

Ball Corporation Forced Labour and Child Labour Statement

Introduction

This Forced Labour and Child Labour Statement, dated May 31, 2024, is presented by Ball Advanced Aluminum Technologies Holding Canada Inc., and Ball Packaging Products Canada Corp., (together, the “Reporting Entities”) for their respective financial years ending on December 31, 2023 to comply with the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Modern Slavery Act”). The Modern Slavery Act requires companies to make certain disclosures regarding their efforts to prevent and reduce forced labor and child labor from their supply chains.

Organizational Structure and Supply Chain

Ball Corporation (hereinafter “Ball” or the “Company”) supplies innovative, sustainable packaging solutions for beverage and household products customers throughout the world. Ball’s principal products include metal beverage and aerosol packaging. The Reporting Entities each operate a manufacturing facility for such packaging solutions in Ontario and Quebec, respectively, and Ball’s policies and procedures with respect to the matters addressed by this report apply equally to the Reporting Entities.

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 Global Supplier Code of Conduct (the “Supplier Code”), which prohibit forced labor, slavery and human trafficking within their operations and their supply chains. Our Supplier Code is 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, the United Nations Global Compact, 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, the legal department, human resources department, 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 internal 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

In 2023, Ball's Supplier Guiding Principles were substituted with the [Global Supplier Code of Conduct](#). This document was created to reflect overall expectations and obligations when conducting business with Ball. Ball's Supplier Code, which is now included in our standard supply agreements, requires our suppliers to comply with all applicable laws, rules, regulations, and orders of all relevant bodies in the performance of their businesses. This document 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 the principles set forth in the Supplier Code at Ball's request. If Ball becomes aware that a supplier is not in compliance with our Supplier Code, the Company reviews the action or inaction of the supplier, and may lead to corrective measures, including reconsideration of our commercial relationship with the relevant supplier.

Certification

Ball asks its 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 Ball's supply agreements and is re-certified when contracts are renewed.

Audits

Ball does not at this time have an internal or third-party plan for auditing Ball 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 direct relationships where these practices are likely to occur. Ball conducts computer-based training as part of its overall compliance program, and this training 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 is regularly reevaluated and expanded.

New employees that meet the risk-based criteria also receive 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. By the end of 2022, the completion rate for the Code of Conduct e-Learning was over 98%, including new hires for the period. The availability of these training courses in eighteen languages reflects our commitment to broad adherence. In addition to computer-based 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 the use of the compliance hotline, investigate any possible violations, and continue our activities to increase awareness.

Attestation

This report was approved by the board of directors of each of the Reporting Entities pursuant to Section 11(4)(a) of the Canada Act.



By: Hannah Lim-Johnson

Title: President, Board of Directors: Ball Advanced Aluminum Technologies Holding Canada Inc., and Ball Packaging Products Canada Corp.