

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

BALL AEROSPACE & TECHNOLOGIES CORPORATION

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	3/8
2. Internal Controls	6	1/12
3. Support to Employees	7	2/14
4. Conflict of Interest	4	3/8
5. Customer Engagement	7	3/14
6. Supply Chain Management	5	1/10
7. Agents, Intermediaries and Joint Ventures	10	0/20
8. Offsets	4	0/8
9. High Risk Markets	4	3/8
10. State-Owned Enterprises	0	N/A
TOTAL		16/102
BAND		F

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
<p>The company's leadership endorses its Business Ethics Code of Conduct, which outlines its anti-bribery and corruption commitment.</p> <p>However, the company receives a '1' because its leadership does not explicitly mention bribery and corruption in their statement.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.3] A MESSAGE FROM JOHN A. HAYES 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.</p> <p>John A. Hayes</p> <p>Chairman, President and Chief Executive Officer</p> <p>[p.18] 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.</p> <p>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.</p> <p>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.</p> <p>For more information, please contact the Law Department or refer to the Foreign Corrupt Practices/Global Anti-Corruption policy.</p> <p>[2] Business Ethics Code of Conduct (Webpage) Accessed 13/06/2019 https://www.ball.com/codeofconduct BUSINESS ETHICS CODE OF CONDUCT</p> <p>Throughout our more than 138-year history, integrity has always been a key component of "who we are" at Ball Corporation. Ball employees are proud of our Company's culture of ethical behavior and our record of corporate compliance. The Ball <i>Business Ethics Code of Conduct</i> applies the Company's corporate values to the day-to-day business situations our employees face worldwide. At Ball, we believe compliance is more than simply obeying the law and that integrity and ethical conduct are just as important.</p>

The Code is designed to identify common compliance issues and to provide clear guidance and resources to help Ball employees make the right decisions. However, because the Code cannot anticipate all the issues employees might face, if employees have any questions about the Code or about a business ethics concern, they should contact their supervisor or the Law Department. At Ball, we are committed to conducting all of our business affairs using high ethical standards and in compliance with all laws, rules, regulations and Company policies.

[6] Ethics and Compliance Governance (Webpage)

Accessed 03/07/2019

<https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance>

ETHICS AND COMPLIANCE

Our company culture has always been based on the highest level of integrity and ethical conduct. Integrity is one of Ball's core values and most important cultural assets. We will not compromise our integrity or risk damage to our reputation for financial gain or for any other reason.

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
1
Comments
<p>The company publishes an explicit anti-bribery and corruption policy, which makes specific reference to the prohibition of bribery, payments to public officials and commercial bribery. This policy applies to all employees and board members, including those of subsidiaries and controlled entities.</p> <p>However, the company receives a score of '1' because its policy makes no specific reference to facilitation payments. It is also unclear whether the company's policies apply to non-executive and independent directors.</p>
Evidence
<p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance ETHICS AND COMPLIANCE</p> <p>Our company culture has always been based on the highest level of integrity and ethical conduct. Integrity is one of Ball's core values and most important cultural assets. We will not compromise our integrity or risk damage to our reputation for financial gain or for any other reason.</p> <p>To ensure we act with integrity at all times, all Ball employees are required to understand and follow Ball's corporate compliance policies and the Business Ethics Code of Conduct. Our extensive framework of policies and management systems is well established and continues to evolve as we face new challenges. For example, we established a new company-wide human rights policy in 2013 to ensure that we foster and maintain a responsible and safe work environment for our employees and in our supply chain.</p> <p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p>[p.2] 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.</p> <p>[p.18] 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.</p> <p>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.</p> </p>

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.

[4] Ball Corporation Corporate Governance Guidelines (updated 2018) (Webpage)

Accessed 13/06/2019

<http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govguidelines>

9. Ethical Conduct of Board members. Members of the Board will comply with the Ball Corporation Executive Officers and Board of Directors Business Ethics Statement. Directors who are also employees of the Corporation will also comply with the Business Ethics guidelines of the Corporation for employees.

Gross misconduct

Gross misconduct is serious misconduct which may lead to summary dismissal (dismissal without notice or pay in lieu of notice) for the first offence. In cases of alleged gross misconduct we reserve the right to suspend the employee (on full pay) and carry out an investigation. On completion of the investigation and the full disciplinary procedure, the company may find that gross misconduct has occurred and decide to dismiss without notice or pay in lieu of notice.

The following are examples of behaviour which fall within the definition of 'gross misconduct':

- [...]
- theft, fraud, accepting or offering a bribe, falsification of company records or any dishonesty involving the company, its employees, customers or authorised visitors, or attempts to commit such offenses.
 - deliberate and serious breach of any of our company policies

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
1
Comments
<p>There is evidence that the company's Nominating/Corporate Governance Committee oversees the company's anti-bribery and corruption programme, contained within the company's ethics and compliance programme. The company states that the committee provides oversight of the programme.</p> <p>However, the company receives a score of '1' because there is no clear evidence that the committee reviews reports from management or the results of internal and external audits relating to the company's anti-bribery and corruption policies and procedures. There is also no clear evidence that the committee has the authority to require that changes are made.</p>
Evidence
<p>[7] Nominating/Corporate Governance Committee Charter (Document) Accessed 03/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTY3NjV8Q2hpbGRJRJD0tMXxUeXBIPtM=&t=1 [p.1] III. Responsibilities and Duties The Committee's role is generally one of oversight and it recognizes that the Board is responsible for the selection of and approval of Board nominees and the conduct of the annual evaluation of Board performance. In carrying out its responsibilities the Committee and its members are not providing any expert or special assurance as to Director, committee or Board performance. The Committee may request or permit any other Director, or any officer or employee of the Corporation, to attend a meeting of the Committee or to meet with any members of the Committee.</p> <p>The following matters comprise the recurring activities of the Committee in carrying out its functions. The responsibilities and duties of a member of the Committee are in addition to his or her duties as a member of the Board.</p> <p>[p.2] 8. Develop and recommend to the Board ethical standards and ethics and legal compliance requirements for Directors and executive officers of the Corporation.</p> <p>9. Develop, recommend and oversee a Board, Board committee and Director evaluation process.</p> <p>10. Review and report to the Board the status of the Corporation's compensation program for Directors of the Corporation and maintain oversight of any Director compensation-related risks. Any changes in Director compensation should come upon the recommendation of the Committee, but with final approval by the Board.</p> <p>11. Provide oversight with respect to sustainability and social concerns, as well as related party transactions and conflicts of interest, and review periodically the activities of the Corporation in support of those areas.</p> <p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance Accountability for our sustainability performance is monitored at various levels of the organization. It is overseen by the Nominating/Corporate Governance Committee, a committee of Ball Corporation's board of directors chaired by a non-executive board director of Ball.</p> <p><u>Ethics and Compliance</u> Ball's Corporate Compliance Program, supported by a Corporate Compliance Committee, was established to assist operating and staff organizations achieve compliance with all regulations. Key compliance issues involve employment practices; environmental protection; workplace safety; product quality; customer, supplier or government relations; use of confidential, proprietary, technical or business information; accurate reporting and record keeping; anti-competitive/unfair trade practices; foreign corrupt practices and anti-bribery avoidance;</p>

securities law compliance; export controls and trading restrictions; and other actions regulated by law or corporate policy.

The company has numerous other compliance and regulatory policies in place to ensure employees act in full accordance with appropriate laws and regulations such as child and forced labor, environmental, export and import compliance and foreign corrupt practices

[4] Ball Corporation Corporate Governance Guidelines (updated 2018) (Webpage)

Accessed 13/06/2019

<http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govguidelines>

4. Board Committees.

The Board shall have at least three committees. The committees shall include the Nominating/Corporate Governance Committee, the Human Resources Committee and the Audit Committee. These committees will be composed only of Independent Directors who meet the requirements of the NYSE and/or applicable law for that committee and have a publicly available written charter reflecting the duties and responsibilities of the committees. The charters must reflect the committees' purpose, duties and responsibilities, including oversight of specific risk areas, require an annual review of the committee by the Board, provide for access as required to expert advisors and contain other provisions mandated by the NYSE or the law, including as to the number of public company boards and/or audit committees on which directors may serve. The Board has also determined that a Finance Committee is appropriate. The Finance Committee will also have a written charter that reflects its duties and responsibilities. The Board may constitute other committees of the Board that it determines are appropriate. The chairs of committees will be elected by the Board.

[5] Audit Committee Charter 2018 (Document)

Accessed 13/06/2019

<http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjIzODI3fENoaWxkSUQ9LTF8VHlwZT0z&t=1>

Ball Corporation I. Purpose The primary purposes of the Audit Committee (the "Committee") are to assist the Board of Directors (the "Board") in fulfilling its responsibility with regard to (a) management's conduct and the integrity of Ball Corporation's (the "Corporation") financial statements, (b) the Corporation's compliance with legal and regulatory requirements, the accounting policies and the system of internal control over financial reporting, disclosure controls and procedures, (c) the performance of the Corporation's outside auditor and internal audit department, (d) the outside auditor's qualifications and independence, (e) preparation of the report required by the Securities and Exchange Commission ("SEC") proxy rules, (f) carrying out the responsibilities required of Audit Committees by the New York Stock Exchange ("NYSE") and the SEC, and (g) oversight of the enterprise risk management process and future risks affecting the Corporation, as well as legal and regulatory compliance, and the Corporation's Code of Conduct and Tone at the Top. The Committee shall review the adequacy of this Charter on an annual basis.

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
0
Comments
There is no evidence that the company has a specific managerial-level employee who holds ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme.
Evidence
No evidence found.

