Ball Corporation

Business Ethics Code of Conduct

A MESSAGE FROM DAN FISHER

Dear Colleagues:

At Ball, we are committed to demonstrating Uncompromising Integrity – an integral part of our Drive for 10 foundation – in every business and region where we operate. We are proud of the work our people do every day to maintain a culture of compliance, which ensures the continuity of our business and establishes the framework upon which our success is built.

Our 142-year history is characterized by the principles of trust and integrity, and we remain committed to serving our customers, partners, global communities and all other stakeholders in ethical ways. As we look to the future, it will become increasingly important for us to demonstrate our values in ways that not only set us apart from our competition, but allow us to move ahead with clarity and conviction in Who We Are.

You are asked to read and understand our Code of Business Conduct, which is designed to help guide our decision making and actions when we are faced with difficult circumstances. The Code reflects our belief that doing the right thing is a reflection of our remarkable legacy and a key to our long-term success.

Our Compliance Alliance team is committed to sharing periodic updates to keep us informed of our organization's policies and expectations of behavior. In the meantime, please familiarize yourself with this Code and know that we encourage you to take an active role in compliance. If you see or hear of behaviors that do not fully reflect our Ball spirit, please SPEAK UP.

Ball is a place where the passion, commitment and integrity of our people enables our collective success. Let's continue to demonstrate our values every day by always doing the right thing.

Dan Fisher
President and
Chief Executive Officer

A MESSAGE FROM THE COMPLIANCE ALLIANCE TEAM

At Ball, we believe that doing the right thing every day defines our company culture. Doing what is right means behaving like owners and being aware that our decisions impact our company. We must not only follow the rules but act with integrity. Doing the right thing starts with each of us, and it is everyone's responsibility.

We are all allies in maintaining Ball's integrity standards, and the Compliance Alliance is available if you have questions or wish to raise a concern related to any compliance topic. Each region and division has a designated ally or **Compliance Focal Point** that is ready to provide guidance on business ethics and compliance topics. You can also always reach out to the Compliance Alliance team in Colorado (complianceallliance@ball.com). Think of the Compliance Alliance as the keepers of the Code of Conduct: we are a resource to help you navigate the gray areas!

This Code provides you with important information about our policies and procedures, the compliance hotline and what is expected of each of us as Ball employees.

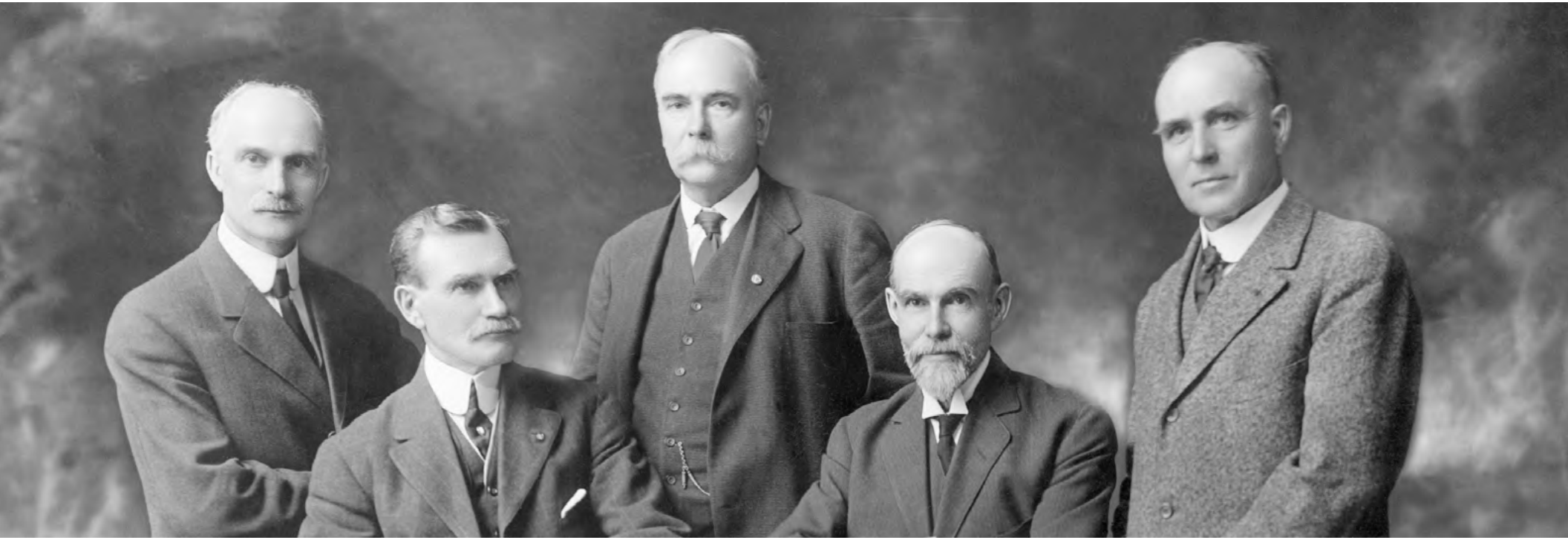
Refer to the Resources section or check the **Compliance Alliance** page on BallConnect for additional information about resources.

COMPLIANCE ALLIANCE

Starts with YOU

WHO WE ARE

Proud of our rich history, our company is founded upon the principles of innovation, teamwork and the relentless pursuit of excellence. Our people come together to deliver measurable value for our customers in a manner that is consistent with our Drive For 10 guiding principles. We operate with *Uncompromising Integrity* and always seek to do what is right, in the right way. Our commitment to embracing diversity of thought and creating a workplace where all employees belong fuels our "One Ball" vision and our ability to drive positive change, together.



UNCOMPROMISING INTEGRITY

We treat others how we wish to be treated, and in doing so, maintain our reputation of ethical behavior.

BEING CLOSE TO OUR CUSTOMERS

We are committed to operating in a way that brings us closer to our customers. We share our expertise and partner with customers to innovate and solve challenges as a team.

BEHAVING LIKE OWNERS

By behaving like true owners of our business and taking a deep interest in our long-term success, we – as One Ball – deliver superior results.

FOCUSING ON ATTENTION TO DETAIL

By managing our operations with relentless attention to detail, we position Ball to consistently deliver outstanding value for all of our stakeholders.

BEING INNOVATIVE

We strive to be innovative in our processes, our products and the way we conduct business, while focusing on our sustainability commitments as a way to drive positive change.

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INTRODUCTION

Ball's Business Ethics Code of Conduct is designed to help us apply our company's values to the day-to-day business situations we face worldwide. We are committed to conducting our business with high ethical standards and in compliance with all applicable laws, rules, regulations and company policies. At Ball, compliance is more than simply obeying the laws; it's how we approach our work with customers, suppliers, our communities and our entire stakeholder family.

PURPOSE

The Code is designed to identify common compliance issues and provide guidance and resources to help us all make the right decisions. However, the Code cannot anticipate all the issues we might face, so if you have any questions about the Code or about a business ethics concern, you should contact your manager, your human resources representative or the Compliance Alliance.

Our adherence to the Code and our policies is critical to Ball's continued success. Our corporate reputation depends on the actions and decisions we make every day. By doing all we can to act ethically and legally, we position ourselves to inspire the trust and confidence of our stakeholders.

As Ball employees, we are committed to conducting all of our business affairs using high ethical standards.

APPLICABILITY

The Code applies to Ball Corporation and its divisions, operations and subsidiaries, and to any greater-than-50-percent company-owned joint ventures. The Code also applies to any Ball employee who is seconded to any joint venture regardless of Ball's ownership percentage. Further, we should encourage all Ball business partners, including suppliers and agents, to adhere to the principles outlined in the Code.

