continuing to conduct business with Ball.

GIFTS AND GRATUITIES

Ball employees are prohibited from giving or receiving gifts, payments, or other benefits or items of value that could influence, or appear to influence, any business decision. We ask our Supply Chain Partners to respect this policy and refrain from offering any Ball employee (or any family member of a Ball employee) a gift or other benefit that is more than nominal in value. Ordinary business meals and small tokens of appreciation are generally fine, but Supply Chain Partners should avoid offering Ball employees travel, frequent meals, or expensive gifts. Gifts of cash or cash equivalents, such as gift cards, are never allowed.

INSIDER TRADING

Ball employees and others associated with the company often have access to material, non-public information (commonly called "insider information") about Ball or other companies with which we conduct business. Such information might be shared with our Supply Chain Partners in the course of doing business with Ball. Supply Chain Partners cannot use or share Ball insider information for the purpose of trading in Ball or other securities or encourage others to do so. Insider information includes material nonpublic information about matters such as significant contracts, claims, liabilities, major litigation, potential sales, mergers or acquisitions, development plans, activities, earnings, forecasts, and budgets.

TAX COMPLIANCE

Ball takes a "zero-tolerance" approach to tax evasion or the facilitation of tax evasion by another person or entity. Supply Chain Partners are required to have in place reasonable processes to comply with the U.K. Criminal Finances Act of 2017 and other applicable laws to prevent any activity, practice, or conduct that could constitute a tax evasion facilitation offense or a foreign tax evasion facilitation.

LEGAL COMPLIANCE

Supply Chain Partners must comply with all applicable laws, rules, regulations, and orders of all relevant government bodies in the performance of their businesses.

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