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
0
Comments
There is no evidence that the company has a formal risk assessment procedure which is used to inform its anti-bribery and corruption programme.
Evidence
<p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance RISK MANAGEMENT</p> <p>We systematically identify and assess risks in all of our businesses so we can develop management plans that encompass major risks, including supply chain, commodity and currency volatility, human capital, financial risk and legislative action. Sustainability issues addressed within this framework include risks related to natural resources, climate change, human rights and regulations related to packaging and packaging waste.</p> <p>ETHICS AND COMPLIANCE</p> <p>Our company culture has always been based on the highest level of integrity and ethical conduct. Integrity is one of Ball's core values and most important cultural assets. We will not compromise our integrity or risk damage to our reputation for financial gain or for any other reason.</p> <p>To ensure we act with integrity at all times, all Ball employees are required to understand and follow Ball's corporate compliance policies and the Business Ethics Code of Conduct. Our extensive framework of policies and management systems is well established and continues to evolve as we face new challenges. For example, we established a new company-wide human rights policy in 2013 to ensure that we foster and maintain a responsible and safe work environment for our employees and in our supply chain.</p> <p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.5] COMPLIANCE RESOURCES AND HOTLINE INFORMATION</p> <p>[p.6] 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.</p> <ul style="list-style-type: none"> For more information please refer to the Corporate Compliance Policy

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
0
Comments
Although there is some evidence that the company reviews its anti-bribery and corruption programme, it does not provide sufficient detail to receive a score of '1', and the company does not specify how frequently it conducts these reviews. It is also unclear if the review findings are presented to the board or used to update the programme.
Evidence
<p>[5] Audit Committee Charter 2018 (Document) Accessed 13/06/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjIzODI3fENoaWxkSUQ9LTF8VHlwZT0z&t=1 [p.4] 4. With regard to other matters, the Committee shall:</p> <p>(a) oversee the Corporation's compliance with legal and regulatory requirements by (i) making inquiries of the Chair of the Corporate Compliance Committee, the General Counsel, and senior executive officers regarding the company's ethical standards, utilization of the Corporation's hotline reporting system, and the compliance by the company and its officers, employees and directors with the ethical standards and the law and by (ii) meeting annually with the General Counsel to review legal matters, including any matters that may have a material impact on the financial statements of the Corporation;</p> <p>[7] Nominating/Corporate Governance Committee Charter Accessed 03/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTY3NjV8Q2hpbGRJRDR0tMXxUeXBIPtM=&t=1 [p.2] 8. Develop and recommend to the Board ethical standards and ethics and legal compliance requirements for Directors and executive officers of the Corporation.</p> <p>[...]</p> <p>11. Provide oversight with respect to sustainability and social concerns, as well as related party transactions and conflicts of interest, and review periodically the activities of the Corporation in support of those areas.</p> <p>[p.3] 15. Perform an annual self-evaluation of the performance of the Committee and report annually to the Board concerning the performance of the Committee and discuss any needed action items for the Committee.</p>

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
1
Comments
<p>There is evidence that the company publicly commits to investigating incidents, and that it has specific procedures in place to deal with whistleblowing cases, which stipulates documentation and actions to be taken at each step.</p> <p>However, the company does not cover the whole investigation process from receipt to final outcome, there is no evidence that investigations are handled by an independent team and/or report to an independent board member, and there is no evidence that the company commits to providing whistleblowers with updates on the outcome of investigations. Finally, there is no evidence that summary information is reviewed by a central body on an annual basis.</p>
Evidence
<p>[5] Audit Committee Charter 2018 (Document) Accessed 13/06/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjIzODI3fENoaWxkSUQ9LTF8VHlwZT0z&t=1 [p.4] With regard to other matters, the Committee shall:</p> <p>(b) establish procedures for the receipt, retention, and treatment of complaints regarding accounting, internal control over financial reporting, auditing, ethical or legal compliance matters, including procedures for confidential, anonymous submission by employees of Ball or other interested parties of concerns regarding questionable accounting, auditing, ethical, or legal compliance matters;</p> <p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.5] COMPLIANCE RESOURCES AND HOTLINE INFORMATION</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <p>[p.6] INVESTIGATION OF COMPLIANCE REPORTS</p> <p>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.</p> <p>Our Company will never condone any form of retaliation because of a good faith report.</p> <p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019</p>

<https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance>

Ethics and Compliance

Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies. We have a hotline for employees and external stakeholders to use to report policy violations confidentially and in their own language. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
There is no evidence that the company assures itself of the quality of its internal investigations.
Evidence
No evidence found.

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
0
Comments
There is no evidence that the company's investigative procedure includes a commitment to report material findings of bribery and corruption to the board or to the relevant authorities.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p>[p.4] CONSEQUENCES FOR VIOLATING THE CODE</p> <p>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.</p> <p>[p.11] RESPONDING TO GOVERNMENT AUDITS, INQUIRIES AND INVESTIGATIONS</p> <p>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 the information we need to respond appropriately.</p> <p>[5] Audit Committee Charter 2018 (Document) Accessed 13/06/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjlzODI3fENoaWxkSUQ9LTF8VHlwZT0z&t=1 <p>[p.4] 4. With regard to other matters, the Committee shall:</p> <p>(a) oversee the Corporation's compliance with legal and regulatory requirements by</p> <p>(i) making inquiries of the Chair of the Corporate Compliance Committee, the General Counsel, and senior executive officers regarding the company's ethical standards, utilization of the Corporation's hotline reporting system, and the compliance by the company and its officers, employees and directors with the ethical standards and the law and by</p> <p>(ii) meeting annually with the General Counsel to review legal matters, including any matters that may have a material impact on the financial statements of the Corporation;</p> <p>[7] Nominating/Corporate Governance Committee Charter Accessed 03/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTY3NjV8Q2hpbGRJRD0tMXxUeXBIPtM=&t=1 <p>[p.2] 8. Develop and recommend to the Board ethical standards and ethics and legal compliance requirements for Directors and executive officers of the Corporation.</p> <p>[p.3] 15. Perform an annual self-evaluation of the performance of the Committee and report annually to the Board concerning the performance of the Committee and discuss any needed action items for the Committee.</p> </p></p></p>

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions involving its employees.
Evidence
No evidence found.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
0
Comments
<p>The company states that all employees are required to undertake a compliance verification process, which includes an understanding of the company's anti-corruption and anti-bribery policies. However, it is not clearly stated that employees are required to undertake training on the company's anti-corruption programme.</p>
Evidence
<p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance ETHICS AND COMPLIANCE Our company culture has always been based on the highest level of integrity and ethical conduct. Integrity is one of Ball's core values and most important cultural assets. We will not compromise our integrity or risk damage to our reputation for financial gain or for any other reason.</p> <p>To ensure we act with integrity at all times, all Ball employees are required to understand and follow Ball's corporate compliance policies and the Business Ethics Code of Conduct.</p> <p>Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies. We have a hotline for employees and external stakeholders to use to report policy violations confidentially and in their own language. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.</p>

Question
3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees: a) Employees in high risk positions, b) Middle management, c) Board members.
Score
0
Comments
<p>There is no evidence that the company tailors its anti-bribery and corruption training to employees based on an assessment of their role and exposure to corruption risk. Although the company states that managers and select employees are required to verify understanding of all of the company's business conduct, it is not explicitly clear that this constitutes training.</p>
Evidence
<p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance ETHICS AND COMPLIANCE Our company culture has always been based on the highest level of integrity and ethical conduct. Integrity is one of Ball's core values and most important cultural assets. We will not compromise our integrity or risk damage to our reputation for financial gain or for any other reason.</p> <p>To ensure we act with integrity at all times, all Ball employees are required to understand and follow Ball's corporate compliance policies and the Business Ethics Code of Conduct.</p> <p>Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies. We have a hotline for employees and external stakeholders to use to report policy violations confidentially and in their own language. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.</p>

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
0
Comments
There is no evidence that the company measures or reviews the efficacy of its anti-bribery and corruption communications or training programme.
Evidence
No evidence found.

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
0
Comments
There is no evidence that the company commits to support or protect employees who refuse to act unethically, even when it might result in a loss of business.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.5] ADDRESSING OUR QUESTIONS & CONCERNS NO RETALIATION AT BALL</p> <p>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.</p>

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
<p>The company promotes a clear policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, which applies to all employees across the organisation, including those employed by the group as third parties, suppliers and joint venture partners.</p> <p>However, the company receives a score of '1' because there is no evidence that it assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf</p> <p>[p.2] APPLICABILITY</p> <p>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.</p> <p>[p.3] ADDITIONAL RESPONSIBILITIES FOR SUPERVISORS</p> <p>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:</p> <ul style="list-style-type: none"> • 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. <p>[p.5] NO RETALIATION AT BALL</p> <p>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.</p> <p>[p.15] QUESTION & ANSWER</p> <p>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?</p>

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.

[6] Ethics and Compliance Governance (Webpage)

Accessed 03/07/2019

<https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance>

Ethics and Compliance

Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies. We have a hotline for employees and external stakeholders to use to report policy violations confidentially and in their own language. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
1
Comments
<p>There is evidence that the company has multiple whistleblowing and advice channels, some of which allow for anonymous and confidential reporting. The company also provides channels and resources for employees to receive advice related to anti-corruption and ethics and there is evidence that the company's channels are available to all employees in all countries of operation, in all relevant languages. There is also evidence that the company maintains a reporting and advice channel for use by third parties.</p> <p>However, the company receives a score of '1' because it is unclear whether the company has an externally operated whistleblowing or advice channel.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf</p> <p>[p.1] 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.</p> <p>[p.2] 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.</p> <p>[p.3] 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:</p> <ul style="list-style-type: none"> • 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. <p>[p.5] 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:</p> <ul style="list-style-type: none"> • 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

COMPLIANCE HOTLINES	
United States	
Ball Corporation	1-800-270-2879
Ball Aerospace	1-303-939-6777
Argentina	0800-666-1246
Austria	0800-802298
Brazil	0-800-020-3400
Canada	1-800-269-8163
Chile	800-914-313
China	400-120-9042
Czech Republic	800-810-915
Denmark	8082-0147
Egypt	0800-000-9377
Finland	0800-07-636
France	0805-080245
Germany	0800-180-0602
Guatemala	502-22296459
Hong Kong	800-906-062
India	91-11-71279029
Ireland	1-800-904-178
Italy	800-788-058
Mexico	01-800-681-6521
Myanmar	720-514-4400
Netherlands	0-800-022-1241
Panama	507-8365624
Poland	48-222922675
Russia	8-800-100-6294
Saudi Arabia	00-966-8111000237
Serbia	0800-190-162
Spain	900-839195
Sweden	020-888-506
Switzerland	0800-321-013
Turkey	90-212-8882447
United Arab Emirates	8000-3570-2714
United Kingdom	0-808-189-1083

- Environmental, Health and Safety Department

[p.6] 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.

