Ball Corporation
Business Ethics Code of Conduct
WHO WE ARE

Proud of our rich history, we recognize that the whole of our Company is greater than the sum of its parts. Most importantly, we believe in our people, our culture and our ability to deliver value to all our stakeholders. Though we encourage and embrace our diversity of thought, business, location and language, we are “One Ball,” valuing:

UNCOMPROMISING INTEGRITY
We will not risk damaging our reputation for any reason as we continue to build on our heritage of ethics, respect and stewardship by treating stakeholders the way we would like to be treated.

BEING CLOSE TO OUR CUSTOMERS
We have a total commitment to being close to our customers and understanding their needs and future direction.

BEHAVING LIKE OWNERS
By behaving as true owners of our business, we – as one Ball – deliver superior results.

FOCUSING ON ATTENTION TO DETAIL
By managing our operations with relentless attention to detail, we help create a great business that consistently delivers superior value.

BEING INNOVATIVE
We strive to be innovative in our processes, our products and the way we conduct business so we can best serve our customers and become a truly sustainable enterprise.
Dear Ball Employee:

Throughout our over 135-year history, integrity has always been a key component of “who we are” at Ball Corporation. Ball, including its subsidiaries and affiliates worldwide, continues to maintain its strong commitment to sound business ethics. Each year our core purpose and values are published in Ball’s Annual Report to publicly state the Company’s continuing commitment to business ethics. Our core purpose is to add value for all of our stakeholders by providing quality products and services to customers, an attractive return on investment to shareholders and a meaningful work life for employees. Our core values are uncompromising integrity, being close to our customers, behaving like owners, focusing on attention to detail and being innovative. As we strive to make Ball a more successful and sustainable enterprise, our business activities should always be guided by these core values.

As an international organization, Ball operates in a business environment that includes laws that have become increasingly complex. The penalties that may be assessed against the Company and individual employees for violating these laws are significant. Consequently, we believe it is important that you review the Ball Business Ethics Code of Conduct, which serves as a good reminder of Ball’s expectations of ethical business conduct. As a Ball employee, it is your ethical actions and behaviors that are vital to our continued, shared success.

We are proud of our long corporate history, our culture of ethical behavior and our record of corporate compliance. We view our compliance program as an opportunity to reaffirm the values which have created that record. Please review this material in that spirit.

John A. Hayes
Chairman, President and
Chief Executive Officer
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INTRODUCTION

The Ball Business Ethics Code of Conduct applies our corporate values to the day-to-day business situations we face worldwide. As Ball 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 identify common compliance issues and 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 contact your supervisor or the Law Department.

Following the spirit of the Code and our policies is critical to Ball’s continued success. Our reputation depends on the actions and decisions we make every day. By doing all we can to act ethically and legally, we will continue 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 50 percent or less Company owned joint ventures (with respect to Ball’s operating responsibilities and any Ball appointed directors, officers and employees). Further, all Ball business partners, including suppliers, agents and vendors, should strive 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 are required to conduct the business affairs of Ball in a lawful and ethical manner. Ask yourself the following questions when unsure how to proceed in a particular situation:

- Is my decision and proposed conduct lawful?
- Is my decision and proposed conduct consistent with the Code and our policies?
- Am I certain my decision and conduct will have no appearance of impropriety?
- Does my decision or conduct feel right?
- Could I defend my action to the public?

If you cannot answer “yes” to any of the above questions, consider making another choice or speak with your supervisor or the Law Department about how to proceed.
OUR EXPECTATIONS

UNDERSTANDING OUR 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.

Many Ball policies can be found on BallPortal using the Search/Go function. Type “Ball Corporation Policy Manual,” click “GO” and then click on “Policies.”

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’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.

For more information, please refer to the Personal Conduct and Discipline policy.
ADDRESSING OUR QUESTIONS & CONCERNS

NO RETALIATION AT BALL
To protect us and to encourage open communication, Ball maintains a policy of no retaliation for good faith use of the Compliance Hotline 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 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
- Law Department
- Business Unit Compliance Focal Point
- Business Unit Executive
- Compliance Hotline at www.ballcompliancehotline.com or the phone numbers included on the following page
- Human Resources Representative
- Environmental, Health and Safety Department
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’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 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.

Our Company will never condone any form of retaliation because of a good faith report.