NOT SURE WHAT TO DO? TAKE THIS QUIZ

All employees should use their best judgment and must conduct the business affairs of Ball in a lawful and ethical manner. Ask yourself the following questions when you are unsure of how you should act or behave in a particular situation:

Is it legal?	
Yes: Proceed	No: Stop

↓

Is this consistent with our Code of Conduct and our policies?	
Yes: Proceed	No: Stop

↓

How will this look -- and can I defend my decision?	
Yes: Proceed	No: Stop

↓

Does this feel right? Would I feel comfortable if others knew about it?	
Yes: Proceed	No: Stop

You should be able to answer all of these questions with a clear "yes." If you cannot, you should speak with your manager, your human resources representative or the Compliance Alliance before moving forward with the action. If you are unsure, seek guidance.

Ask if you see an issue. Ask if you are not sure.

OUR EXPECTATIONS

UNDERSTANDING OUR RESPONSIBILITIES

It does not matter where we work or what we do – as Ball employees, not only must we all apply our skills and abilities to meet customer needs and professional standards, but we must also do so in a way that ensures our conduct and work product meet applicable legal and ethical requirements. We do this by reading, understanding and complying with the Code, company policies and applicable legal requirements.

Find more information about Ball's policies on **BallConnect**.

ADDITIONAL RESPONSIBILITIES FOR MANAGERS

Although we all are responsible for maintaining corporate compliance, managers have the added responsibilities of maintaining compliance within their areas of influence and leading by example. Managers must set the highest standards of business conduct and demonstrate compliance with the Code. In addition, managers are expected to inspire compliance and personal accountability in others and to be responsive to questions and concerns. If you are a managers, you are expected to be both familiar with our policies and able to communicate with your teams about the following topics:

- Ensure your employees understand their obligation to maintain corporate compliance and act with integrity.
- Create an environment where your direct reports and other employees feel comfortable asking questions, voicing concerns and reporting perceived misconduct.
- Ensure your employees are aware of the resources available to report misconduct or violations as well as Ball's prohibition of retaliation against individuals who make a good faith report.

THE COST OF NONCOMPLIANCE

Violations of the Code, our policies or applicable legal requirements carry potentially serious consequences for the individuals involved and for our company. Employees and leaders who do not fulfill their integrity responsibilities may be subject to disciplinary action, up to and including termination of employment. Violations also place individuals and our company at risk of civil or criminal liability, damaged reputations and fines. The consequences for violating the Code apply to all Ball employees, including employees of any divisions, operations and subsidiaries, as well as to any employee seconded to a joint venture.

For more information, please refer to the **Corporate Compliance Policy** on BallConnect.

ADDRESSING OUR QUESTIONS & CONCERNS

REPORTING COMPLIANCE CONCERNS AND ASKING QUESTIONS

If you have observed misconduct or a violation of the Code, Ball policies or the law, or if you have a question regarding corporate compliance, consult with your manager, your human resources representative or the Compliance Alliance team.

Where local law allows, you do not need to identify yourself when making a report. If you choose to identify yourself, you may request confidential treatment and your identity will remain confidential whenever possible. Reports and complaints will be kept confidential to the extent it is possible under local legal requirements.

Your particular region or division may have additional policies, including ethical codes and handbooks, designed to reinforce and supplement Ball's corporate policies and the Code. Please take the time to familiarize yourself with your region's or division's policies.

For more information, please refer to the **Corporate Compliance Policy** on BallConnect.

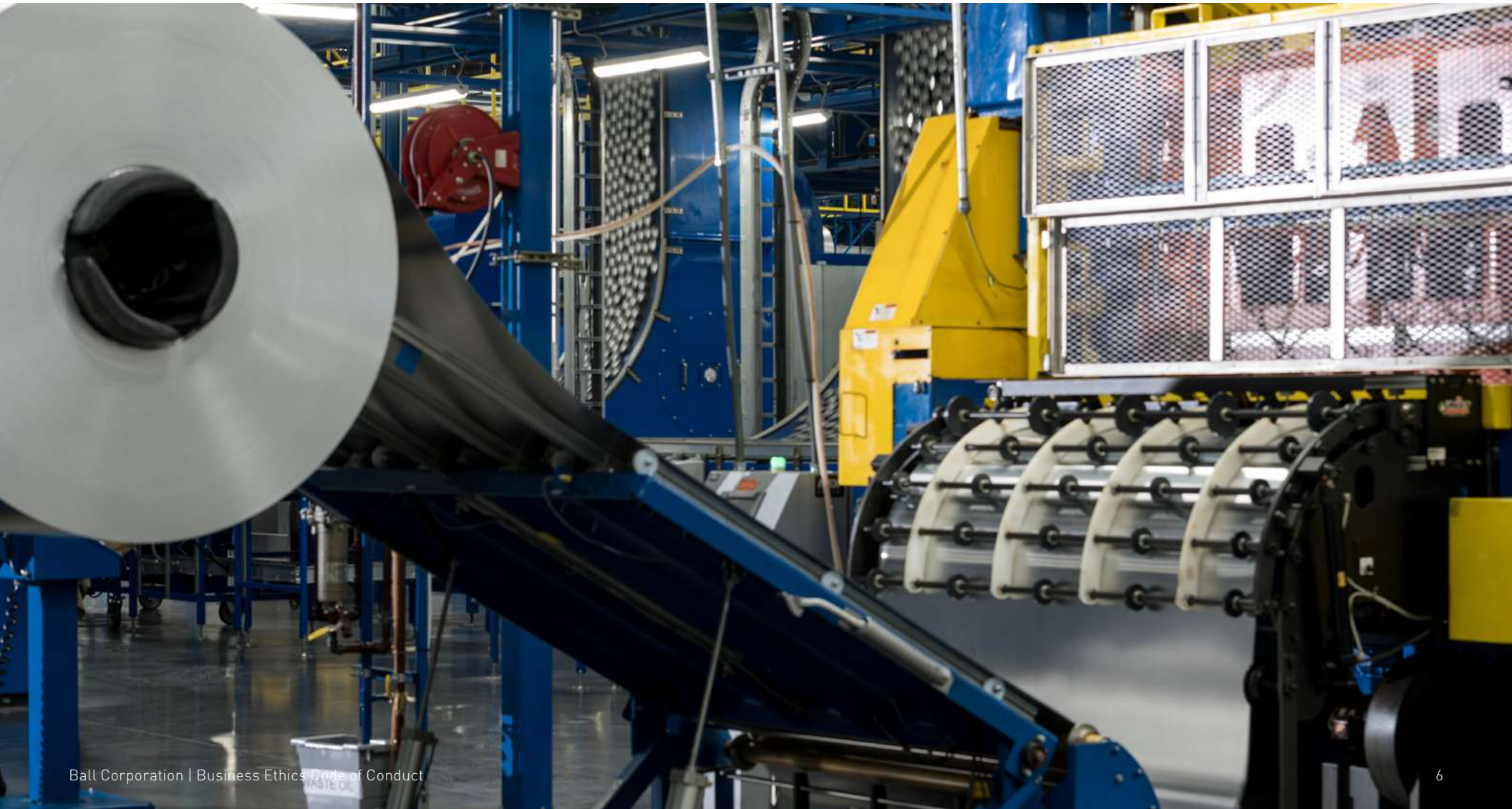
HOTLINE RESOURCES

To report your concerns, use one of the channels below or refer to the Resources section in this Code for additional information and local toll-free numbers. 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
Ball – Corporate and Packaging (U.S. only): **1-800-270-2879**
Ball Aerospace: **1-800-496-5962**

For your local hotline number, please refer to "**Additional Resources**" at the end of this document.

Speak Up! We are all responsible for protecting Ball's ethical culture and success.



INVESTIGATING COMPLIANCE REPORTS

Everyone is expected to cooperate fully in any company compliance-related investigation. Investigations will be conducted in accordance with Ball's procedures. Our investigative process addresses concerns and ensures the careful review of all reports. When asked to assist in an investigation, we must be truthful and share any and all information that may be relevant to the investigation. In addition, we must not act in a way that obstructs or attempts to influence the outcome of an investigation. When participating in an investigation, we must follow the instructions of the investigator regarding confidentiality and limiting disclosure of investigation-related information.

