



BALL METALPACK

BUSINESS ETHICS CODE OF CONDUCT

GENERAL POLICY

Introduction:

The Ball Metalpack Business Ethics Code of Conduct applies our corporate values to the day-to-day business situations we face. As Ball Metalpack employees, we are committed to conducting all our business affairs using high ethical standards and in compliance with all laws, rules, regulations and Company policies. We believe compliance is more than simply obeying the law, and that integrity and ethical conduct are just as important.

Purpose:

The Code is designed to provide clear guidance and resources to help us make the right decisions. However, because the Code cannot anticipate all the issues we might face, if you have any questions about the Code or about a business ethics concern, you should review the specific policy and then if you still have questions or concerns, contact your supervisor or the Law Department.

Following the spirit of the Code and our policies is critical to Ball Metalpack's continued success. Our reputation depends on the actions and decisions we make every day. By doing all we can to act ethically and in compliance with the Code, we will continue to inspire the trust and confidence of our stakeholders.

Applicability:

The Code applies to Ball Metalpack and all of its operations and subsidiaries. Further, all Ball Metalpack business partners, including suppliers, agents and vendors, unless contractual terms between Ball Metalpack and any suppliers, agents and vendors, have more stringent requirements, such suppliers, agents and vendors should strive to adhere to the principles outlined in our Code.

OUR EXPECTATIONS

Shared Responsibilities:

We must apply our skills and abilities not only to meet customer needs and professional standards, but also 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.

Additional Responsibilities for Supervisors:

Although we all are responsible for maintaining corporate compliance, supervisors have the added responsibilities of maintaining compliance within their areas of influence and leading by example. They must set the highest standards of business conduct and demonstrate compliance with the Code. In addition, supervisors are expected to inspire compliance and personal accountability in others and to be responsive to questions and concerns. If you are a supervisor, at a minimum, you must:

- ⚙️ Ensure your employees understand their obligation to maintain corporate compliance and act with integrity.
- ⚙️ Create an open-door 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. You should also clearly communicate Ball Metalpack's no retaliation policy and ensure individuals who make a good faith report are protected from any form of retaliation.

Consequences for Violating the Code:

Violations of the Code, our policies, or applicable legal requirements carry potentially serious consequences for the individuals involved and for our Company. Individuals 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 reputation and fines.

ADDRESSING QUESTIONS AND CONCERNS

No Retaliation at Ball Metalpack:

To protect us and to encourage open communication, Ball Metalpack maintains a policy of no retaliation for good faith use of the Ball Metalpack Ethics Line or for raising compliance concerns. Our Company will never condone any form of retaliation, including harassment, discrimination or threats of discharge, demotion or suspension, because of a good faith report.

Compliance Resources and Hotline Information:

If you have observed misconduct or a violation of the Code, Ball Metalpack policies, or legal requirements, or have a question regarding corporate compliance, contact any of the resources below. When seeking guidance, first consult the Code and any relevant Company policy. Then, if you still have questions, consult with your supervisor or another available resource listed below:

- ⚙️ Department or Facility Supervisor/Manager
- ⚙️ Human Resources Representative
- ⚙️ Plant Manager
- ⚙️ Law Department
- ⚙️ Business Unit Executive
- ⚙️ Compliance Hotline at www.BMPethicsline.com or 800-461-9330

Choice to Identify and Confidentiality:

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, complaints, and the results of investigations will be kept confidential to the extent permitted by law.

Your particular operation may have additional policies, including ethical codes and handbooks, which are designed to reinforce and supplement Ball Metalpack's corporate policies and the Code. These additional policies are important and you should familiarize yourself with them.

Investigation of Compliance Reports:

Everyone is expected to cooperate fully in any Company compliance-related investigation. All investigations will be conducted in an ethical and professional manner and in compliance with applicable legal requirements and Ball Metalpack policies. When asked to assist in an investigation, we must be truthful and share fully any information we have. In addition, we must not act in a way that interferes with or obstructs an investigation. When participating in an investigation, please follow the instructions of the investigator regarding disclosure of information relating to the investigation.

RESPECTING EACH OTHER

Anti-Discrimination:

Our Company is committed to attracting and retaining a talented, collaborative, and diverse workforce. To ensure our success, we do not tolerate discrimination. Generally, discrimination is treating a person more or less favorably with respect to his or her employment because of a protected characteristic such as race, ethnicity, color, creed, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability, veteran status or other characteristic protected by either applicable legal requirements or specific corporate policy.

