



SECTION:	Corporate Compliance GP-Comp.030.001	EFFECTIVE DATE	01/01/2024
SUBJECT:	Land and Property	SUPERSEDES:	5/25/2020
SCOPE:	Global		

SCOPE/APPLICABILITY

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

Ball seeks to recognize and respect all legitimate land tenure rights. Ball is committed to adhering to the legal requirements relating to the acquisition of land in each country in which we are operating.

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 legitimate property rights and ensure Ball complies with all applicable laws during the acquisition of any land.

“Legitimate” rights include all rights related to land , rather than only “legal” rights.

This broader definition is intended to cover land in which a country may not confer legal rights to a person or persons but such person or persons nonetheless have legitimate rights in such land.

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.

PROCEDURE

When possible, Ball will utilize the International Finance Corporation (IFC) Performance Standards in land acquisitions (including leasing and utilization). The IFC Performance standards can be summarized as:

- I. Free.** Consent to the sale of land is given voluntarily and absent of “coercion, intimidation or manipulation”.
- II. Prior.** Consent is sought sufficiently in advance of any authorization or commencement of activities from an existing land owner.
- III. Informed.** Ensure that information is provided prior to seeking consent to acquire and that information is provided as the acquisition process proceeds.
- IV. Consent.** Refer to the collective decision made by the land rights-holders and reached through the customary decision-making processes of the affected peoples or communities.

If Ball is operating in a country in which it determines the IFC Performance Standards are unable to be met, Ball will support efforts to encourage such national governments to support and follow the IFC Performance Standards.

Copies Are Uncontrolled—Always go to the BallPortal for the latest version.

*The information contained herein is the private property of Ball Corporation that is intended for internal use only. It may not be disclosed externally without specific management approval. If disclosed outside Ball Corporation by special arrangement, it may not be used, in whole or in part, by the recipient, except for the limited purposes for which it has been furnished, and it may not be distributed or reproduced, in whole or in part. This information is exempt from public disclosure under 5 U.S.C. 552(b)(4), and its use by government personnel is subject to the restrictions imposed by 18 U.S.C. 1905.





Approved By:

Dan Fisher

Chief Executive Officer

Review History

Review Date	Reviewed By	Last Change Summary
01/01/2024	EHR	Updated to New Template

Copies Are Uncontrolled—Always go to the BallPortal for the latest version.