KEEP IN MIND

- When submitting concerns regarding conduct that may violate Ball policies, you must do so in good faith.
- Submit any information that will assist investigators in determining whether a policy violation may have occurred, like written statements, pictures and other communications.
- While submitting concerns based on a rumor without any additional evidence is permitted, we recommend that employees carefully consider facts and circumstances to determine the truthfulness of the rumor before submitting the concern. This may include asking the person spreading the rumor specific factual questions to determine whether there is a reasonable likelihood that the rumor is true.
- When submitting a concern, you may be able to remain anonymous if local laws allow. If you choose to identify yourself, Ball takes measures to ensure that your identity is released only if it is required by local legal requirements or if you have specifically requested that your identity be disclosed.

GOOD TO KNOW

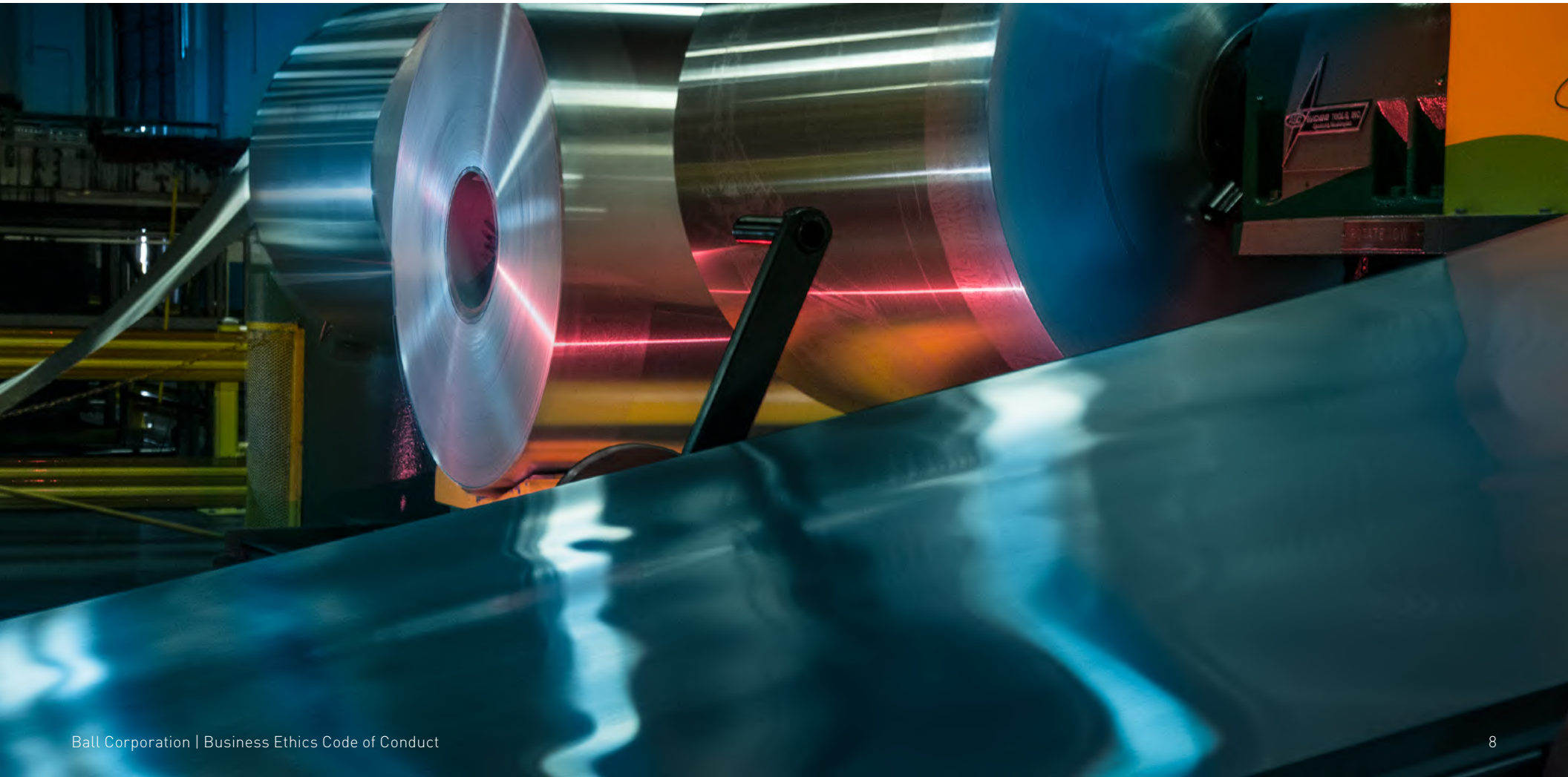
A "good faith report" means that you have information – your own personal knowledge or information received from others – that gives you a reasonable basis to believe that something has occurred that is likely to be considered a policy violation.

PROHIBITING RETALIATION

To maintain our ethical culture, we encourage open communication and timely reporting. Ball maintains a strict policy that prohibits retaliation of any kind against those who raise good-faith concerns. Our company prohibits and will discipline those who engage in all forms of retaliation, including but not limited to threats of discharge, demotion or suspension when such actions are because an individual submitted a good faith report, participated in an investigation or attempted to deter someone from violating Ball's policies and the Code of Conduct.

For more information, please refer to the **Prohibition of Retaliation Policy** on BallConnect.

Our company condemns any form of retaliation in response to a report made in good faith.



RESPECTING EACH OTHER

As part of our focus on our people and culture, we are committed to promoting an inclusive workplace environment that unlocks the unique qualities, values and potential of each employee. Leveraging diverse perspectives, experiences and aspirations helps to unleash ideas and fuel innovation, which drives growth and value throughout our global organization.

PROHIBITING DISCRIMINATION

Our company is committed to maintaining an inclusive work environment that attracts and retains a talented and diverse workforce. To ensure our success in establishing a positive environment, Ball prohibits discrimination of any kind.

Generally, discrimination is the practice of treating a person more or less favorably with respect to his or her employment because of a protected characteristic. Protected characteristics may include race, gender, ethnicity, color, age and other characteristics protected by either applicable legal requirements or specific corporate policy.

Ball offers employee placement, transfer, promotion, compensation and other advancement opportunities to the most qualified individuals, regardless of any protected characteristics.

PROHIBITING HARASSMENT

Ball is also committed to maintaining a workplace that is free from harassment. Harassment is behavior that creates an intimidating, hostile or offensive work environment or that unreasonably interferes with an individual's work performance. Harassment can take many forms, including:

- Offensive remarks
- Unwelcome sexual advances
- Derogatory, disparaging or suggestive jokes, emails or conduct

For more information, please refer to the **Respect in the Workplace Policy** on BallConnect and to other regional policies prohibiting discrimination.

KEEPING DATA PRIVATE

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. We should never access or obtain another employee's personal information without authorization, nor disclose another employee's personal information to anyone inside or outside of Ball. The only exceptions are cases in which we have proper approval and when the use of another employee's personal information is both for a legitimate business purpose and in accordance with legal requirements and company policies.

For more information, please refer to the **Global Data Protection Policy** on BallConnect.

COMPLYING WITH WAGE AND CHILD LABOR LAWS

We are committed to conducting our business in a manner consistent with applicable employment and human rights laws and regulations. Among other things, we are committed to complying with wage and hour laws to ensure that our employees are properly compensated for the work they perform. We have a zero-tolerance policy for the use of child or forced labor or for human trafficking practices, and we have the same expectations of businesses in our supply chain.

For more information, please refer to the **Child and Forced Labor Policy** and the **Human Rights Policy** on BallConnect.