[4] Ball Corporation Corporate Governance Guidelines (updated 2018) (Webpage)

Accessed 13/06/2019

<http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govguidelines>

In compliance with NYSE and Securities and Exchange Commission ("SEC") requirements the Corporation established additional means for interested parties to send communications to the Board and selected Committees.

Any interested party may communicate directly with the non-management directors with regard to any matter by writing the Lead Independent Director.

Any interested party, including employees, may report concerns regarding accounting, internal control over financial reporting, disclosure controls and procedures, auditing and legal matters by writing the Chair of the Audit Committee. Anonymous or confidential submissions should be sent by mail.

Any interested party may report concerns regarding the Executive Officers and Board of Directors Business Ethics Statement by writing the Chair of the Nominating/Corporate Governance Committee or the Chairman of the Board as appropriate.

[6] Ethics and Compliance Governance (Webpage)

Accessed 03/07/2019

<https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance>

Ethics and Compliance

Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies. We have a hotline for employees and external stakeholders to use to report policy violations confidentially and in their own language. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible violations.

4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
2
Comments
<p>There is evidence that the company has policies covering actual and perceived conflicts of interest, which apply to all employees and directors, including those employed by subsidiaries and the company's other holdings. The policies cover conflicts of interest concerning the employment of current and former government officials, secondary employment, employee relationships and financial interests. There is also evidence that the company has an internal policy covering conflicts of interest, but this is not publicly accessible.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p>[p.2] APPLICABILITY</p> <p>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.</p> <p>[p.10] PROTECTING OUR COMPANY CONFLICTS OF INTEREST</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <p>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.</p> <p>For more information, please refer to the Conflict of Interest policy.</p> <p>[6] Ethics and Compliance Governance (Webpage) Accessed 03/07/2019 https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance ETHICS AND COMPLIANCE</p> <p>[...]</p> </p>

Each year, all managers and other select employees are required to perform an electronic compliance verification for all business conduct (including applicable laws and regulations), anti-corruption and conflict of interest policies.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
0
Comments
There is evidence that the company's Nominating/Corporate Governance Committee is responsible for oversight of conflicts of interest within the organisation. However, the company provides insufficient information regarding its procedures for managing conflicts of interest to receive a score of '1'.
Evidence
<p>[7] Nominating/Corporate Governance Committee Charter Accessed 03/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTY3NjV8Q2hpbGRJRD0tMXxUeXBIPtM=&t=1 [p.1] III. Responsibilities and Duties</p> <p>The Committee's role is generally one of oversight and it recognizes that the Board is responsible for the selection of and approval of Board nominees and the conduct of the annual evaluation of Board performance. In carrying out its responsibilities the Committee and its members are not providing any expert or special assurance as to Director, committee or Board performance. The Committee may request or permit any other Director, or any officer or employee of the Corporation, to attend a meeting of the Committee or to meet with any members of the Committee.</p> <p>The following matters comprise the recurring activities of the Committee in carrying out its functions. The responsibilities and duties of a member of the Committee are in addition to his or her duties as a member of the Board.</p> <p>[p.2] 11. Provide oversight with respect to sustainability and social concerns, as well as related party transactions and conflicts of interest, and review periodically the activities of the Corporation in support of those areas.</p>

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
1
Comments
<p>There is evidence that the company has a policy that addresses the risks associated with the employment of public officials.</p> <p>However, the policy does not include any specific controls to assess and regulate the employment of current or former public officials, such as requiring senior approval for the initiation of employment discussions, undertaking a conflict of interest review and imposing restrictions on activities if risks are identified, or stipulating a cooling-off period of 12 months.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.10] PROTECTING OUR COMPANY CONFLICTS OF INTEREST</p> <p>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:</p> <p>[...]</p> <ul style="list-style-type: none"> 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

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company reports details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
The company operates a political action committee and therefore receives a score of '0'.
Evidence
<p>[10] Political Contributions Policy (Document) Accessed 03/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NDE0NzI5fENoaWxkSUQ9LTF8VHlwZT0z&t=1&cb=636807526571009965 [p.1] Ball Corporation – Policies on Political Contributions and Political Action of Employees</p> <p>Ball Corporation ("Ball" or the "Company") has since 1975 maintained a long-standing policy that prohibits the use of its corporate funds for political purposes, to the extent such use is prohibited by applicable laws or regulations. Ball's policy also prohibits exercise of any corporate action, or action by corporate officials, direct or implied, that infringes the right of any employee individually to decide whether, to whom, and in what amount he or she will make personal political contributions.</p> <p>Contributions of Company funds or services for electoral purposes are not allowed. This includes contributions to candidates, parties, and committees, 527 groups, ballot initiatives, and 501(c)(4) "social welfare" organizations. Ball Corporation maintains an independent Political Action Committee which may accept contributions from certain classifications of employees, as provided by law.</p> <p>Employees of Ball who are involved in political activity must do so as private citizens. There must be no connotation that the views expressed or the positions taken by employees are condoned, approved or authorized by the Company. Employees shall not contribute corporate funds or corporate services to a public official or a political candidate. Personal correspondence shall not be prepared with corporate resources or using corporate letterhead.</p> <p>[14] Political Action Committee (Webpage) Accessed 05/07/2019 https://goballpac.com/ BALLPAC IS MORE THAN JUST ANOTHER POLITICAL PROGRAM:</p> <p>It's an investment in the future of our employees, our company and our industry. Fully 100% of your contributions go directly to candidates who share our collective vision for the future.</p> <p>WHY DO WE NEED A PAC?</p> <p>BALLPAC HELPS TO TELL OUR UNIQUE STORY.</p> <p>While supporting the campaigns of the best candidates, BallPAC also works to make sure candidates and Congressional members understand our manufacturing business and the important contributions our aerospace business makes to the U.S. government.</p> <p>They need to know about the work we do. Your support of BallPAC makes that possible.</p> <p>WHAT IS A POLITICAL ACTION COMMITTEE?</p>

BALLPAC IS A NONPARTISAN POLITICAL ACTION COMMITTEE (PAC).

It is registered with the U.S. Federal Election Commission (FEC) and allows Ball employees to pool personal, voluntary financial contributions. The contributions are used to support candidates seeking elective office who are proponents of issues important to our employees, our business and our shareholders.

WHO DO WE SUPPORT? BALLPAC SUPPORTS CANDIDATES, NOT POLITICAL PARTIES.

BallPAC contributes on a bipartisan basis based on the candidate's:

- Key leadership and committee assignments critical to our interests
- Representation of a facility or employee center
- Position and voting record on issues of importance

WHAT SHOULD I CONTRIBUTE?

Whether you're contributing already or contributing for the first time, to level the playing field with our industry counterparts, we've established new contribution guidelines based on your leadership role in the company. Our executive team participates at 100% of their recommended level and we encourage you to do the same.

Contributions to BallPAC are not deductible for federal income tax purposes. All contributions to BallPAC are voluntary. You have the right to refuse to contribute without reprisal. Any contribution levels discussed are merely suggestions. You are free to contribute more or less than the guidelines suggest. Ball Corporation will not favor or disadvantage you by reason of the amount of your contribution or a decision not to contribute. Contributions to BallPAC are for political purposes.

[15] BallPAC in Action (Webpage)

Accessed 05/07/2019

<https://goballpac.com/author/ballpacadmin/>

BallPAC contributed \$270,400 to 66 candidates in the House and Senate. We are happy to report that 100% of all supported House candidates—50 in total—were victorious. In addition, 12 of the 16 Senate candidates BallPAC supported were victorious, while 2 retired and 2 were defeated.

BallPAC is a bipartisan committee. Contributions are based on many factors, including: support for policies important to Ball's growth, understanding of Ball's business, and representation of significant employee populations, committee or leadership position, and the current makeup of Congress. BallPAC support in the 2015-16 election cycle was split between members of both major parties, with 74% of contributions favoring Republicans and 26% going to Democratic candidates.

[1] Business Ethics Code of Conduct (updated 2016) (Document)


Accessed 13/06/2019

<https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf>

[p.27] 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.

Question
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?
Score
2
Comments
The company discloses the political candidates that it supports. There is evidence that this information is updated annually.
Evidence
<p>[17] 2016 Contribution Recipients (Webpage) Accessed 05/07/2019 https://goballpac.com/2016-contribution-recipients/</p>  <p>[list continues]</p>
<p>[16] BallPAC - Who Do We Contribute To (Webpage)</p>

Accessed 05/07/2019

<https://goballpac.com/contributions/>



**POLITICAL
ACTION
COMMITTEE**
★ ★ ★ ★ ★ ★ ★ ★

Why a
PAC?

What's a
PAC?

Who Do We
Support?