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**COMPLIANCE HOTLINES**

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<thead>
<tr>
<th>Country</th>
<th>Phone Number</th>
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<tbody>
<tr>
<td>United States</td>
<td>1-800-270-2879</td>
</tr>
<tr>
<td>Ball Corporation</td>
<td>1-303-939-6777</td>
</tr>
<tr>
<td>Ball Aerospace</td>
<td>0800-966-1246</td>
</tr>
<tr>
<td>Argentina</td>
<td>0800-802298</td>
</tr>
<tr>
<td>Brazil</td>
<td>0-800-020-3400</td>
</tr>
<tr>
<td>Canada</td>
<td>1-800-269-8163</td>
</tr>
<tr>
<td>Chile</td>
<td>800-914-313</td>
</tr>
<tr>
<td>China</td>
<td>400-120-9042</td>
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<tr>
<td>Czech Republic</td>
<td>800-810-915</td>
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<tr>
<td>Denmark</td>
<td>8082-0147</td>
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<tr>
<td>Egypt</td>
<td>0800-000-9377</td>
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<tr>
<td>Finland</td>
<td>0800-07-636</td>
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<tr>
<td>France</td>
<td>0805-080245</td>
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<tr>
<td>Germany</td>
<td>0800-180-0602</td>
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<tr>
<td>Guatemala</td>
<td>502-22296459</td>
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<td>Hong Kong</td>
<td>800-906-062</td>
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<td>India</td>
<td>91-11-71279029</td>
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<td>Ireland</td>
<td>1-800-904-178</td>
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<td>Italy</td>
<td>800-788-058</td>
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<td>Mexico</td>
<td>01-800-681-6521</td>
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<td>Myanmar</td>
<td>720-514-4400</td>
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<td>Netherlands</td>
<td>0-800-022-1241</td>
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<td>507-8365624</td>
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<td>48-222922675</td>
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<td>Russia</td>
<td>8-800-100-6294</td>
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<td>Saudi Arabia</td>
<td>00-966-8111000237</td>
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<td>Serbia</td>
<td>0800-190-162</td>
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<tr>
<td>Spain</td>
<td>900-839195</td>
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<tr>
<td>Sweden</td>
<td>020-888-506</td>
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<td>Switzerland</td>
<td>0800-321-013</td>
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<td>Turkey</td>
<td>90-212-8882447</td>
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<tr>
<td>United Arab Emirates</td>
<td>8000-3570-2714</td>
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<tr>
<td>United Kingdom</td>
<td>0-808-189-1083</td>
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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 offers employee placement, transfer, promotion, compensation and other advancement opportunities to the most qualified individuals, regardless of any protected characteristics.

For more information, please refer to the Equal Employment Opportunity and Affirmative Action policy.

ANTI-HARASSMENT
At Ball, we don’t 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

For more information, please refer to the Anti-Harassment and Retaliation policy.
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. 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.

For more information, please refer to the Disclosure of Personal Information policy.

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.

For more information, please refer to the Child and Forced Labor policy and the Human Rights policy.
WORKPLACE SAFETY AND HEALTH
Ball 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.

For more information, please refer to the Industrial Hygiene policy.

VIOLENCE AND WEAPONS IN THE WORKPLACE
We deserve to work in an environment that is free from violence and threatening behavior. Ball 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.

For more information, please refer to the Workplace Threats and Violence policy.

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’s business interests.

For more information, please refer to the Substance Abuse in the Workplace policy.

Ball views health and safety as one of its most important business priorities.
PROTECTING OUR COMPANY

CONFLICTS OF INTEREST
As Ball 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.

Some common examples of a conflict of interest include:

• Having a financial interest in a competitor or other business partner that could be perceived to adversely influence the employee’s judgment
• Associating with a competitor company as an employee, consultant or substantial shareholder
• Becoming an employee of any other company while still a Ball employee
• Having a relationship with an outside customer, supplier or other company or activity that reflects adversely on the integrity or reputation of Ball
• Using Company confidential information for personal benefit or for the benefit of others
• 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
• Supervising or having direct decision making authority over a family member or equivalent person

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

For more information, please refer to the Conflict of Interest policy.
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 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 and business unit 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.

For more information, please refer to the Records Management policy.

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.

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

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 raise his suspicions immediately. 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.
PROTECTING OUR COMPANY’S INFORMATION

INSIDER TRADING
Ball employees may periodically have access to material, nonpublic (commonly called “inside”) information about the Company or other companies with which we transact business that is not available to people outside our Company. As Ball employees, we must not use inside information gained through working at the Company to influence our own or anyone else’s investment decisions to buy or sell Ball stock or bonds or the stock or bonds of any other company with which Ball does business.

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

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 the Company; or other significant business transactions that are material to the Company.

We should be careful to not pass on inside information to anyone (commonly called “tipping”), including family and friends, who could then inappropriately use or disclose the information.

As Ball employees we must not use inside information to influence our own or anyone else’s investment decisions.
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’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.

For more information, please refer to the Confidentiality policy.

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 okay?

A: No. If Greta knows there is Company confidential information on the laptop she should immediately inform the Law Department, her regional information technology department and her supervisor to report the incident.
PHYSICAL PROPERTY
Every Ball 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’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 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.

For more information, please refer to the Appropriate Use policy and other Information Technology policies.

Email, instant messages and text messages should be composed with the same care we take in composing any other Company document.
SOCIAL MEDIA
Ball 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 knowledgeably 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.

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.

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 supervisor know about the statements.

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 Corporate Communications Department or Investor Relations.

For more information, please refer to the Public Relations policy and the Public Affairs policy.

We must not communicate on behalf of our Company, even if the statement is online.
INTERACTING WITH OUR CUSTOMERS, SUPPLIERS & OTHER BUSINESS PARTNERS

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. Among other things, 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 given or received with the intent of influencing a business decision.

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
- 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 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 are 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.

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

**QUESTION & ANSWER**

**Q:** Phillip, who works for a supplier to Ball, 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, it could be, or appear to be, a gift intended to 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 Law Department or her supervisor for guidance.
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 careful when engaging these third parties and must monitor their activities 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 who bribes or accepts bribes on our behalf.

For more information, please contact the Law Department or refer to the Foreign Corrupt Practices/Global Anti-Corruption policy.

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 parties have been followed. If there are any questions about engaging third parties or actions of third parties, please contact the Law Department.

We do not solicit or accept bribes for ourselves or on behalf of the Company, nor give or receive kickbacks.
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 “bid rigging”).

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.

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 Law Department or her supervisor.
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.

Our Company strives to be a leader in environmental accountability.
COMMUNITY INVOLVEMENT INCLUDING 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 will 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 six corporate sustainability priorities: innovation, operations, talent management, recycling, supply chain and community. 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. For more information, you may 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 contribute to our sustainability performance.

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

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

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.

For more information, please refer to the Export and Import Compliance policy.
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. For example, 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.