PROTECTING WORKPLACE SAFETY AND HEALTH

Health and safety at work is one of our most significant priorities, and we must all work to minimize health and safety risks. We are expected to safeguard our own health and safety, as well as that of our fellow employees. We are focused on continuous improvement toward the ultimate goal of zero accidents. We must all be familiar with the health and safety procedures and policies that apply to our roles and make sure we fully follow all health and safety directives.

For more information, please refer to the **Environmental, Health and Safety Policy** on BallConnect.

PROHIBITING VIOLENCE AND WEAPONS IN THE WORKPLACE

We deserve to work in an environment that is free from violence and threatening behavior. Ball prohibits hostile or abusive behavior, threats or acts of violence, and the possession of prohibited weapons inside company facilities or during company activities as permitted by local laws. Furthermore, to provide for the safety and security of all employees and company facilities, only authorized visitors are allowed in the workplace.

For more information, please refer to the **Workplace Threats and Violence Policy** on BallConnect.

PREVENTING SUBSTANCE ABUSE

We have an obligation to attend our place of work fully alert and able to perform our job responsibilities. This means never coming to work impaired and always using moderation and good judgment if alcohol is served at a company-related meal or event. The abuse of alcohol, drugs and illegal substances is a serious breach of our obligations, and it can put our safety at risk and compromise our job performance.

For more information, please refer to the **Substance Abuse in the Workplace Policy** on BallConnect.

Our health and safety at work is one of our most significant priorities, and we must all work to minimize health and safety risks.

PROTECTING OUR COMPANY

AVOIDING CONFLICTS OF INTEREST

As Ball employees, we are expected to behave like owners of our company, which means we are responsible for acting in the company's best interests. We are expected to remain free of personal interests or relationships that are, or appear to be, conflicting, biased or detrimental to the best interests and reputation of our company. We should not use company assets, property or information nor our position for improper personal gain, nor should we engage in activities that compete with Ball.

As Ball employees, we are expected to behave like owners of our company, which means we are responsible for acting in the company's best interests.

Some examples of conflicts of interest

- Personal investments: Transacting with a company partially owned by you or a family member that is or could be a Ball partner or competitor, especially if you are involved in making decisions on behalf of Ball concerning that company
- Using your position or relationship within Ball to promote your own interests or those of your family members, including using confidential information acquired in the course of employment at Ball for personal benefit. This also includes supervising or having direct decision-making authority over a relative
- Approving contracts with business partners in which you or your family members have a significant financial or other interest or relationship, particularly if you are in a position to influence major decisions, are responsible for review, negotiation and approval of contracts, or otherwise direct Ball's business dealings with that business partner
- Using or taking Ball resources, including facilities, equipment, personnel, supplies or confidential information, for private use or unauthorized activities
- Personally accepting anything of value from business partners that have business or contracts either pending before or just executed with Ball
- Hiring or offering employment to former or current government employees, including military and civil service personnel, in any manner contrary to legal requirements or company policies
- Working with a competitor company as an employee, consultant or shareholder, or becoming an employee or consultant of any other company while still a Ball employee
- Engaging in an outside activity or having a relationship with an outside customer, supplier or other company that reflects adversely on the integrity or reputation of Ball

These situations do arise on occasion and are not necessarily violations; however, not disclosing the potential conflict is a violation. Therefore, should any such potential or actual situation occur, you must discuss it with your manager.

These situations do arise on occasion and are not necessarily violations; however, not disclosing the potential conflict is a violation. Therefore, should any such potential or actual situation occur, you must discuss it with your manager.

For more information, please refer to the **Conflicts of Interest Policy** on BallConnect.

GOOD TO KNOW

Relatives include parents, siblings, spouses, legal guardians, children, in-laws, grandparents, grandchildren, step-relatives or any person regularly residing in your household

KEEPING ACCURATE BOOKS AND RECORDS

All reports and information about the company must be recorded and presented accurately, diligently, fairly and in accordance with good business practices and applicable accounting standards and legal requirements. Whether the records or reports are time cards, expense reports, manufacturing records, test reports, environmental records, accounting records, correspondence, bids, purchase orders or similar documents, they must be truthful and complete. In addition:

- All records and financial statements must accurately reflect all transactions of the company.
- No false statements or entries may be made for any purpose in the records of the company.
- Care must be taken to ensure proper recording, disclosure and charging of all costs.

Additionally, we must follow the records management policies and retention schedules in the locations where we operate. These schedules specify the length of time for which we should maintain business records, as well as procedures for compliance with legal holds relating to potential, existing or past litigation.

Employees who contribute to the creation of records, or who complete or prepare reports, are responsible for reading and understanding corporate and divisional/regional policies and procedures as they apply to their organization. Time charges must be recorded promptly and accurately, and labor-charging procedures must be followed. Employees must use the company's authorized accounting and management systems. Managers must strictly enforce these standards and prevent deviations and report any irregularities to their own manager without delay.

For more information, please refer to the **Records Management Policy** on BallConnect.

QUESTION & ANSWER

Q: Jerome is responsible for preparing his department's quarterly financial reports and is generally quick to detect and correct any inaccuracies. These are usually the result of rushed entries and clerical errors and don't often require much of Jerome's time to fix. However, this quarter, he is noticing persistent irregularities that seem much more complex, even intentional. He finally pinpoints the source of the misreported revenue and believes that these entries may be part of a larger fraudulent act. What should he do?

A: Jerome should speak up. He has identified potential fraud in his team's financial reporting and must voice his concern immediately by contacting his manager, his human resources representative or the Compliance Alliance. It is not enough to simply correct the inaccuracies. Jerome will not face any retaliation for making such a report, even if a subsequent investigation determines no misconduct occurred.

RESPONDING TO GOVERNMENT AUDITS, INQUIRIES AND INVESTIGATIONS

We have a duty to cooperate with government investigations. This means we will provide the appropriate information, as requested, in a timely manner. However, we should first contact the Law Department and other relevant business or corporate functions before producing any documents or submitting to an interview to make sure we have all of the information we need to respond appropriately.

Ball does not prohibit or restrict us from reporting possible violations of laws or regulations to any governmental agency or entity, from participating in any investigations, with or without prior authorization or notice to Ball.

All reports and information about the company must be recorded and presented accurately.

PROTECTING OUR COMPANY'S INFORMATION

PREVENTING INSIDER TRADING

Ball employees and others associated with the company often have access to material, non-public information (commonly called "inside information") about the company or other companies with which we conduct business that is not available to people outside our company. As Ball employees, we must not engage in transactions relating to Ball stock or bonds, nor to the stock or bonds of any other company with which Ball does business, while we are in possession of material, non-public information about Ball or the other company.

GOOD TO KNOW

Inside information may include:

- *Information about plans for mergers, acquisitions or divestitures*
- *New product development*
- *Marketing strategy*
- *Financial results*
- *Contracts with customers or suppliers that are material to Ball*
- *Other significant business transactions that are material to the company*

"Material" refers to information that a reasonable investor would consider important when making an investment decision, like buying or selling stock.

We should be careful to not pass on inside information to anyone (commonly called "tipping").

For more information, please refer to the **Insider Trading Policy** on BallConnect.

As Ball employees, we must not use inside information to influence our own or anyone else's investment decisions, and we may not transact in Ball securities while in possession of material, non-public information.

PROTECTING INTELLECTUAL PROPERTY AND COMPANY CONFIDENTIAL INFORMATION

We may have access to our company's confidential information on a need-to-know basis. Such information must be protected during and after employment and may not be used for personal gain.

Company confidential information must be carefully controlled and protected, used only for the intended purposes and discussed only on a need-to-know basis with authorized persons or organizations. We must never share or give the company's files or information to unauthorized persons or organizations until we have received appropriate approval.

Ball's intellectual property (IP) is valuable to us and must be protected. IP can include copyrights, trademarks, designs, logos and brands.