News

House

★ ★ ★ ★ ★ ★ ★ ★

Robert Aderholt | R-AL-4

Committee : Appropriations

Pete Aguilar | D-CA-31

Committee : Appropriations

Brian Babin | R-TX-36

Committees : Science, Space and Technology

Jim Banks | R-IN-3

Committee : Armed Services Committee

Ami Bera | D-CA-7

Committees : Science, Space and Technology

Don Beyer | D-VA-8

Committees : Science, Space and Technology

Andy Biggs | R-AZ-5

Committees : Science, Space and Technology

Suzanne Bonamici | D-OR-1

Committees : Science, Space and Technology

Kevin Brady | R-TX-8

Facility : Conroe

Committee : Ways and Means

Senate

★ ★ ★ ★ ★ ★ ★ ★

Roy Blunt | R-MO

Committees : Intelligence; Appropriations

John Cornyn | R-TX

Facilities : Conroe, Ft. Worth, Longview

Committees : Intelligence; Finance

Deb Fischer | R-NE

Committees : Armed Services; Commerce, Science and Transportation

Cory Gardner | R-CO

Facilities : Boulder, Broomfield, Golden, Westminster

Committees : Commerce, Science, and Transportation Budget

Martin Heinrich | D-NM

Facility : Albuquerque

Committees : Armed Services; Intelligence

Mazie Hirono | D-HI

Facility : Kapolei

Committees : Armed Services; Energy

Tim Kaine | D-VA

[list continues]

Question
1.1.1. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
0
Comments
There is no clear evidence that the company has a policy and/or procedure covering both charitable donations and sponsorships. The company also does not publish detailed data on its charitable contributions.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.21] COMMUNITY INVOLVEMENT INCLUDING SUSTAINABILITY</p> <p>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.</p> <p>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.</p> <p>[18] Ball Foundation - Funding Guidelines (Webpage) Accessed 05/07/2019 https://www.ball.com/na/vision/sustainability/community/ball-foundation/funding-guidelines The Ball Foundation funds programs that create a positive, measurable impact in four key areas linked to Ball Corporation's business and strategy: STEM education, recycling, and disaster preparedness and relief. Specifically, grants are awarded in the communities in which we operate in the United States.</p> <p>STEM Education: Ball Corporation believes education is vital to social and economic development because it gives people in our communities the knowledge and skills they need to achieve employment and economic security in our rapidly changing, global economy. To help keep communities and business competitive and prosperous, Ball supports formal educational opportunities for K-12 education, higher education, business-education partnerships, and other local needs. The Ball Foundation focuses its education funding the areas of:</p> <ul style="list-style-type: none"> ▪ STEM education with a special focus on K-12 and higher education programs geared towards encouraging and preparing students for careers in engineering. ▪ Diversity: Programs that support diversity by providing opportunities for educational achievement and diverse thought regardless of racial and ethnic background, gender or economic status. <p>Recycling: Recycling is critical to the future of our business, society and planet. Its benefits include saving significant amounts of energy and natural resources. The Ball Foundation supports programs that increase metal packaging recycling rates, improve collection processes and provide education about the benefits of recycling.</p> <p>Community Engagement: An important part of the cultural values of Ball Corporation and The Ball Foundation is to be a good neighbor, corporate citizen and employer of choice in communities where Ball has a presence. The needs in our communities are many; The Ball Foundation focuses on disaster preparedness and relief initiatives.</p> <p>The Ball Foundation funds specific projects and programs rather than sponsorships (i.e., tables, golf tournaments, etc.). Funding to individual schools is limited to higher educational institutions, except when the Foundation matches qualifying contributions made to schools through manufacturing facilities. Ball reserves the right to deny funding to organizations at any time.</p>

WHAT THE BALL FOUNDATION DOES NOT FUND

The Ball Foundation does not support organizations that discriminate against a person or a group on the basis of age, political affiliation, race, national origin, ethnicity, gender, gender identity, disability, sexual orientation or religious belief.

In order to maintain its focus and achieve a greater impact through the use of its funds, the Ball Foundation also will generally not support:

- Individuals
- Religious groups for religious purposes
- Programs targeted for people with specific physical, medical or psychological conditions
- Medical research
- Grant requests for production of audio, film or video
- Grant request for capital campaigns or projects
- Grant requests for museum exhibits or similar displays
- Requests to support travel
- Lobbying, political or fraternal activities
- Organizations not exempt under Section 501(c)(3) of the IRS code or unaccredited public/private schools
- Programs or organizations for which the Ball Foundation is asked to serve as the sole funding source

[19] The Ball Foundation (Webpage)

Accessed 05/07/2019

<https://www.ball.com/na/vision/sustainability/community/ball-foundation>

THE BALL FOUNDATION

The Ball Foundation is the philanthropic arm of Ball Corporation. Grants are awarded to nonprofit organizations to fund programs that create a positive, measurable impact in four key areas linked to Ball's business and strategy: STEM education, recycling and disaster relief. Specifically, grants are awarded in the communities in which Ball operates in the United States.

STEM EDUCATION

The Ball Foundation focuses its education funding on science, technology, engineering and math (STEM) for K-12 and higher education programs geared toward encouraging and preparing students for careers in engineering. Programs include supporting diversity by providing opportunities for educational achievement and diverse thought regardless of racial and ethnic background, gender or economic status.

With the help of the Ball Foundation, hundreds of students participate in STEM-focused activities. These investments include mentoring, hands-on learning opportunities and educational materials for students.

RECYCLING

Recycling is critical to the future of our business, society and planet. Its benefits include saving significant amounts of energy and natural resources. The Ball Foundation supports programs that increase metal packaging recycling rates, improve collection processes and provide education about the benefits of recycling. As an example, the foundation supports The Recycling Partnership, reaching 1.2 million U.S. households to increase recovery of

recyclable materials at the curb.

The Ball foundation also has partnered with Eco-Cycle's Green Star Schools program targeting zero waste in Boulder, Colorado, schools. Up to two-thirds of the discards from each of the Green Star Schools is kept out of landfills. Currently, there are more than 40 schools enrolled in the program teaching nearly 20,000 students and their families the value of zero waste to landfill.

In addition, the Ball Foundation supports Oskar Blues' CAN'd Aid Foundation, in particular their beverage can recycling program, "Crush it Crusade." With the goal of recycling 1 million cans, this program provides assistance to communities and local nonprofit organizations to get away-from-home recycling programs off the ground.

DISASTER RELIEF

It is important to Ball and The Ball Foundation to be a good neighbor, corporate citizen and employer of choice in communities where the company has a presence. The Ball Foundation is a proud partner of the American Red Cross Disaster Responder Program, helping the Red Cross deliver vital relief to people affected by disasters, big and small, across the U.S. and around the world.

Additionally, Ball partners with Oskar Blues' CAN'd Aid Foundation and Miller Coors to provide nearly 1.5 million cans of drinking water to victims of flooding and other natural disasters. Cans filled with drinking water are a perfect option to help people affected by disasters because aluminum beverage cans are transport-efficient, unbreakable, and infinitely recyclable and maintain the high quality of the product inside.

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
0
Comments
There is no evidence that the company has a policy and/or procedure on lobbying.
Evidence
No evidence found.

Question
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?
Score
0
Comments
There is no evidence that the company publishes any information on its lobbying aims, topics or activities.
Evidence
No evidence found.

Question
5.2.3 Does the company publish full details of its global lobbying expenditure?
Score
0
Comments
There is no evidence that the company provides details about its global lobbying expenditure.
Evidence
No evidence found.

5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
1
Comments
<p>There is evidence that the company has a policy and/or procedure on the giving and receipt of gifts and hospitality. The policy covers gifts and hospitality given to and received from government officials.</p> <p>However, the company receives a score of '1' because the policy does not specify financial or proportional limits or different approval procedures for different types of promotional expenses. There is also no evidence that all gifts and hospitality above a certain threshold are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p>[p.16] INTERACTING WITH OUR CUSTOMERS, SUPPLIERS & OTHER BUSINESS PARTNERS GIFTS AND GRATUITIES</p> <p>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:</p> <ul style="list-style-type: none"> • 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 <p>[p.17] 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.</p> <p>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 non-business capacity.</p> </p>

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.

[4] Ball Corporation Corporate Governance Guidelines (updated 2018) (Webpage)

Accessed 13/06/2019

<http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govguidelines>

Conflicts of Interest

Each Executive Officer and Director shall conduct himself or herself with high ethical standards to avoid a conflict of interest with the Corporation or its stockholders.

A conflict of interest, in the broad sense, may arise where an individual's position or responsibilities on behalf of the Corporation present an opportunity for personal gain (including with respect to such person's family members) apart from the normal rewards of employment or service as an Executive Officer or Director of Ball. It may also arise where an individual's personal interests are so inconsistent with the Corporation's interests that the latter become secondary, or otherwise conflict with his or her proper loyalties to the Corporation. Areas which require specific attention are:

- **Gratuities**

Each Executive Officer and Director should not place himself or herself under actual or apparent obligation to anyone by accepting or permitting those close to him/her to accept gifts or other favors where it might appear that they were given for the purpose of improperly influencing the individual in the performance of his/her duties.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
0
Comments
There is no evidence that the company requires the involvement of its procurement department in the establishment and/or oversight of its supplier base.
Evidence
No evidence found.

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
0
Comments
There is no evidence that the company conducts bribery and corruption-based due diligence on its suppliers.
Evidence
<p>[21] Supplier Guiding Principles Accessed 05/07/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball_Supplier_Guiding_Principles.pdf <p>[p.1] <u>Supplier Guiding Principles</u></p> <p>All suppliers must adhere to the following principles:</p> <p>[p.2] 6.) Bribery and Corruption</p> <p>Ball has a strict policy against bribery and corruption. Suppliers shall not make payments or provide entertainment and gifts or anything of value directly or indirectly to government officials or others so as to influence them in the performance or non-performance of their duties or induce them to use their influence or secure any improper advantage or to obtain or retain business for Ball.</p> <p>7.) <u>Demonstration of Compliance</u></p> <p>Suppliers will be expected to certify and demonstrate compliance with these Supplier Guiding Principles at Ball's request.</p> <p>[20] Responsible Sourcing Framework (Webpage) Accessed 05/07/2019 https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework ONBOARDING REQUIREMENTS</p> <p>With our Onboarding Requirements, we communicate and align the way our suppliers consider ESG aspects, and aim to receive written confirmation that responsible business practices are maintained throughout our supply chain. This way, we also ensure that our suppliers abide by all applicable laws and regulations.</p> <p>For example, we require our suppliers to comply with Ball's Supplier Guiding Principles. The principles were developed with input from key customers, suppliers and socially responsible investment analysts, and require that our suppliers certify and demonstrate compliance with them. They cover employment practices, human rights, environment, health and safety, antitrust, bribery and corruption. During the reporting period, Ball provided this document to suppliers and incorporated the principles as part of all new contractual relationships.</p> <p>New contracts also include clauses on human trafficking. Our form supplier agreements require vendors to provide conflict minerals certifications. Ball's Conflict Minerals Policy includes information on how we support laws related to ending the violence and human rights violations in the mining of certain minerals in the Democratic Republic of the Congo and surrounding countries. Our Conflict Minerals Report for the year ended December 31, 2018, details the due diligence we have performed as required in Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.</p> <p>SUPPLIER SUSTAINABILITY PROFILES</p> <p>Supplier Sustainability Profiles are based on media screening, direct dialogue with suppliers and a sustainability self-assessment questionnaire, which we rolled out globally during the reporting period. The 17 questions, covering management systems and transparency, ESG risks, supply chain management and product stewardship, provide a</p> </p>

self-evaluation of each supplier, which populates a supplier scorecard. In 2013, we achieved a 93 percent response rate.

