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| Section: | Corporate Compliance GP-03.012.003 | Effective Date: | 06/01/2021 |
| Subject: | Human Rights | Supersedes: | 02/03/2014 |
| Countries: | Global | | |

Scope: This information on Human Rights applies to Ball Corporation, its divisions, operations, subsidiaries, or greater than 50 percent owned joint ventures ("Ball").

Policy: This policy sets out the principles for our actions and behaviors in relation to human rights. We are proud of our rich history of delivering value to all of our stakeholders through our core values of uncompromising integrity, being close to our customers, behaving like owners, focusing on attention to detail and being innovative. Respect for human rights is a basic tenant of Ball's beliefs and is consistent with our values and our goal to be a more economically, socially and environmentally sustainable enterprise. Our Human Rights Policy is aimed at supporting and guiding our management and employees to achieve our goals.

Introduction: At Ball, we understand the increasing importance of the role of an international company in a global society. To ensure that we meet the responsibilities of this role, it is necessary to foster and maintain a responsible and safe work environment for our employees. As a result, Ball has developed this Human Rights Policy with regard to the basic human rights that we aim to respect and safeguard.

Ball endorses the principles set out in the Universal Declaration of Human Rights and the International Labour Organization ("ILO") based on respect for the dignity of the individual without distinction of any kind. Ball supports these human rights and employees' rights in line with the legitimate role of business.

Commitments to our Stakeholders:

1. **Employees:** At Ball, we are committed to respect the human rights of our employees. We develop our worldwide employment policies with the aim of compliance with the relevant aspects of international human rights declarations. We are committed to train our employees to be aware of, respect and protect human rights in the workplace and in the local communities directly impacted by our operations.
 - a. **Promoting Health and Safety:** In accordance with Ball's Environmental, Health and Safety Policy (CP-03.013.XXX), we are committed to the health, safety and well-being of our employees. Ball is committed to work towards a long term vision of zero accidents.
 - b. **Promoting Freedom of Association and the Right to Collective Bargaining:** Ball respects freedom of association and our employees' right to collectively bargaining. We work with our subcontractors and suppliers to ensure they do the same.
 - c. **Prohibiting Child, Forced or Compulsory Labor:** Ball opposes the use of forced or compulsory labor in accordance with our Child and Forced Labor Policy (CP-03.011.XXX). We will adhere to all regulations and laws related to forced or compulsory labor. We also work with our subcontractors and suppliers to ensure they do the same.

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- d. **Prohibiting Unlawful Discrimination in the Workplace:** Ball is committed to ensuring that each employee and applicant is treated with fairness and dignity. In accordance with Ball's Corporate Compliance Policy (CP.03.001.XXX), we will facilitate employee reporting within Ball of conduct that the employee reasonably believes constitutes a violation of any laws or our Policy. Ball will continue its dedicated hotline for receipt of such reports. In accordance with Ball's Equal Employment Opportunity and Affirmative Action Policy (CP-02.004.XXX) and Ball's Prohibition of Discrimination, Harassment, and Retaliation Policy (CP-02.016.XXX), any unlawful discriminatory practice based on race, ethnicity, color, creed, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability, or veteran status, or other characteristics protected by applicable federal, state or local law will not be tolerated. Ball seeks to provide each employee with equal opportunity for advancement without discrimination.
 - e. **Prohibiting Harassment and Violence:** Ball is committed to promote a work environment free of any form of harassment, exploitation, abuse or violence as defined by the laws of each country in which we operate and as established by Ball's Equal Employment Opportunity and Affirmative Action Policy (CP-02.004.XXX), Ball's Prohibition of Discrimination, Harassment, and Retaliation Policy (CP-02.016.XXX) and Ball's Workplace Threats and Violence Policy (CP-03.006.XXX).
 - f. **Providing Competitive Compensation and Remuneration:** Ball seeks to pay competitive wages based on local market assessment and, at a minimum, in accordance with local laws and regulations.
 - g. **Upholding Conditions of Employment:** Ball complies with all laws regarding conditions of employment including basic and overtime working hours and will abide by agreements negotiated with our employee representatives and trade unions in accordance with Ball's Corporate Compliance Policy (CP.03.001.XXX).
 - h. **Ensuring Legal Compliance:** At a minimum, Ball will comply with applicable local, state and national laws regarding human rights and workers' rights in the locations where the company does business.
 - i. **Providing a safe and healthy work environment for Ball's Independent Contractors and Temporary Workers:** Ball is committed to promote a work environment free of any form of harassment, discrimination exploitation, abuse or violence as defined by the laws of each country in which we operate and as established by Ball's Equal Employment Opportunity and Affirmative Action Policy (CP-02.004.XXX), Ball's Prohibition of Discrimination, Harassment, and Retaliation Policy (CP-02.016.XXX) and Ball's Workplace Threats and Violence Policy (CP-03.006.XXX).