The third parties we work with often share their confidential information and IP with us. We protect that information and IP just as carefully as we protect our own.

GOOD TO KNOW

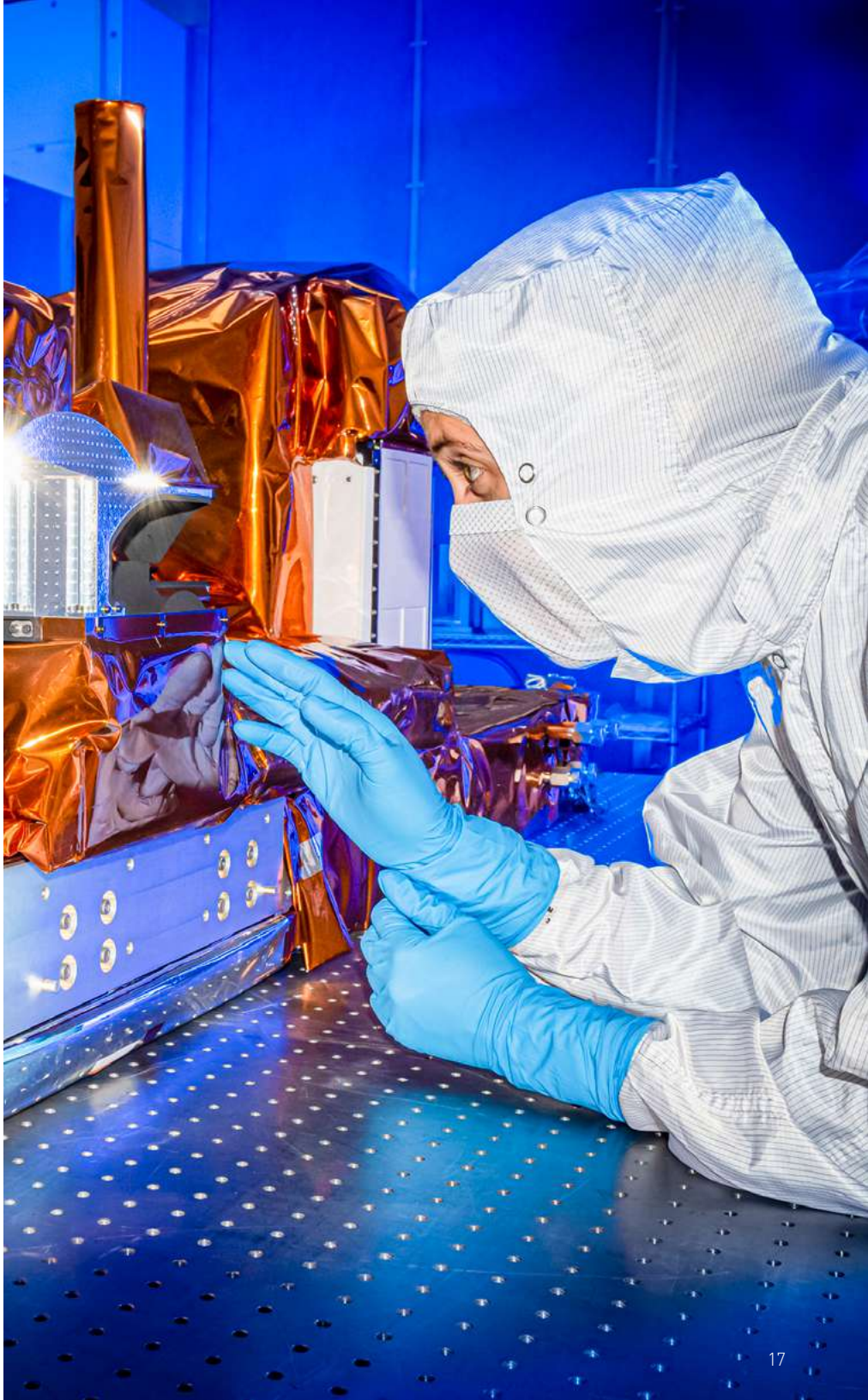
Company confidential information may include financial data, workplace operations, production processes, production records, employee information, business plans, software files, passwords, technical data, drawings, strategic and operating plans, customer data, contracts, agreements and other valuable company information.

For more information, please refer to the **Confidentiality Policy** on BallConnect.

QUESTION & ANSWER

Q: Greta is attending a trade show in London when she accidentally leaves her laptop in a coffee shop. She notices it is missing when she gets back to the hotel for the night. While Greta knows her laptop contains company confidential information, she is planning to go back to look for the laptop in the morning. Is this all she needs to do?

A: No. If Greta knows there is company confidential information on the laptop, she should immediately inform her regional information technology department, the Law Department and her manager to report the incident.



PROTECTING PHYSICAL PROPERTY

We are all responsible for preserving and protecting our company's assets, including its property, facilities, equipment and monies, and we are expected to use those assets appropriately.

SECURING INFORMATION

We are responsible for keeping all company information secure and for using Ball's network and computer systems ethically and legally. While occasional personal use of these systems is permitted, we must remember that our company reserves the right to monitor our use, except when prohibited by local law. We must follow all Ball security principles and internal controls when using our company's information and communications systems.

We must safeguard our passwords and other access codes by adhering to password protection policies. We should not allow others to use our accounts. Company information must not be transferred from our computers to unapproved portable devices.

We understand that the internet is a public place. When drafting any electronic message, please be aware that, once transmitted, messages can easily be altered, distorted and forwarded without our knowledge or permission. Emails, instant messages and text messages should be composed with the same care we take in composing any other company document. At no time may we use the internet or our email for unauthorized or illegal purposes or to download sexually suggestive, explicit or illegal material.

For more information, please refer to the **Appropriate Use Policy** and Other Information Technology policies on BallConnect.

Email, instant messages and text messages should be composed with the same care we take in composing any other company document.

USING SOCIAL MEDIA

Ball recognizes the importance of the internet in shaping public opinion about the company. We also recognize the important role employees can play in directing industry conversations through social media. We are committed to supporting employees' right to engage knowledgeably online by blogging and by engaging in other social media interactions.

When using social media, here are some general reminders and guidelines to follow:

- Never disclose material, non-public information about Ball.
- If you are posting something about Ball, determine whether local law requires you to disclose your relationship to the company.
- Messages posted on social media are permanent records that, like email, can be forwarded and altered without our consent.
- You may not share any confidential company information, such as customer or employee information, copyrighted materials or inside information, through your personal social media activities and communications.
- Respect others by not posting or sending content – such as discriminatory or harassing comments or inappropriate or embarrassing images – that violates this Code or company policies.
- As a general rule, please do not speak on behalf of Ball Corporation unless you are a designated company spokesperson.

Our Social Media Activity Policy provides guidance on making appropriate decisions about work-related blogging, postings and other internet activity as well as responding to others in the online world. This policy applies to our social media activity even when we are not at work.

For more information, please refer to the **Social Media Activity Policy** on BallConnect.

QUESTION & ANSWER

Q: Steven is reading posts on social media when he notices some statements about Ball that he knows are incorrect. Should he respond and set the record straight?

*A: No. Steven must not respond to the statements, but he should refer to the **Social Media Activity Policy** and let his manager know about the statements.*

COMMUNICATING WITH INVESTORS, MEDIA AND INTEREST GROUPS

Our company must speak with one voice to investors, analysts, the press and public interest groups, and our company communications must comply with applicable legal requirements and company policies. We must not communicate on behalf of our company, even if the statement is online, unless we are an authorized spokesperson for the company or have first contacted the Corporate Communications Department or Investor Relations.

For more information, please refer to the **Public Relations Policy** and the **Public Affairs Policy** on BallConnect.

We must not communicate on behalf of our company, even if the statement is online.