CONTINUOUS IMPROVEMENT

If a supplier scores below expectations, we jointly develop a Continuous Improvement plan. By developing and approving cooperative programs and timetables, both partners can be successful for the long term. Ball may terminate business relations if a supplier violates a fundamental aspect of our requirements and is unwilling to change.

[11] 2018 Sustainability Report (Document)

Accessed 04/07/2019

https://www.ball.com/Ball/media/Ball/Ball2018_SustainabilityReport-Web.pdf

[p.31] ONBOARDING REQUIREMENTS

With our Onboarding Requirements, we communicate and align the way our suppliers consider ESG aspects, and aim to receive written confirmation that responsible business practices are maintained throughout our supply chain and that our direct suppliers abide by all applicable laws and regulations. For example, we require our suppliers to comply with Ball's Supplier Guiding Principles.

The principles were developed with input from key customers, suppliers and socially responsible investment analysts, and require that our suppliers certify and demonstrate compliance with them. They cover employment practices, human rights, environment, health and safety, antitrust, bribery and corruption. Ball provides the principles to all suppliers and incorporates them as part of all new contractual relationships.

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
1
Comments
<p>There is some evidence that the company ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place, which cover conflicts of interest and gifts and hospitality. The company also states that suppliers must attempt to adhere to the principles outlined in its Business Ethics Code of Conduct.</p> <p>However, the company receives a score of '1' because it is unclear whether all suppliers are required to adhere to the company's anti-bribery and corruption terms and conditions. Moreover, these conditions do not explicitly prohibit facilitation payments, or cover whistleblowing. There is also no evidence to suggest that the company takes steps to ensure that its suppliers have adequate anti-bribery and corruption policies and procedures in place, or whether it does so when there is a significant change in the business relationship.</p>
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p2.] APPLICABILITY</p> <p>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.</p> <p>[12] Supplier Terms and Conditions – Government (Updated 2018) (Document) Accessed 04/07/2019 https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/frm0000184_form_1.pdf TERMS AND CONDITIONS – GOVERNMENT GENERAL PROVISIONS AND FAR FLOWDOWNS</p> <p>[p.6] GRATUITIES/KICKBACKS/BRIBERY/ANTI-BOYCOTT</p> <p>(a) Seller represents and warrants that neither it nor any of its employees, agents, or representatives has offered or given any kickback or gratuity to Buyer's employees, agents, or representatives with a view toward securing this Subcontract or securing favorable treatment with respect thereto.</p> <p>(b) Seller represents and warrants that: (1) it and all of its employees, agents, or representatives, and any other person or entity working for or on behalf of any of the foregoing (collectively, "Seller Parties"), are familiar with and understand the provisions and requirements of the U.S. Foreign Corrupt Practices Act of 1977 as amended and all other anti-corruption and/or anti-bribery laws, regulations, and requirements of any jurisdiction applicable to Seller Parties (collectively, "Applicable Anti-Corruption Laws"); and (2) Seller Parties, at all times and in all actions relating to this Subcontract, shall be in compliance with Applicable Anti-Corruption Laws.</p> <p>(c) By accepting this Subcontract, Seller certifies and represents that it has not made or solicited and will not make or solicit kickbacks in violation of FAR 52.203-7 or the Anti-Kickback Act of 1986 (41 U.S.C. 51-58) as amended, both of which are incorporated herein by reference, except that paragraph (c)(1) of FAR 52.203-7 shall not apply.</p> <p>[p.29] 6.) BRIBERY AND CORRUPTION</p> <p>Ball has a strict policy against bribery and corruption. Suppliers shall not make payments or provide entertainment and gifts or anything of value directly or indirectly to government officials or others so as to influence them in the performance or non-performance of their duties or induce them to use their influence or secure any improper advantage or to obtain or retain business for Ball.</p> <p>7.) DEMONSTRATION OF COMPLIANCE</p>

Suppliers will be expected to certify and demonstrate compliance with these Supplier Guiding Principles at Ball's request.

[p.18] 52.203-13 CONTRACTOR CODE OF BUSINESS ETHICS AND CONDUCT (OCT 2015)

(Applies if this Subcontract exceeds \$5,500,000 and the period of performance of this Subcontract is more than 120 days. Disclosures made under this clause shall be made directly to the Government entities identified in this clause.)

52.203-16 PREVENTING PERSONAL CONFLICTS OF INTEREST

(DEC 2011) (Applies if this Subcontract exceeds \$150,000 and if Work includes an "acquisition function closely associated with inherently governmental functions" as anticipated by this clause. Note 5 applies.)

[13] Supplier Terms and Conditions – Commercial (Updated 2014) (Document)

Accessed 04/07/2019

[https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/Terms-Conditions-Commercial-\(Ref-G-Effective-09-22-14\).pdf](https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/Terms-Conditions-Commercial-(Ref-G-Effective-09-22-14).pdf)

[p.17] PRINCIPLES

All suppliers must adhere to the following principles:

1.) LAWS AND REGULATIONS

Suppliers will comply with all applicable laws, rules, and regulations and requirements in managing their business and in providing goods and services to Ball.

[p.18] 6.) BRIBERY AND CORRUPTION

Ball has a strict policy against bribery and corruption. Suppliers shall not make payments or provide entertainment and gifts or anything of value directly or indirectly to government officials or others so as to influence them in the performance or nonperformance of their duties or induce them to use their influence or secure any improper advantage or to obtain or retain business for Ball.

7.) DEMONSTRATION OF COMPLIANCE

Suppliers will be expected to certify and demonstrate compliance with these Supplier Guiding Principles at Ball's request.

[11] 2018 Sustainability Report (Document)

Accessed 04/07/2019

https://www.ball.com/Ball/media/Ball/Ball2018_SustainabilityReport- Web.pdf

[p.31] ONBOARDING REQUIREMENTS

With our Onboarding Requirements, we communicate and align the way our suppliers consider ESG aspects, and aim to receive written confirmation that responsible business practices are maintained throughout our supply chain and that our direct suppliers abide by all applicable laws and regulations. For example, we require our suppliers to comply with Ball's Supplier Guiding Principles.

The principles were developed with input from key customers, suppliers and socially responsible investment analysts, and require that our suppliers certify and demonstrate compliance with them. They cover employment practices, human rights, environment, health and safety, antitrust, bribery and corruption. Ball provides the principles to all suppliers and incorporates them as part of all new contractual relationships.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
0
Comments
There is some evidence that the company requires its suppliers' subcontractors to observe anti-bribery and corruption legislation, but there is no evidence that it requires its suppliers to flow down the broader principles of its anti-corruption programme throughout its supply chain.
Evidence
<p>[12] Supplier Terms and Conditions – Government (Updated 2018) (Document) Accessed 04/07/2019 https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/frm0000184_form_1.pdf TERMS AND CONDITIONS – GOVERNMENT GENERAL PROVISIONS AND FAR FLOWDOWNS</p> <p>[p.6] GRATUITIES/KICKBACKS/BRIBERY/ANTI-BOYCOTT</p> <p>(a) Seller represents and warrants that neither it nor any of its employees, agents, or representatives has offered or given any kickback or gratuity to Buyer's employees, agents, or representatives with a view toward securing this Subcontract or securing favorable treatment with respect thereto.</p> <p>(b) Seller represents and warrants that: (1) it and all of its employees, agents, or representatives, and any other person or entity working for or on behalf of any of the foregoing (collectively, "Seller Parties"), are familiar with and understand the provisions and requirements of the U.S. Foreign Corrupt Practices Act of 1977 as amended and all other anti-corruption and/or anti-bribery laws, regulations, and requirements of any jurisdiction applicable to Seller Parties (collectively, "Applicable Anti-Corruption Laws"); and (2) Seller Parties, at all times and in all actions relating to this Subcontract, shall be in compliance with Applicable Anti-Corruption Laws.</p>

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption investigations relating to its suppliers, or the associated disciplinary actions.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
0
Comments
There is no evidence that the company has a policy covering the use of agents.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p2.] APPLICABILITY</p> <p>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.</p> <p>[p.18] BRIBERY AND CORRUPTION</p> <p>We do not solicit or accept bribes for ourselves or on behalf of the Company, nor give or receive kickbacks.</p> <p>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.</p>

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
0
Comments
There is some evidence that the company undertakes due diligence on its third parties. However, the information provided is insufficiently detailed to receive a score of '1'.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf [p.18] BRIBERY AND CORRUPTION</p> <p>We do not solicit or accept bribes for ourselves or on behalf of the Company, nor give or receive kickbacks.</p> <p>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</p> <p>QUESTION & ANSWER</p> <p>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.</p>

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
0
Comments
There is no evidence that the company aims to establish the beneficial ownership of its agents.
Evidence
No evidence found.

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
There is some evidence that the company's anti-bribery and corruption policy applies to agents and intermediaries acting on the company's behalf. However, the company does not include clear audit and termination rights in its contracts with these entities.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p2.] applicability<="" p=""> <p>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.</p> <p>[p.4] CONSEQUENCES FOR VIOLATING THE CODE</p> <p>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.</p> <p>[p.18] BRIBERY AND CORRUPTION</p> <p>We do not solicit or accept bribes for ourselves or on behalf of the Company, nor give or receive kickbacks.</p> <p>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.</p> </p2.]></p>

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no evidence that the company acknowledges incentive structures as a risk factor in agent behaviour.
Evidence
No evidence found.

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for and/or on behalf of the company.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?
Score
0
Comments
There is no evidence that the company conducts anti-bribery and corruption due diligence on its joint ventures.
Evidence
No evidence found.

