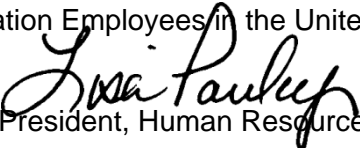




Memorandum

February 28, 2018

TO: Ball Corporation Employees in the United States

FROM: Lisa Pauley 
Senior Vice President, Human Resources & Administration

SUBJECT: Prohibition of Discrimination, Harassment, and Retaliation

The purpose of this communication is to reaffirm the company's position prohibiting workplace discrimination and harassment on the basis of race, ethnicity, color, creed, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, political affiliation or preference, disability, genetic information, veteran status, or any other characteristic protected by applicable federal, state or local law, as well as prohibiting any retaliation against an individual who brings a good faith complaint of discrimination or harassment to the attention of the Company. Not only is such discrimination and harassment a violation of Company policy, it may also be a violation of Title VII of the Civil Rights Act, the Age Discrimination in Employment Act, or the Americans with Disabilities Act, as well as similar federal, state or local laws.

Because of its unique nature, sexual harassment is of particular concern. Sexual harassment may include sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature may constitute sexual harassment when:

- Submission to them is either an explicit or implicit term or condition of employment;
- Submission or rejection is used as a basis for employment decisions;
- The conduct substantially interferes with an individual's work performance; or
- The conduct creates an intimidating, hostile, or offensive working environment.

Conduct similar to the conduct listed above, but based on any other protected characteristic (i.e., race, ethnicity, color, creed, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, political affiliation or preference, disability, or veteran status) also may constitute prohibited discrimination or harassment. We prohibit discrimination and harassment based on these characteristics and any others that are protected by applicable law.

If you feel you are being discriminated against or harassed, are aware of or suspect the occurrence of discrimination or harassment, or want counseling on coping with potential discrimination or harassment, you should immediately contact your supervisor, Human Resources representative, or any member of management. In all cases, the matter will be investigated quickly to determine if discrimination or harassment has occurred. All investigations will be conducted as discretely and confidentiality as feasible.

Any employee, regardless of position, found to have discriminated against or harassed another employee, applicant for employment, customer, or vendor will be subject to immediate and appropriate disciplinary action, up to and including termination. No employee will be retaliated against based on good faith complaints of discrimination or harassment. Fabricated claims will not be tolerated and may result in disciplinary action. Through consistent application of this policy, we will preserve the right of every employee to a workplace free of workplace discrimination, harassment, and retaliation.