

## **Ball Corporation Slavery and Human Trafficking Statement**

### **Introduction**

This Slavery and Human Trafficking Statement, dated as of July 29, 2020, is presented to comply with the UK Modern Slavery Act of 2015 (the “UK Act”) and the California Transparency in Supply Chains Act of 2010 (the “California Act”). The UK Act and the California Act require companies to make certain disclosures regarding their efforts to eliminate slavery and human trafficking from their supply chains.

### **Organizational Structure and Supply Chain**

Ball Corporation supplies innovative, sustainable packaging solutions for beverage and household products customers throughout the world, as well as aerospace and other technologies and services primarily for the U.S. government. Ball’s principal products include metal beverage and aerosol packaging, as well as aerospace technologies and components.

Ball has a varied and diverse supply base. Ball entities source supplies world-wide through various supply chains, including raw materials for our products; distribution; procurement of equipment; facility construction; sales, marketing and information technology goods and services; as well as other goods and services integral to our business. We expect that our business partners will uphold our values and comply with our Supplier Guiding Principles, which prohibit forced labor, slavery and human trafficking within their operations and their supply chains. Our Supplier Guiding Principles are discussed further below.

### **Human Rights Policies and Internal Accountability**

Ball has established policies to support our commitment to treat people with dignity and respect. These policies further the protection of human rights by prohibiting slavery and human trafficking, and they address noncompliance by employees and vendors working with and for us.

Ball’s Human Rights Policy sets forth our commitment as an international company to respect, protect, and safeguard human rights in the workplace. Ball endorses the principles set out in the Universal Declaration of Human Rights and the International Labour Organization, which are based on respect for the dignity of the individual without distinction of any kind. Our policy outlines Ball’s commitment to protecting the human rights of our employees; to avoid indirect involvement in human rights abuses through our supply chain; and to respect human rights in the local communities in which we operate. The Human Rights Policy specifically prohibits child, forced or compulsory labor, servitude, slavery and human trafficking.

Ball's Child and Forced Labor Policy is to stringently adhere to all regulations and laws related to child labor laws and forced or compulsory labor. Ball will not employ individuals under the age of 18 in a manufacturing environment, or in any setting deemed hazardous by the U.S. Fair Labor Standards Act, or other national equivalent, unless such employment meets apprenticeship program requirements that comply with local laws, which may allow for employment of apprentices under the age of 18. Persons under the age of 16 will not be employed in any capacity.

Ball's Corporate Compliance Policy sets forth Ball's policy to comply with all laws, which including laws related to slavery and human trafficking. Employees may report potential compliance violations to a third party compliance hotline, Legal, Human Resources, their manager, or any other member of management. The hotline increases internal accountability by enabling employees to report possible violations anonymously, either by calling the specified numbers or by an online report. Hotline access information is displayed on posters in our facilities and information is also available to employees on our company portal.

Ball's [Business Ethics Code of Conduct](#) (the "Code of Conduct") sets forth our expectations of the ethical business conduct of our employees. The Code of Conduct reinforces the fundamental message that Ball is committed to conducting all of our affairs using the highest ethical standards and in compliance with all laws, rules, regulations, policies and procedures applicable to Ball's business operations worldwide. The Code of Conduct specifically sets out our zero tolerance policy regarding child and forced labor and human trafficking in our own business, as well as in our supply chain.

The Ball Corporation Executive Officers and Board of Directors Business Ethics Statement establishes Ball's tone from the top, emphasizing our commitment to compliance with all applicable laws and regulations, which includes all laws and regulations pertaining to human rights.

### **Due Diligence and Verification**

Ball's Supplier Guiding Principles, included in our standard supply agreements, require our suppliers to comply with all applicable laws, rules, and regulations. This policy also sets forth our expectation that suppliers provide equitable and safe working environments, adhere to best practices related to legal working age and unlawful abuse, and engage in no forced labor, slavery, servitude, human trafficking, or unlawful discrimination. Suppliers are expected to demonstrate compliance with these Supplier Guiding Principles at Ball's request. If Ball becomes aware that a supplier is not in compliance with our Supplier Guiding Principles, the action or inaction of the supplier is reviewed by the company, and may lead to corrective measures, including reconsideration of our commercial relationship with the relevant supplier.

## **Certification**

We ask our direct suppliers to certify that the materials in their products comply with the laws and regulations of the countries where they are sold, including those related to the prohibition of forced labor and human trafficking. This certification is included as an exhibit to our supply agreements and is re-certified when contracts are renewed.

## **Audits**

We do not at this time have an internal or third-party plan for auditing our suppliers to evaluate their compliance with sustainability and social responsibility goals, including those related to human trafficking and slavery.

## **Identification of Risk and Training**

Identification of risk related to human rights violations depends largely on our employees who have the direct relationships where these practices are likely to occur. Ball conducts e-learning as part of its overall compliance program, and this e-learning module includes a module on our Code of Conduct and other policies. The Code of Conduct e-learning includes employee certification to Ball's Code of Conduct and selected policies.

Employees are selected for this training using a risk-based approach. In 2017, the selected employee population was expanded to cover a broader cross section of the Company, and this population was expanded again in 2019. New employees that meet the risk-based criteria also receive the e-learning upon hire. The long-term goal is for all Ball employees to certify that they understand and comply with our Code of Conduct, among other Ball policies. In 2019, over 95% of assigned employees completed the training, and the availability of these training courses in fourteen languages reflects our commitment to broad adherence. In addition to e-training, we conduct live compliance training sessions for key employees. Some of the live trainings include material on human trafficking and modern slavery.

We will continue to monitor compliance with our policies, including through the use of the compliance hotline, investigate any possible violations, and continue our activities to increase awareness.

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By: John Hayes

Title: Chairman, Board of Directors