Question
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture relationships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?
Score
0
Comments
There is evidence that the company's anti-bribery and corruption policies or procedures apply to its joint venture partners. However, there is no evidence that it requires anti-bribery and corruption clauses in its contracts with joint venture partners.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf</p> <p>[p2] APPLICABILITY</p> <p>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.</p>

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures.
Evidence
<p>[1] Business Ethics Code of Conduct (updated 2016) (Document) Accessed 13/06/2019 https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf <p2] applicability<="" p=""> <p>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.</p> </p2]></p>

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no evidence that the company addresses the corruption risks associated with offset contracting, and there is no evidence that a dedicated body, department or team is responsible for monitoring of the company's offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company has such a procedure.
Evidence
No evidence found.

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of the company's offset programme.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
There is no evidence that the company publishes any details of its offset obligations and/or contracts.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
0
Comments
There is no evidence that the company acknowledges the corruption risks of operating in different markets, or that risk assessment procedures are used to inform the company's operations in high risk markets.
Evidence
<p>[20] Responsible Sourcing Framework (Webpage) Accessed 05/07/2019 https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework</p> <p>In 2013, we introduced our Responsible Sourcing Framework, which includes a four-step approach that combines individual tools developed over the past five years.</p> <p>CATEGORY SUSTAINABILITY PROFILES</p> <p>The Category Sustainability Profiles primarily serve as a risk filter and describe potential environmental, social and governance (ESG) related risks for aluminum, steel and coatings. We generate the profiles based on our extensive experience with life cycle assessments, industry standards (such as ASI), and media and stakeholder screening. They list high-risk countries because certain ESG risks, like human rights abuses or climate change impacts, are more prevalent in certain regions of the world.</p> <p>[8] Form 10-K 2019 Accessed 03/07/2019 http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpjeU9USTNNQ1p6ZFdkemFXUTIOVG M9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMEtfMjAxOTAyMjIucGRm <p>[p.7] <u>Risk Factors</u></p> <p>[p.9] Changes in laws and governmental regulations may adversely affect our business and operations.</p> <p>We and our customers and suppliers are subject to various federal, state, provincial and local laws and regulations, which have been increasing in number and complexity. Each of our, and their, facilities is subject to federal, state, provincial and local licensing and regulation by health, environmental, workplace safety and other agencies in multiple jurisdictions. Requirements of worldwide governmental authorities with respect to manufacturing, manufacturing facility locations within the jurisdiction, product content and safety, climate change, workplace safety and health, environmental, expropriation of assets and other standards could adversely affect our ability to manufacture or sell our products, and the ability of our customers and suppliers to manufacture and sell their products. In addition, we face risks arising from compliance with and enforcement of numerous and complex federal, state, provincial and local laws and regulations.</p> </p>

Question
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?
Score
1
Comments
<p>The company publishes a full list of its fully consolidated subsidiaries and non-fully consolidated holdings, including associates, joint ventures and other related entities. For each entity, the company discloses its percentage ownership, and the country of incorporation. There is evidence that this list is current and updated on at least an annual basis. The list is accompanied by a statement that it is complete at the time of publication to the best of the company's knowledge.</p> <p>However, the company receives a score of '1' because it does not list countries of operation for each subsidiary.</p>
Evidence
<p>[8] Form 10-K 2019 Accessed 03/07/2019 http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFXOXVQVkJFUmlacGNHRm5aVDB4TWpjeU9USTNNQ1p6ZFdKemFXUTIOVG M9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMEtfMjAxOTAyMjlucGRm</p> <p>Exhibit 21. [p.1]</p>

SUBSIDIARIES OF BALL CORPORATION (Public Reporting) ⁽¹⁾

December 31, 2018

The following is a list of subsidiaries of Ball Corporation (an Indiana Corporation)

Name	State or Country of Incorporation or Organization	Percentage ⁽²⁾ Ownership Direct & Indirect
Aerosol Research Co (Great Britain) Limited	England	100%
American Can (UK) Limited	England	100%
American Can Holdings (UK) Limited	England	100%
Archer Insurance Limited	Guernsey	100%
Assetsteady Limited	England	100%
AUK Holding Ltd.	United Kingdom	100%
B O Morris (Holdings) Limited	England	100%
Ball (France) Holdings S.A.S.	France	100%
Ball (Luxembourg) Finance S.a.r.l.	Luxembourg	100%
Ball (Swiss) Holding GmbH	Switzerland	100%
Ball Advanced Aluminum Technologies Canada Inc. (f/k/a Neuman Aluminum Canada Inc.)	Quebec	100%
Ball Advanced Aluminum Technologies Canada L.P. (f/k/a Neuman Aluminum Canada L.P.)	Quebec	100%
Ball Advanced Aluminum Technologies Corp. (f/k/a Neuman USA Ltd.)	Delaware	100%
Ball Advanced Aluminum Technologies Holding Canada Inc. (f/k/a Neuman Holding Canada Inc.)	New Brunswick	100%
Ball Aerocan CZ s.r.o. (f/k/a Aerocan CZ s.r.o.)	Czech Republic	100%
Ball Aerocan Europe S.A.S. (f/k/a Aerocan S.A.S.; Name Change on 6/28/13)	France	100%
Ball Aerocan France S.A.S. (f/k/a Aerocan France S.A.S.)	France	100%
Ball Aerocan India Private Limited (f/k/a Metacan Manufacturing Private Limited; Name Change on 01/28/16)	India	100%
Ball Aerocan Mexico S.A. de C.V. (f/k/a Envases del Plata S.A. de C.V.)	Mexico	100%
Ball Aerocan Operations S.a.r.l. (f/k/a Mendoza Investments S.a.r.l.; Name Change on 09/06/13)	Luxembourg	100%
Ball Aerocan UK Limited (f/k/a Aerocan UK Ltd.; Name Change on 03/16/11)	United Kingdom	100%
Ball Aerosol and Specialty Container Holding Corporation (f/k/a U.S. Can Corporation; Name Change on 03/31/06 from Ball Aerosol and Specialty Container Corporation)	Delaware	100%
Ball Aerosol Packaging Argentina S.A.U (f/k/a Formametal S.A.)	Argentina	100%
Ball Aerospace & Technologies Corp.	Delaware	100%
Ball America Holdings Inc. (f/k/a Rexam America Holdings Inc.)	Delaware	100%
Ball America LLC (f/k/a Rexam America LLC)	Delaware	100%
Ball Americas Holdings B.V.	The Netherlands	100%
Ball Asia Pacific (Beijing) Metal Container Limited (f/k/a Beijing FTB Packaging Limited)	PRC	100%
Ball Asia Pacific (Foshan) Metal Container Limited (f/k/a Sanshui Jianlibao FTB Packing Limited)	PRC	100%
Ball Asia Pacific (Hubei) Metal Container Limited (f/k/a Hubei FTB Packaging Limited)	PRC	96%
Ball Asia Pacific (Qingdao) Metal Container Limited	PRC	100%
Ball Asia Pacific (Yangon) Metal Container Limited	Myanmar	100%
Ball Asia Pacific Investments Limited	Hong Kong	100%
Ball Asia Pacific Limited	Hong Kong	100%
Ball Asia Services Limited	Delaware	100%
Ball Beverage Can Americas Inc. (f/k/a Rexam Beverage Can Americas Inc.)	Delaware	100%
Ball Beverage Can Americas SA de CV	Mexico	100%
Ball Beverage Can Delaware Company (f/k/a Rexam Beverage Can Delaware Company)	Delaware	100%
Ball Beverage Can Egypt SAE	Egypt	100%
Ball Beverage Can Holding GmbH	Austria	100%
Ball Beverage Can Iberica SL	Spain	100%
Ball Beverage Can Mexico SA de CV	Mexico	100%
Ball Beverage Can Overseas LLC (f/k/a Rexam Beverage Can Overseas LLC)	Delaware	100%
Ball Beverage Can South America S.A. (f/k/a Rexam Beverage Can South America SA)	Brazil	100%
Ball Beverage Packaging (India) Private Limited (f/k/a Rexam Beverage Can (India) Private Limited)	India	100%