INTERACTING WITH OUR CUSTOMERS, SUPPLIERS & OTHER BUSINESS PARTNERS

GIVING AND RECEIVING GIFTS AND GRATUITIES

In all business dealings, anyone who works for or on behalf of our company must conduct himself or herself in ways that avoid any real or perceived impropriety. We may occasionally give or receive modest gifts or other gratuities such as meals and entertainment with current or prospective customers, suppliers or other business partners. However, allegations of bribery or corruption can arise if any gift or gratuity is even perceived to be given or received with the intent of improperly influencing a business decision.

In all business dealings, anyone who works for or on behalf of our company must conduct himself or herself in ways that avoid any real or perceived impropriety.

In order to minimize the risk associated with improper gifts and gratuities, any gift or gratuity we give or receive should be:

- Associated with a business purpose
- Appropriate as to time and place
- Of nominal value
- Infrequent
- Unsolicited
- Something other than cash or cash equivalents, such as gift cards
- Documented properly
- In compliance with applicable company/other party policies (both giver and receiver)
- In compliance with applicable legal requirements, including local laws
- A transaction that would not create an impression of impropriety

We should be prepared to diplomatically decline any gift or gratuity offered to us that does not meet these requirements.

In addition, government agencies and departments often operate under strict requirements concerning the acceptance of gifts or other gratuities by their employees and family members. We must be familiar with these requirements of government agencies, as well as those of customers, suppliers and other business partners who have strong relationships with government agencies.

For more information, please refer to the **Use of Corporate Assets Policy** and the **Foreign Corrupt Practices/Global Anti-Corruption Policy** on BallConnect.

GOOD TO KNOW – for U.S. Government

U.S. government employees are prohibited from accepting any gift or gratuity at any value except for promotional items that are of nominal value and subject to the $20/$50 rule (discussed below). Based on these prohibitions, giving or offering gifts or other gratuities to customers, vendors and suppliers who have strong relationships with the U.S. government is allowed only if the aggregate value given per occasion is no more than $20. Additionally, the aggregate value of gifts/other gratuities given may not exceed $50 in a calendar year.

Gifts and gratuities offered to members of the U.S. Congress or their staff are highly regulated by the Honest Leadership and Open Government Act of 2007. Due to the complexity of these restrictions, Ball employees must not offer any gift or gratuity to members of the U.S. Congress or their staff without advance company approval. These restrictions do not apply to political contributions made by employees in a non-business capacity.

QUESTION & ANSWER

Q: Phillip, who works for a Ball supplier, recently sent Josie an expensive Rolex watch with a note that reads, "Thank you for your continued patronage. We look forward to working together for many more years!" Josie does not want to offend Phillip, but she is uncomfortable accepting such a lavish gift. What should Josie do?

A: Josie should not accept the watch. While it is a nice gesture, due to its high value it could be, or could appear to be, a gift intended to improperly influence Josie's business decisions. As Ball employees, our vendor relationships and purchasing decisions must always be made on merit and not on the basis of a gift. If Josie has questions or feels returning the gift would offend Phillip, she should contact the Compliance Alliance, the Law Department or her manager for guidance.

AVOIDING BRIBERY AND CORRUPTION

We compete based on our innovative products and our focus on being close to customers. We never bribe or improperly influence our commercial partners or any government officials.

There are many international laws that prohibit bribery and corruption, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, the Brazilian Anti-Corruption Law and similar anti-corruption laws adopted by many other countries. Importantly, even if bribes are described as being a local custom or are small in amount, they are almost always illegal and are always against company policy.

Both individuals and the company can be severely punished for violations of anti-corruption laws, and no potential business opportunity can outweigh our reputation for integrity. We never agree to directly or indirectly offer, promise or pay anything of value to influence the decision-making of a government official or any of our commercial partners. We do not solicit or accept bribes for ourselves or on behalf of the company, nor do we give or receive kickbacks.

We work with many third parties, some of whom may act on our behalf or even interact with government officials. Therefore, we must be careful when engaging with these third parties and must monitor the actions they take on our behalf. Since our third parties are subject to the same anti-corruption requirements that we are, we do not conduct business with any third party that bribes or accepts bribes on our behalf.

For more information, please contact the Compliance Alliance or the Law Department or refer to the **Foreign Corrupt Practices/ Global Anti-Corruption Policy** on BallConnect.

We do not solicit or accept bribes for ourselves or on behalf of the company, nor give or receive kickbacks.

GOOD TO KNOW

A government official can be an officer, employee or representative of a government agency or an employee of a government-owned or -controlled business. The term is defined broadly, includes family members of officials and can apply even if the government connection is not obvious, such as in the case of a company general manager where a foreign government owns a controlling interest in the company.

Third party agents are any non-employees of Ball, such as agents, consultants, representatives, suppliers, distributors, who would be authorized to act on Ball's behalf.

QUESTION & ANSWER

Q: Evan is attempting to secure permits to open a new Ball facility in an unfamiliar country. He has been told that if he hires a particular local consultant and provides a fee, the permits can be secured easily. Should he proceed?

A: Evan should be cautious. When we work with third parties, we must be certain they are complying with all applicable legal requirements, including anti-corruption requirements. We should make sure that all due diligence procedures for the use of third-party agents have been followed. If there are any questions about engaging third parties or the actions of third parties, please contact the Compliance Alliance or the Law Department.

CONDUCTING BUSINESS FAIRLY

FAIR COMPETITION

There are many international laws that apply to our company that make having certain discussions with competitors and other anti-competitive business activities illegal. For example, it is unlawful for business competitors, either by an express agreement or by engaging in joint action, to fix the prices or profit margins for their products; set production levels for their products; divide markets for their products, either geographically or by customer; or engage in collusive bidding for opportunities to supply that are awarded on the basis of competitive bidding (so-called "bid rigging").

Accordingly, we should not discuss, exchange information or agree with competitors on:

- Prices or other terms of sale with customers
- Prices or other terms of purchase from suppliers
- Which customers will be supplied what products
- Which suppliers will be used or what products will be purchased from specific suppliers
- Monopolizing, dominating or controlling markets
- Ceasing manufacturing, selling or distributing a product for or to a customer or geographic market

There are many international laws that apply to our company that make having certain discussions with competitors and other anti-competitive business activities illegal.

If a competitor attempts to talk to us about any of these topics or invites us to engage in any other anti-competitive behavior, we should immediately contact the Law Department or the Compliance Alliance. Not only can the appearance of anti-competitive behavior cause trouble for our company, but it may also attract criminal sanctions for those involved, as well as harm our business's reputation. Be mindful of situations that could lead to questionable conduct, such as trade shows or conventions, and ask questions if there are concerns.

For more information, please refer to the **Antitrust Policy** on BallConnect.

QUESTION & ANSWER

Q: Katya is at a trade show lunch and is sitting next to Dean, an employee of a competitor. Dean asks Katya if Ball is going to be moving into any new product areas and reveals that his company is going to be releasing new products that would compete with Ball. Katya declines to discuss anything with Dean and leaves. Since she did not reveal any Ball information and left immediately, does she still need to report this incident?

A: Yes. Dean revealed information to Katya, and he appears to be attempting to improperly learn about Ball's product strategy. Katya should immediately contact the Compliance Alliance or the Law Department.

GOOD TO KNOW

Do not discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, terms or conditions of sale, market segments, clients or marketing strategies. If a discussion turns to a competitively sensitive subject, stop the conversation, remove yourself from the situation and immediately report the incident to the Compliance Alliance or the Law Department.

FAIR DEALING AND MARKETING PRACTICES

Information about competitors and suppliers is a valuable asset. We respect the rights of our competitors and suppliers and will always behave fairly towards them. We strive for competitive advantages through the quality of our product, not through unethical business practices.

When conducting business for Ball, we must make sure we engage in forthright and fair behavior. We should avoid making disparaging or untrue statements about competitors and inaccurate or unfair statements about our products when compared to our competitors'. Violations of these practices could lead to civil or criminal liability for Ball and involved employees.