As part of our anti-discrimination policy, Ball Metalpack offers employee placement, transfer, promotion, compensation and other advancement opportunities to the most qualified individuals, regardless of any protected characteristics.

Anti-Harassment:

At Ball Metalpack, we do not tolerate harassment of any kind. Harassment is behavior that creates an intimidating, hostile or offensive work environment or that unreasonably interferes with an individual's work performance. It may occur in many forms, including:

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

Employee Privacy:

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 Metalpack. The only exceptions are cases in which we have proper approval and the use of another employee's personal information is both for a legitimate business purpose and in accordance with legal requirements and Company policies.

Compliance with Labor and Wage 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 provide reasonable working hours and fair wages in compliance with local laws. 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.

Workplace Safety and Health:

Ball Metalpack views health and safety as one of its most important business priorities. As such, we work to minimize the risks inherent in our business and to provide employees with the information necessary to minimize individual risk. We employ tools such as behavior-based safety training, workplace inspections and industrial hygiene monitoring to help prevent injuries. We are expected to safeguard our own health and safety, as well as that of our fellow employees. Our sustainability goal is focused on continuous improvement toward the ultimate goal of zero accidents.

Violence and Weapons in the Workplace:

We deserve to work in an environment that is free from violence and threatening behavior. Ball Metalpack does not condone threats or acts of violence, hostile or abusive behavior, or the possession of prohibited weapons in Company facilities or during Company activities. Further, to provide for the safety and security of all employees and Company facilities, only authorized visitors are allowed in the workplace.

Substance Abuse:

We have an obligation to attend our place of work fully alert and able to perform our jobs. 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 this obligation; it may put our safety at risk and compromise our job performance as well as Ball Metalpack's business interests.

PROTECTING OUR COMPANY AND COMPANY INFORMATION

Conflicts of Interest:

As Ball Metalpack employees, we are expected to behave as owners of our Company, which means we are responsible for acting in the Company's best interests. We are expected to remain free of 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, information or position for improper personal gain, nor otherwise compete with the Company.

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

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.

Additionally, we must follow the records management policies and retention schedules in the locations where we operate. These schedules propose the length of time for which we should maintain business records, as well as procedures for compliance with legal holds.

Employees who contribute to the creation of records, or who complete or prepare reports, are responsible for reading and understanding corporate 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. Supervisors must strictly enforce these standards and prevent deviations.

Responding to Government Audits, Inquiries and Investigations:

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

Protecting Intellectual Property And Company Confidential Information:

We may have access to Company 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 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.

Company confidential information must be carefully controlled and protected, used only for the intended purpose, and discussed only on a need-to-know basis with authorized persons or organizations. Never share or give the Company's files or information to unauthorized persons or organizations without appropriate approval.

Ball Metalpack's Intellectual Property (IP) is valuable to us and should not be disclosed. 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.

Physical Property:

Every Ball Metalpack employee is responsible for preserving and protecting our Company's assets, including its property, facilities, equipment and monies, and is expected to use those assets appropriately.

Information Security and Electronic Usage:

We are responsible for keeping all Company information secure and for using Ball Metalpack'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 Metalpack security principles and internal controls for our 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 be easily altered, distorted and forwarded without our knowledge or permission. Email, 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 or explicit material or other illegal material.

Social Media:

Ball Metalpack recognizes the importance of the Internet in shaping public opinion about the Company and our current and potential products, employees, suppliers and customers. We also recognize the importance of our employees joining in and helping shape industry conversation and direction through social media. We are committed to supporting employees' right to engage knowledgeable on the Internet through blogging and other social media interactions.

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

- ⚠ Messages posted on social media are permanent records that, like email, can be forwarded and altered without our consent.
- ⚠ In our purely personal communications through social media, we may not share Company confidential information such as customer or employee information, copyrighted materials or inside information.
- ⚠ Respect others by not posting or sending content that violates the Code or Company policies, such as discriminatory or harassing comments or inappropriate or embarrassing images.

Communications with Investors, Press 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 Legal Department and/or Chief Executive Officer.