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Name	State or Country of Incorporation or Organization	Ownership Direct & Indirect
Ball Beverage Packaging AMEA Limited (f/k/a Rexam Beverage Can AMEA Limited)	England	100%
Ball Beverage Packaging Czech Republic sro (f/k/a Rexam Beverage Can Czech Republic sro)	Czech Republic	100%
Ball Beverage Packaging Europe Limited (f/k/a Rexam Beverage Can Europe Limited)	England	100%
Ball Beverage Packaging Fosite AB (f/k/a Rexam Beverage Can Fosite AB)	Sweden	100%
Ball Beverage Packaging France SAS (f/k/a Rexam Beverage Can France SAS)	France	100%
Ball Beverage Packaging Fredericia A/S (f/k/a Rexam Beverage Can Fredericia A/S)	Denmark	100%
Ball Beverage Packaging Gelsenkirchen GmbH (f/k/a Rexam Beverage Can Gelsenkirchen GmbH)	Germany	100%
Ball Beverage Packaging Holdings UK Limited (f/k/a Rexam Beverage Can Holdings UK Limited)	England	100%
Ball Beverage Packaging Iberica SL (f/k/a Rexam Beverage Can Iberica SL)	Spain	100%
Ball Beverage Packaging Ireland Limited (f/k/a Rexam Beverage Can Ireland Limited)	Ireland	100%
Ball Beverage Packaging Italia SRL (f/k/a Rexam Beverage Can Italia SRL)	Italy	100%
Ball Beverage Packaging Ludesch GmbH (f/k/a Rexam Beverage Can Enzesfeld GmbH)	Austria	100%
Ball Beverage Packaging Mäntsälä Oy (f/k/a Rexam Beverage Can Mäntsälä Oy)	Finland	100%
Ball Beverage Packaging Naro-Fominsk LLC (f/k/a Rexam Beverage Can Naro-Fominsk LLC)	Russia	100%
Ball Beverage Packaging Oss BV (f/k/a Rexam Beverage Can Oss BV)	Netherlands	100%
Ball Beverage Packaging Recklinghausen GmbH (f/k/a Rexam Beverage Can Recklinghausen GmbH)	Germany	100%
Ball Beverage Packaging Rus LLC (f/k/a Rexam Beverage Can Rus LLC)	Russia	100%
Ball Beverage Packaging UK Limited (f/k/a Rexam Beverage Can UK Limited)	England	100%
Ball Beverage Packaging Vsevolozhsk LLC (f/k/a Rexam Beverage Can Vsevolozhsk LLC)	Russia	100%
Ball Beverage Packaging Widnau GmbH (f/k/a Rexam Beverage Can Widnau GmbH)	Switzerland	100%
Ball Beverage Turkey Paketleme Sanayi ve Ticaret AŞ (f/k/a Rexam Paketleme Sanayi ve Ticaret AŞ)	Turkey	100%
Ball BP Holding Company (f/k/a Rexam BP Holding Company)	Delaware	100%
Ball Canada Plastics Container Corp.	Nova Scotia	100%
Ball Capital Corp. II	Delaware	100%
Ball Cayman International Limited	Cayman Islands	100%
Ball Chile S.A. (f/k/a Rexam Chile S.A.)	Chile	100%
Ball Company	United Kingdom	100%
Ball Container LLC	Delaware	100%
Ball Corporation	Indiana	100%
Ball Corporation	Nevada	100%
Ball Delaware Corporation (f/k/a Rexam Delaware Corporation)	Delaware	100%
Ball Delaware Holdings S.C.S. (f/k/a Ball Holdings S.a.r.l.)	Luxembourg	100%
Ball Delaware Holdings, LLC	Delaware	100%
Ball Delaware International Holdings Corp.	Delaware	100%
Ball do Brasil Ltda (f/k/a Rexam do Brasil Ltda)	Brazil	100%
Ball Embalagens Ltda.	Brazil	100%
Ball Envasas de Aluminio S.A. (f/k/a Rexam Argentina S.A.)	Argentina	100%
Ball Europe Limited	United Kingdom	100%
Ball European Holdings S.a.r.l.	Luxembourg	100%
Ball Finance LLC (f/k/a Rexam Finance LLC)	Delaware	100%
Ball Foundation – not for profit	Colorado	100%
Ball Funding Inc. (f/k/a Rexam Funding Inc.)	Delaware	100%
Ball Glass Containers, Inc.	Delaware	100%
Ball Global Business Services Corp.	Delaware	100%
Ball Global Services Americas S. de R.L. de C.V.	Mexico	100%
Ball Holdings Corp.	Delaware	100%
Ball Holdings LLC	Delaware	100%
Ball Inc. (f/k/a Rexam Inc.)	Delaware	100%
Ball Industria e Comercio de Latas e Tampas Ltda (f/k/a Rexam Industria e Comercio de Latas e Tampas Ltda)	Brazil	100%
Ball International Holdings B.V. (f/k/a recan B.V.)	Netherlands	100%
Ball International Holdings II, LLC	Delaware	100%
Ball International Holdings LLC	Delaware	100%
Ball International Holdings S.a.r.l.	Luxembourg	100%

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Name	State or Country of Incorporation or Organization	Ownership Direct & Indirect
Ball International Partners SCS	Luxembourg	100%
Ball International, LLC	Delaware	100%
Ball Luxembourg Holdings S.a.r.l.	Luxembourg	100%
Ball Luxembourg I S.a.r.l.	Luxembourg	100%
Ball Marketing Limited (f/k/a Rexam Marketing Limited)	England	100%
Ball Metal Beverage Container Corp.	Colorado	100%
Ball Metal Beverage Mexico Holdings B.V. (f/k/a Ball Saudi Arabia Holdings B.V.)	The Netherlands	100%
Ball Metal Beverage Mexico S. de R.L. de C.V. (f/k/a Ball Mexico Holdings Corp S del RL de C.V.)	Mexico	100%
Ball Metal Container Corporation	Indiana	100%
Ball Metallising Inc. (f/k/a Rexam Metallising Inc.)	Delaware	100%
Ball MI Holding Company (f/k/a Rexam MI Holding Company)	Delaware	100%
Ball Nacanco Netherlands BV	Netherlands	100%
Ball Packaging Europe Belgrade d.o.o.	Serbia	100%
Ball Packaging Europe France S.A.S. (f/k/a Ball Packaging Europe La Ciotat S.A.S. merged into Ball Packaging Europe Bieme S.A.S. on 7/31/12 thereafter name change to Ball Packaging Europe France S.A.S.)	France	100%
Ball Packaging Europe Holding B.V. (f/k/a Ball (The Netherlands) Holdings, B.V.)	The Netherlands	100%
Ball Packaging Europe Lublin Sp. z o.o.	Poland	100%
Ball Packaging Europe Metall GmbH (f/k/a Ball Packaging Europe Vorrats GmbH)	Germany	100%
Ball Packaging Europe Rostov LLC (f/k/a AzovTrubPlast LLC)	Russia	100%
Ball Packaging India Private Limited – in liquidation since 9/20/13	India	100%
Ball Packaging Products Canada Corp.	Nova Scotia	100%
Ball Packaging, LLC (f/k/a Ball Packaging Corp., f/k/a Ball Packaging Holdings Corp.)	Colorado	100%
Ball Pan-European Holdings, LLC (f/k/a Ball Pan-European Holdings, Inc.)	Delaware	100%
Ball Paraguay Sociedad Anonima	Paraguay	100%
Ball Pension Holdings GmbH	Germany	100%
Ball Peru S.A.C. (f/k/a Rexam Peru S.A.C.)	Peru	100%
Ball Southeast Asia Holdings (Singapore) PTE LTD. (f/k/a Sencroft Enterprises Pte Ltd.)	Singapore	100%
Ball Technologies Holdings Corp. (f/k/a Ball Aerospace Systems Group, Inc.)	Colorado	100%
Ball Technology Services Corporation (f/k/a Veratech, Inc.)	California	100%
Ball Trading France S.A.S. (f/k/a Ball France Operations S.A.S.)	France	100%
Ball Trading Mexico S. de R.L. de C.V.	Mexico	100%
Ball UK Acquisition Limited	United Kingdom	100%
Ball UK Holdeo Limited	United Kingdom	100%
Ball UK Holdings Ltd	United Kingdom	100%
Ball UK Investments Limited	United Kingdom	100%
BD Print Limited	England	100%
Berkeley Nominees Limited	England	100%
BMB Real Estate Holdings, LLC	Delaware	100%
Bookprint Limited	England	100%
Bowater SCG Limited	England	100%
Bowaters Canadian Holdings Limited	England	100%
B-R Secretariat Limited	England	100%
Brackenbush Limited	England	100%
Brookhill Mouldings Limited	England	100%
Causton Printing Limited	England	100%
Citiforms (Sales) Limited	England	100%
Controladora Envases Universales Rexam SA – JV	Guatemala	50%
Copal S.A.S. (majority owned by unrelated third party)	France	51%
Cope Allman Holdings Limited	England	100%
Cope Allman Int (Management Services) Limited	England	100%
Cope Allman Packaging Group Limited	England	100%
Cope Allman Packaging Limited	England	100%
Corsec Mercantile Services Limited	England	100%
Counting House Computer Systems Limited	England	100%
CPRX-Hughesville Inc.	Delaware	100%

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Name	State or Country of Incorporation or Organization	Ownership Direct & Indirect
Deister Handels & Beteiligungs GmbH	Germany	100%
Dimgate Limited	England	100%
DRG Australia Limited	England	100%
DRG France Limited	England	100%
DRG Medical Packaging Supplies (Flexpak) Ltd	England	100%
DRG Medical Packaging Supplies (Malago) Ltd	England	100%
DRG Medical Packaging Supplies Limited	England	100%
Ejectoret Limited	England	100%
Envases del Istmo SA – JV	Panama	50%
Envases Universales Ball De Panama SA – JV	Panama	50%
Envases Universales Rexam de Centroamerica SA (trading company) – JV	Guatemala	50%
Filmset Limited	England	100%
Foshan Packaging Holdings Limited (f/k/a Cassandra Limited)	Hong Kong	100%
FTB Corporate Services Limited (f/k/a Fjully Wide Industrial Ltd.)	Hong Kong	100%
FTB Packaging Limited (f/k/a Grandearn Investments Limited)	Hong Kong	100%
Gainer Developments Ltd.	BVI	100%
Hanil Can Co Limited (Associate) – JV	Korea	40%
Heekin Can, Inc.	Colorado	100%
Impact Packaging Limited	England	100%
Jambalaya S.A.	Uruguay	60.1%
Jauntbrook Limited	England	100%
Jesse Broad Limited	England	100%
John Dunhill & Co Limited	England	100%
KB Järnåldern 3	Sweden	100%
Kemsley Fields Limited – JV	England	43%
Knightsbridge Trustees Limited	England	100%
Latalog Logistica Ltda.	Brazil	100%
Latas De Aluminio Ball, Inc.	Delaware	100%
M.C. Packaging (Hong Kong) Limited	Hong Kong	100%
Magnaparva Packaging Limited – JV	England	50%
McCorquodale & Blades Trust Limited	England	100%
McCorquodale Commercial Products Limited	England	100%
McCorquodale Leasing Limited	England	100%
McCorquodale Limited	England	100%
MCP Beverage Packaging Limited	Hong Kong	100%
MCP Device Limited	BVI	100%
MCP Intellectual Property Holdings Limited	BVI	100%
Mertonlight Limited	England	100%
NO Limited	England	100%
NO Packaging Limited	England	100%
NO Pensions Administration Limited	England	100%
N&W Properties Limited	England	100%
Nacanco Deutschland GmbH	Germany	100%
National Trading Corporation	Delaware	100%
Nellford Limited	England	100%
OPD Packaging Limited	England	100%
PLM Septanus AB	Sweden	100%
Poland Glassworks Holding BV	Netherlands	100%
Prestadora de Servicios de Dentreamerica SA (employing company) - JV	Guatemala	50%
Rayeil International Limited	BVI	100%
RBT (London) Limited	England	100%
recan (Fund)	Serbia	100%
Restlat Investments Limited	England	100%
Rexam (AK) Limited	England	100%
Rexam (Jersey) Limited	Jersey	100%
Rexam AB	Sweden	100%