PRODUCT QUALITY

Throughout our different divisions, our long-term success is based on producing high quality products. As employees, we play an important role in taking all the necessary steps to ensure consistency and quality in our deliverables. Whether it is in our plants, laboratories or office locations, if we see something that is not up to Ball standards, we should contact our manager or the Compliance Alliance.

We respect the rights of our competitors and suppliers and will always behave fairly towards them.

SUPPORTING OUR COMMUNITIES

PROTECTING THE ENVIRONMENT

Our company's facilities are managed and operated in a manner consistent with our corporate environmental policy and all applicable legal requirements and regulations. Each operating or business unit maintains an environmental management system appropriate for its operations, and we all must be aware of our responsibilities under these systems. Our company strives to be a leader in environmental accountability and the minimizing of current and future environmental risk.

For more information, please refer to the **Environmental Compliance Policy** on BallConnect.

Our company strives to be a leader in environmental accountability.

INVOLVEMENT IN THE COMMUNITY

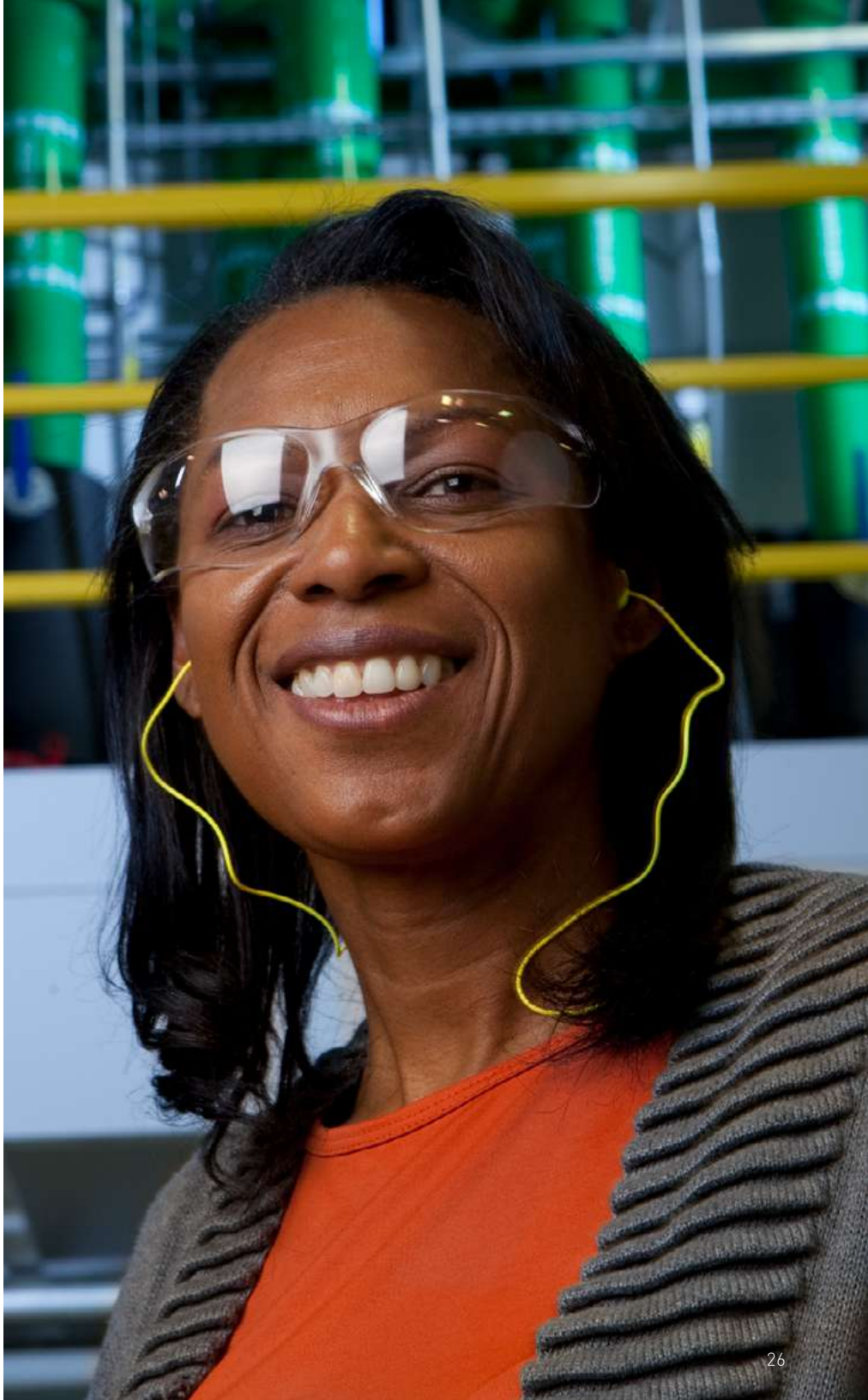
SUSTAINABILITY

Sustainability is a systematic way of thinking about the things we do every day as a global company and how our activities interact with the world around us. By balancing economic, environmental and social impacts in our decision-making and activities, we create long-term, shared value for our company and our stakeholders.

For decades, we have reduced the amount of material in our packaging products, increased energy efficiency, improved safety performance, supported packaging recycling programs, contributed to charitable organizations and invested in the communities where we live and work. Today, we focus our sustainability efforts on key priority areas, including product stewardship, operational excellence, talent management and community ambassadors. In our operations, we concentrate on the Big 6, namely safety, electricity, gas, water, waste and volatile organic compounds (VOCs).

The company's biennial sustainability report describes our sustainability strategy, past performance and future goals. To learn more about Ball's commitment to sustainability, visit www.ball.com/sustainability. All employees should understand and work toward our sustainability goals. Whether it's through large actions, like installing more efficient equipment, or through small individual actions, such as volunteering, promoting recycling or turning off lights, we can all embody a sustainability mindset here at Ball.

We focus our sustainability efforts on six corporate sustainability priorities: innovation, operations, talent management, recycling, supply chain and community.



CHARITABLE ORGANIZATIONS

Our commitment to the communities where we live and operate has been an integral part of Ball's corporate culture since our company was founded. We support organizations, programs and civic initiatives that advance sustainable livelihoods and encourage community philanthropy and volunteerism through Ball-sponsored charitable donations and other causes. We must make sure our volunteerism, donations and involvement in the community complies with our Code, our policies and the law, and make sure, for example, that our donations are not in violation of anti-corruption laws or other applicable standards and rules.

For more information, please refer to the **Matching Gifts and Volunteer Policy** on BallConnect.

PARTICIPATING RESPONSIBLY IN POLITICAL ACTIVITIES

Our company encourages us as individuals to participate in the political process in any lawful way that we choose. However, Ball's contributions to political campaigns are highly regulated. Our policy specifically prohibits use of corporate assets for political purposes to the extent prohibited by law. Ball has formed and maintains a political action committee (BallPAC) through which it legally makes contributions to candidates seeking election to the U.S. Congress.

For more information, please refer to the **Political Contributions and Political Actions of Employees Policy** and the **Foreign Corrupt Practices/Global Anti-Corruption Policy** on BallConnect.

COMPLIANCE WITH ECONOMIC AND TRADE SANCTIONS

We are committed to compliance with all applicable trade laws and regulations. The United States, the European Union and many other locations where Ball conducts business have regulations governing the import and export of goods, software, technology and technical data (including electronically transmitted data and services) as well as regulations regarding embargoes, boycotts and other economic sanctions.