INTERACTING WITH OUR CUSTOMERS, SUPPLIERS & OTHER BUSINESS PARTNERS

Anti-Corruption Laws:

Ball Metalpack is committed to acting professionally, fairly, and with integrity in all its business dealings. As part of this commitment to ethical business practices, Ball Metalpack does not tolerate any form of bribery or corruption.

Further, the exchange or provision of modest gifts and hospitality must be strictly limited in value and frequency and be kept within the limits of customary business practices and all applicable laws. In any case, employees must not offer, request, or accept gifts or hospitality designed to obligate, induce, support, or regard improper conduct in connection with any business.

Minimizing Risk:

In order to minimize the risk of 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
- ⊗ Documented properly (date, time, place, description, value, to whom, for what reason)
- ⊗ 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.

Governmental Restrictions:

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 example, U.S. government employees are prohibited from accepting any gift or gratuity at any value except for promotional items 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 only allowed 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 is highly regulated by the Honest Leadership and Open Government Act of 2007. Due to the complexity of these restrictions, 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 nonbusiness capacity.

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.

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.

There are many international laws that prohibit bribery and corruption, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 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 punished severely 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 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 diligent when engaging these third parties and must monitor their activities on our behalf; including but not limited to following Ball Metalpack's vendor anti-corruption due diligence procedures. Since our third parties are subject to the same anti-corruption requirements that we are, we do not conduct business with any third party who bribes or accepts bribes on our behalf. Ball Metalpack prohibits directly or indirectly making, promising, offering, soliciting, or receiving anything of value that would reasonably be construed as an improper payment to/from any person, or authorizing any such improper payment, in order to cause the individual to act contrary to his or her duties or employment obligations, obtain or retain business or secure an improper business advantage, or direct business to any person or entity. This prohibition applies to improper payments to/from a private entity, "foreign [government] official" under the FCPA, or "foreign public official" under the UKBA. This prohibition includes payments by third-party representatives engaged by Ball Metalpack, including agents, consultants, and lobbyists.

Improper payments may arise in a variety of settings and include a broad range of payments beyond the obvious cash bribe or kickback. This policy, consistent with the FCPA and UKBA, prohibits giving anything of value that would reasonably be construed as an improper payment. This term is very broad and can include cash and noncash items such as: (a) gifts; (b) travel, meals, lodging, entertainment, and gift cards; (c) loans and non-arm's length transactions; (d) charitable donations; and (e) employment opportunities.

Any director, officer, or employee who has questions or concerns should contact the Law Department. When in doubt about the appropriateness of any conduct, Ball Metalpack requires that directors, officers, and employees seek additional guidance before taking any action that may subject Ball Metalpack to potential liability under the FCPA, UKBA, or other applicable anti-corruption law.

Competition Laws:

There are many international laws that apply to our Company's business 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 "bidrigging").

Accordingly, we should not discuss, exchange 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

If a competitor attempts to talk to you about any of these topics or invites you to engage in any other anti-competitive behavior, you should immediately contact the Law Department. Keep in mind that even the appearance of anti-competitive behavior can cause trouble for our Company. Be mindful of situations that could lead to questionable conduct, such as trade shows or conventions, and ask questions if you have concerns.

ENVIRONMENTAL AWARENESS

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.

Political Activities and Contributions:

Our Company encourages us to participate in the political process in any lawful way that we choose. However, the Company'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.

Trade Compliance:

We are committed to compliance with all applicable trade laws and regulations, including those governing the import and export of goods, software, technology and technical data and services, as well as those regarding embargoes, boycotts and other economic sanctions. Trade controls may also apply to any import or export activity, including the transmission of electronic data. Further, certain government economic sanctions can restrict us from engaging in trade with specific persons, entities and countries. These laws and regulations are complex and change periodically.

Anti-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. Please exercise caution when dealing with unusual or suspicious transactions.

Business Intelligence:

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

Gaining publicly available information about competitors and their goods and services is entirely proper and regularly practiced throughout our industries. The process of gaining information, however, must be legal and ethical. Confidential IP belonging to any supplier, customer, competitor or business ally may not be sought or used. 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, an employee may have or be offered access to the confidential information of a competitor or other company. Unless it is clear that the disclosure of such information is authorized by the competitor or other company, the offer should be declined or the material returned, if already received, and no copies should be made or retained. Information about a competitor or another company should be treated with the same respect that we would desire others to use upon encountering Company 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 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.