



SECTION:	Corporate Compliance GP-Comp.001.002	EFFECTIVE DATE	01/01/2024
SUBJECT:	Corporate Compliance	SUPERSEDES:	12/31/2002
SCOPE:	Global		

PURPOSE

The purpose of a this policy is to ensure that a company and its employees adhere to laws, regulations, and ethical standards relevant to their operations. It helps mitigate risks, maintain a positive reputation, and foster a culture of integrity and accountability within the organization.

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

It is the policy of the company to comply with all laws, including federal and state "Laws", as well as with our Board of Directors' Policy Statements, which govern the conduct of domestic and international business. The responsibility for such compliance rests with the operating units, staff departments, and all individual employees of the company.

It is the policy of the company to facilitate employee reporting within the company of conduct which the employee reasonably believes constitutes a violation of any Laws or our Policy Statement.

It is the policy of the company to not discharge, threaten, retaliate, or discriminate against any employee in terms or conditions of employment because the employee lawfully provides truthful information to law enforcement officials.

It is the policy of the company to cooperate in good faith with lawful investigations of violations of law by law enforcement officials.

PROCEDURE

Corporate Compliance Program

The focus of the Corporate Compliance Program shall be to minimize risks in those areas where the company and/or its individual officers, directors or employees may be exposed to criminal or serious civil liability.

Corporate Compliance Committee

- The Committee shall administer the Corporate Compliance Program designed to publicize the need for and facilitate compliance with the company's legal and ethical responsibilities.
- The Committee shall formulate and review compliance policies and procedures and assist and advise business units and staff departments with training, audits, and support, and shall provide periodic reports to senior management on the status of compliance within the company.
- The Committee shall be chaired by the Corporate Compliance Officer and will include representatives of the business segments, the Law Department, Internal Audit Department and other departments as appropriate for the topic at hand.

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- The Committee shall be responsible to the Chief Executive Officer, with the objective of better enabling the company to meet its legal and ethical compliance obligations.

Hotlines

The company will maintain one or more hotlines for the receipt of reports concerning possible violations of any Laws or our Policy Statements. Examples include environmental or workplace safety violations; employment discrimination, harassment or hostile workplace incidents; possible labor mischarging on government contracts; and misappropriation of trade secrets or intellectual property rights of third parties, such as copyright infringement or software piracy.

Also, the Sarbanes-Oxley Act of 2002 requires the company to maintain the hotline(s) for the receipt of employee reporting of accounting, internal accounting controls, or auditing matters which the employee reasonably believes constitutes a violation of any federal law relating to fraud against shareholders of the company or any rule or regulation of the Securities and Exchange Commission ("SEC").

Neither the company nor any officer, employee, contractor, subcontractor, or agent of the company will discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any employee in the terms and conditions of employment because of any lawful act done by the employee to provide information, cause information to be provided, or otherwise assist in any investigation regarding any conduct which the employee reasonably believes constitutes a violation of any state or federal law relating to fraud against shareholders of the company or any SEC rule or regulation, or to file, cause to be filed, testify, participate in, or otherwise assist in a proceeding filed or about to be filed relating to an alleged violation of any such laws or rules.

Approved By:

Dan Fisher

Chief Executive Officer

Review History

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



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