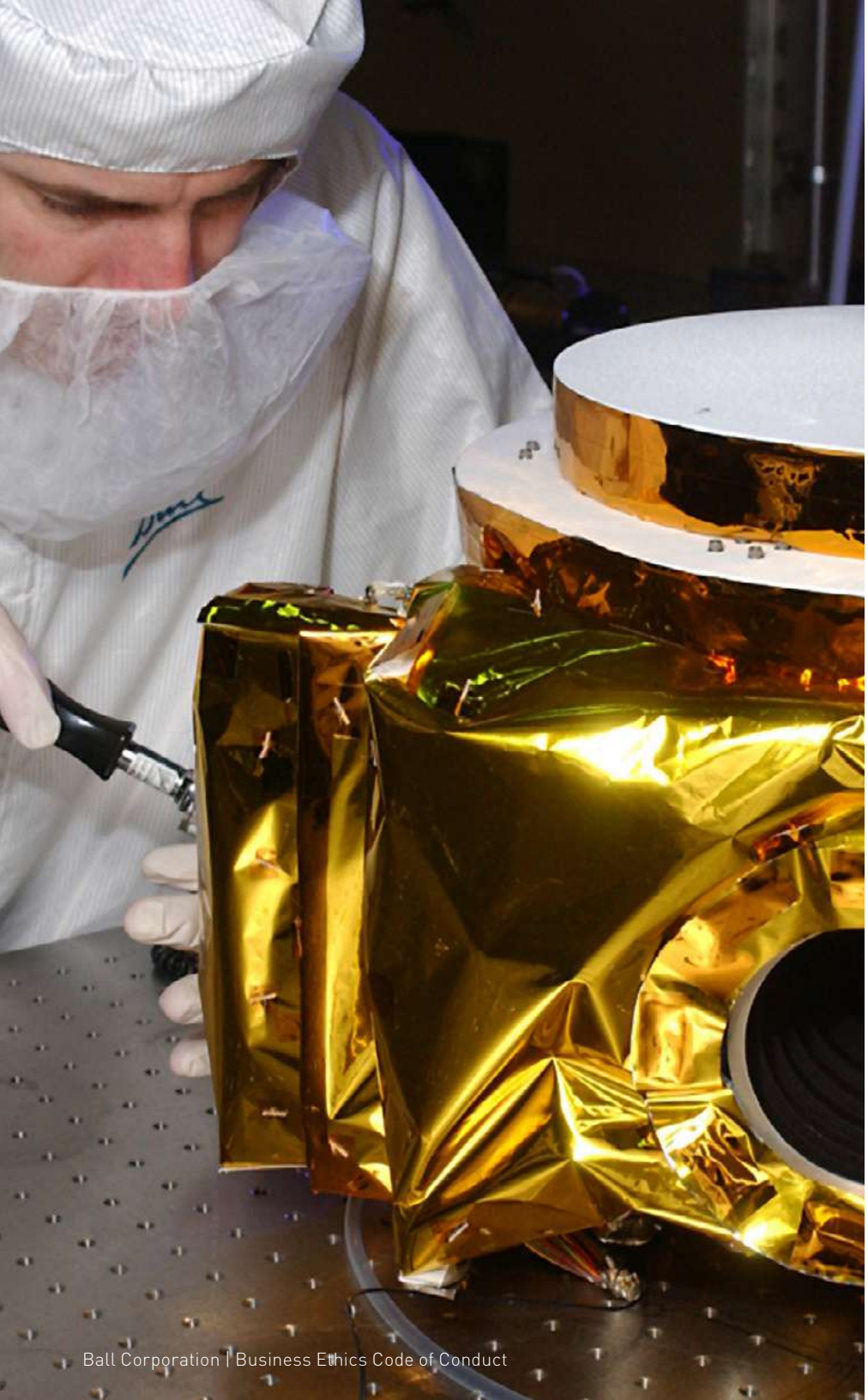
Trade laws and regulations prevent Ball from engaging in trade with specific persons, entities and countries. Breach of these trade laws can result in significant financial and criminal penalties being imposed against Ball and the responsible employees. Failure to comply with Ball's Economic and Trade Sanctions Policy may affect an employee's evaluation and may result in disciplinary action, including termination of employment.

These laws and regulations are complex and change periodically. For more information, please refer to the **Export and Import Compliance Policy** and the **Compliance with Economic and Trade Sanctions Policy** on BallConnect.

AVOIDING MONEY LAUNDERING

Our company complies with all applicable legal requirements that prohibit money laundering. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

We must be proactive when it comes to unusual or suspicious transactions. We must know the types of transactions and activities in our department that are more susceptible to acts of money laundering and require increased monitoring. If we see or suspect an activity or transaction, we must contact our manager or the Compliance Alliance immediately.



DEVELOPING BUSINESS INTELLIGENCE FAIRLY

Our company develops plans and strategies to gain an understanding of the marketplace, anticipate technology and business changes and assess the impact of competition.

While gaining publicly available information about competitors and their goods and services is entirely proper and regularly practiced throughout our industries, the process of gaining it must be legal and ethical. For example, it is prohibited to seek or use confidential IP belonging to any supplier, customer, competitor or business ally. In addition, we must never make disparaging remarks about our competitors, nor make unfair comparisons between a competitor's products and services and our own.

Occasionally, we may have or be offered access to the confidential information of a competitor or other company. Unless it is clear that the competitor or other company authorized the disclosure of such information, we should decline the offer or return any material already received, and we should not make or retain any copies. Information about a competitor or another company should be treated with the same respect that we would desire others to use upon encountering Ball's confidential information.

DISCLOSURE OF WAIVERS

Any waiver of any provision of the Code must be approved in advance by our company's board of directors or by an appropriate committee of the board of directors. Any waiver of the Code approved by the board of directors for an executive officer or director must be promptly and publicly disclosed to shareholders.

Our company develops plans and strategies to gain an understanding of the marketplace, anticipate technology and business changes and assess the impact of competition

ADDITIONAL RESOURCES

In many cases, your manager or a human resources representative will be a good resource to help you with questions or concerns or point you in the right direction.

COMPLIANCE ALLIANCE

To ask questions or report concerns related to this Code of Conduct, policies and procedures, or any other ethics or compliance-related issues, contact the Compliance Alliance or your regional Compliance Focal Point.
complliancealliance@ball.com

COMPLIANCE ALLIANCE HOTLINE

To report your compliance concerns, visit ballcompliancehotline.com or call your local Compliance Alliance Hotline toll-free number. The reporting service is run by an independent third party and is available 24 hours a day, seven days a week.

LAW DEPARTMENT

There are regional and divisional subject matter experts within the Law Department available to answer questions and respond to concerns. If you have a legal, conflict-of-interest or ethical concern, you may contact one of our lawyers.

INTERNAL AUDIT

The internal audit team is available for questions or concerns regarding internal accounting controls or auditing matters.
InternalAudit@ball.com

COMPLIANCE HOTLINES

UNITED STATES
Corporate/Packaging 1-800-270-2879
Aerospace 1-800-496-5962

ARGENTINA 800-666-1246
AUSTRIA 0800-802298
BRAZIL 0-800-020-3400
CANADA 1-800-269-8163
CHILE 800-914-313
CZECH REPUBLIC 800-810-915
DENMARK 8082-0147
EGYPT 0800-000-9377
FINLAND 0800-07-636
FRANCE 0805-080245
GERMANY 0800-180-0602
INDIA 000 800 919 1520
IRELAND 1-800-904-178
ITALY 800-788-058
MEXICO 800-681-6521
MYANMAR 720-904-6581
NETHERLANDS 0-800-022-1241
PARAGUAY 009-800-542-0162
POLAND 48-222922675
RUSSIA 8-800-100-6294

SAUDI ARABIA
(Local Landline) 0-8111072514
(Toll free - Only Etihad Atheeb/Mobility/Zain networks) ... 800-850-0479
(Toll free - Only STC Network) 800-855-2158

SERBIA 0800-190-162
SPAIN 900-839195
SWEDEN 020-888-506
SWITZERLAND 0800-321-013
TURKEY 0800 621 2217
UNITED KINGDOM 0-808-189-1083
VIETNAM 84-24-44-583357

Business Ethics Code of Conduct
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all photographs taken prior to
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