Ball recognizes its workers, including foreign and domestic migrant workers, are provided wages, benefits and working conditions in accordance with our established standards and applicable law.
 - j. **Providing Competitive Benefits:** Benefits vary by country and are driven by market practices, legal requirements, and internal global standards. Common benefits in all localities include but are not limited to paid time off, various leaves of absence, competitive compensation programs, and others.
 - k. **Ensuring Diversity and Inclusion:** Ball is committed to imbedding Diversity and Inclusion (D&I) through partnering, education and engaging employees. We partner closely with our business leaders to develop and implement strategies that advance our D&I commitments. Ball utilizes a "Think, Speak and Meet Inclusively" training module, which helps Ball employees learn techniques for communicating in a way that opens minds and allows for a better understanding of personal biases and behaviors. In addition, our Ball Resource Groups play a pivotal role in providing opportunities for our employees to participate in programs designed to strengthen our culture of belonging.



- I. **Prohibiting Use of Prison Labor:** Ball opposes the use of prison labor within its own operations and suppliers' operations. We also work with our subcontractors and suppliers to ensure they do the same.

2. **Business Partners:** Beyond our own operations, Ball seeks to avoid even indirect involvement in human rights abuses. We are working on identifying where in the value chain of our products adverse human rights impacts from human trafficking and Conflict Minerals may occur. We seek to respect and promote human rights when engaging with subcontractors, suppliers, customers, joint venture and other partners. We will do this, as appropriate, through proactive engagement, monitoring and contractual provisions.
 - a. **Upholding Human Rights in the Value Chain:** All business partners are responsible for supporting human rights in the work environment. It is every partner's responsibility to meet Ball's standards and ethical expectations, which includes striving for internationally accepted labor standards and a zero tolerance policy towards the application of child labor.

 - b. **Communicating Supplier Guiding Principles:** Ball's Supplier Guiding Principles set forth the business conduct standards to which Ball expects its suppliers to adhere. The principles are provided to suppliers negotiating agreements with Ball, its subsidiaries and affiliates worldwide. These principles are an important way in which Ball communicates its environmental and social concerns to its suppliers.

 - c. **Preventing Slavery and Human Trafficking:** Ball negotiates agreements with its direct suppliers in which the suppliers certify that the supplier complies with all applicable laws and regulations, including those relating to the prohibition of forced labor and human trafficking.

 - d. **Avoiding the Use of Conflict Minerals:** "Conflict minerals" are certain minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or surrounding countries. Ball is requesting certifications from its suppliers that products sold to Ball that are incorporated into Ball's products either do not contain these minerals, or that, if these minerals are part of the supplied product, they originate from non-conflict areas or were provided by a conflict-free smelter.

3. **Local Communities:** We seek to respect human rights and to develop an understanding of the cultures, customs and values that prevail in our local communities by developing an inclusive and open dialogue with the people affected by our business during normal operations, during acquisitions and mergers and during any divestitures or facility closures.
 - a. **Avoiding Involuntary Resettlements:** Ball seeks to avoid involuntary resettlements. In situations where it is unavoidable, we commit to comply with the national government's or regional authorities' guidelines on resettlement and rehabilitation and also act in line with international human rights norms on this subject.

 - b. **Respecting Indigenous Peoples' Rights:** Ball respects the rights of Indigenous peoples as defined by applicable national and emerging international standards.

 - c. **Adopting Proportionate Security Arrangements:** Ball strives to ensure that the provision of security to our operations and our engagement with public and private security forces is consistent with the laws of the relevant country and relevant international standards and guidelines. We will adapt our security arrangements to balance the need for safety while respecting human rights.



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- d. **Developing Practices for Land and Water Use:** Ball works toward understanding and applying sound practices for land and water use consistent with emerging international practices while respecting human rights in accordance with Ball's Environmental Health and Safety Policy (CP-03.013.XXX) and Ball's Land and Property Policy (CP-03.030.XXX).

Training and Communications: Ball will communicate this policy and relevant guidance to employees through our established internal communication channels. Ball employees shall have access to Ball's applicable Corporate Policies. We will communicate this policy to our suppliers, contractors and business partners and other stakeholders. Managers, employees and agents will receive relevant training on how to implement this policy in the scope of their employment.

Raising Concerns and Seeking Guidance: In accordance with Ball's Corporate Compliance Policy (CP.03.001.XXX), compliance hotlines have been established through which employees can anonymously report compliance concerns. Pursuant to Ball's Prohibition of Discrimination, Harassment and Retaliation Policy (CP-02.016.XXX), we will not tolerate unlawful retaliation in the workplace for use of the hotline.

Monitoring and Review: Ball will review periodically the Human Rights Policy and our implementation with respect to its suitability and effectiveness.

Non-Complicity in Human Rights Violations: Ball recognizes that in countries that are politically less stable or where human rights are compromised dilemmas may arise, including whether or how it can continue to operate in that country with integrity, Ball will act in such a way that none of its operations knowingly contribute to human rights violations by others.

Approved

John Hayes
Chairman, President and Chief Executive Officer

Associated Documents

Environmental Health and Safety Policy (CP-03.013.XXX)
Child and Forced Labor Policy (CP-03.011.XXX)
Corporate Compliance Policy (CP.03.001.XXX)
Equal Employment Opportunity and Affirmative Action Policy (CP-02.004.XXX)
Land and Property (CP-03.030.XXX)
Prohibition of Discrimination, Harassment and Retaliation Policy (CP-02.016.XXX)
Workplace Threats and Violence Policy (CP-03.006.XXX)