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Name	of Incorporation or Organization	Direct & Indirect
Rexam BC Limited	England	100%
Rexam Beauty (Taiwan Holdings) Limited	England	100%
Rexam Beverage Can (India Holdings) Limited	England	100%
Rexam Beverage Can Berlin GmbH	Germany	100%
Rexam Beverage Can Company	Delaware	100%
Rexam Beverage Can Holdings BV	Netherlands	100%
Rexam Beverage Can SAS	France	100%
Rexam Beverage Cans Limited	England	100%
Rexam Beverage Packaging Holdings Limited	England	100%
Rexam Beverage Packaging Invest BV	Netherlands	100%
Rexam Book Printing Limited	England	100%
Rexam C S Pension Trustees Limited	England	100%
Rexam CFP Limited	England	100%
Rexam Closures Limited	England	100%
Rexam Coated Products Limited	England	100%
Rexam CW Limited	England	100%
Rexam DFR China Limited	England	100%
Rexam DFR Taiwan Limited	England	100%
Rexam European Holdings AB	Sweden	100%
Rexam European Holdings Limited	England	100%
Rexam Finance Company Limited	England	100%
Rexam Finance Germany Limited	England	100%
Rexam Finance Netherlands Limited	England	100%
Rexam Finance Poland Limited	England	100%
Rexam Finance Sweden Limited	England	100%
Rexam Financial Services Limited	England	100%
Rexam Flexibles Viking Limited	England	100%
Rexam Foundation – not for profit	Delaware	100%
Rexam France SAS	France	100%
Rexam FW Limited	England	100%
Rexam Graphics Limited	England	100%
Rexam Group Holdings Limited	England	100%
Rexam Healthcare Innovation SAS	France	100%
Rexam High Performance Flexibles Limited	England	100%
Rexam Holding GmbH	Germany	100%
Rexam Holdings AB	Sweden	100%
Rexam Holdings Germany AB	Sweden	100%
Rexam Holdings Limited	England	100%
Rexam Industrial Bulk Packaging Limited	England	100%
Rexam Jersey 2007 Limited	Jersey	100%
Rexam Leasing AB	Sweden	100%
Rexam Limited (f/k/a Rexam PLC)	England	100%
Rexam Liquid Packaging Limited	England	100%
Rexam Nederland Holdings BV	Netherlands	100%
Rexam Overseas Holdings Limited	England	100%
Rexam Packaging Limited	England	100%
Rexam Packaging Systems Limited	England	100%
Rexam Pension Trustees Limited	England	100%
Rexam Pharmaceutical Packaging Limited	England	100%
Rexam Plastic Containers Limited	England	100%
Rexam Property Developments Limited	England	100%
Rexam Property Holdings Limited	England	100%
Rexam RDI Limited	England	100%
Rexam UK Holdings Limited	England	100%
Rexam United Arab Can Manufacturing Limited - JV	Saudi Arabia	51%
Rexam US Investments Limited	England	100%

[p.6]

Name	State or Country of Incorporation or Organization	Percentage ⁽²⁾ Ownership Direct & Indirect
Rexam WCL Limited	England	100%
Rexam WCP Limited	England	100%
Rexam Webster Limited	England	100%
Rexam WM Limited	England	100%
Ruth Jersey 2009 Limited	Jersey	100%
Sario Grundstücks-Vermietungsgesellschaft mbH & CO. Objekt Elfi <i>(not relevant for reporting)</i>	Germany	99%
SCI le Marais	France	100%
Sir Joseph Causton & Sons Limited	England	100%
Sofab Limited	England	100%
Solray Plastics Limited	England	100%
Specialty Coatings Group UK Trustees Limited	England	100%
The Renaissance Insurance Company	Vermont	100%
Unit Moulders Limited	England	100%
USC May Verpackungen Holding Inc.	Delaware	100%
Victor International Plastics (London) Limited	England	100%
Victor International Plastics (Manchester) Limited	England	100%
Victor International Plastics (Midlands) Limited	England	100%
Victor International Plastics (South) Limited	England	100%
Viking Packaging Limited	England	100%
Wavefront Technologies, Inc.	Maryland	100%
Wembley Press Limited	England	100%
Wessex Typesetters Limited	England	100%
Wise Champion Investments Limited	Hong Kong	100%

green=Joint Venture/Associates

red=in liquidation

blue=not for profit

(1) In accordance with Regulation S-K, Item 601(b)(21)(ii), the names of certain subsidiaries have been omitted from the foregoing lists. The unnamed subsidiaries, considered in the aggregate as a single subsidiary, would not constitute a significant subsidiary as defined in Regulation S-X, Rule 1-02(w).

(2) Represents the Registrant's direct and/or indirect ownership in each of the subsidiaries' voting capital share.

The following is a list of affiliates of BALL CORPORATION included in the financial statements under the equity or cost accounting methods:

Lam Soon-Ball Yamamura - JV	Taiwan	8%
Rocky Mountain Metal Container, LLC	Colorado	50%
TBC-Ball Beverage Can Holdings Limited	Hong Kong	50%
TBC-Ball Beverage Can Vietnam Limited	Vietnam	50%
Thai Beverage Can Ltd. - JV	Thailand	7%

The following is a list of affiliates of BALL PACKAGING EUROPE included in the financial statements under cost accounting methods:

Sekopac d.o.o. (majority owned by unrelated third party)	Serbia	11%
Slopak (majority owned by unrelated third party)	Slovenia	3.33%

*) the percentage of the participation is not known. In general, the share is not material.

[9] Form 10-K 2018

Accessed 03/07/2019

[http://services.corporate-](http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpBNU5qUTJPU1p6ZFdkemFXUTIOVG M9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMETfMjAxODAzMDEucGRm)

[ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpBNU5qUTJPU1p6ZFdkemFXUTIOVG M9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMETfMjAxODAzMDEucGRm](http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpBNU5qUTJPU1p6ZFdkemFXUTIOVG M9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMETfMjAxODAzMDEucGRm)

Exhibit 21. [p.1]

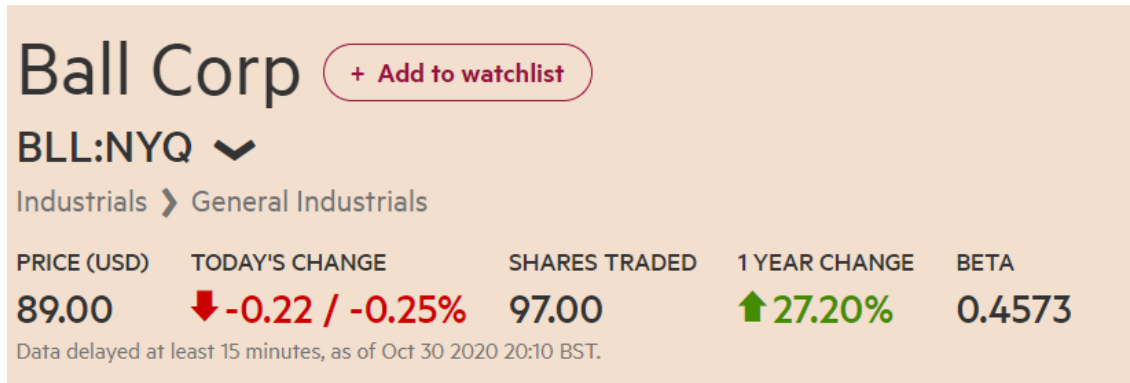
SUBSIDIARIES OF BALL CORPORATION (Public Reporting) ⁽¹⁾

December 31, 2017

The following is a list of subsidiaries of Ball Corporation (an Indiana Corporation)

Name	State or Country of Incorporation or Organization	Percentage ⁽²⁾ Ownership Direct & Indirect
654647 N.B. Inc.	New Brunswick	100%
Aerosol Research Co (Great Britain) Limited	England	100%
American Can (UK) Limited	England	100%
American Can Holdings (UK) Limited	England	100%
Archer Insurance Limited	Guernsey	100%
Assetsteady Limited	England	100%
AUK Holding Ltd.	United Kingdom	100%
B O Morris (Holdings) Limited	England	100%
Ball (France) Holdings S.A.S.	France	100%
Ball (Luxembourg) Finance S.a.r.l.	Luxembourg	100%
Ball (Swiss) Holding GmbH	Switzerland	100%
Ball Advanced Aluminum Technologies Canada Inc.	Quebec	100%
Ball Advanced Aluminum Technologies Canada L.P.	Quebec	100%
Ball Advanced Aluminum Technologies Corp.	Delaware	100%
Ball Advanced Aluminum Technologies Holding Canada Inc.	New Brunswick	100%
Ball Aerocan CZ s.r.o.	Czech Republic	100%
Ball Aerocan Europe S.A.S.	France	100%
Ball Aerocan France S.A.S.	France	100%
Ball Aerocan India Private Limited	India	100%
Ball Aerocan Mexico S.A. de C.V.	Mexico	100%
Ball Aerocan Operations S.a.r.l.	Luxembourg	100%
Ball Aerocan UK Limited	United Kingdom	100%
Ball Aerosol and Specialty Container Holding Corporation	Delaware	100%
Ball Aerosol and Specialty Container Inc.	Delaware	100%
Ball Aerosol Packaging Argentina S.A.	Argentina	100%
Ball Aerospace & Technologies Corp.	Delaware	100%
Ball Amazonia Ltda	Brazil	100%
Ball America LLC	Delaware	100%
Ball Americas Holdings B.V.	The Netherlands	100%
Ball Asia Pacific (Beijing) Metal Container Limited	PRC	100%
Ball Asia Pacific (Foshan) Metal Container Limited	PRC	100%
Ball Asia Pacific (Hubei) Metal Container Limited	PRC	96%
Ball Asia Pacific (Nanning) Metal Container Limited	PRC	100%
Ball Asia Pacific (Qingdao) Metal Container Limited	PRC	100%
Ball Asia Pacific (Shenzhen) Metal Container Limited	PRC	100%
Ball Asia Pacific (Yangon) Metal Container Limited	Myanmar	100%
Ball Asia Pacific Investments Limited	Hong Kong	100%
Ball Asia Pacific Limited	Hong Kong	100%
Ball Asia Services Limited	Delaware	100%
Ball Beverage Can Americas Inc.	Delaware	100%
Ball Beverage Can Americas, S.A. de C.V.	Mexico	100%
Ball Beverage Can Delaware Company	Delaware	100%
Ball Beverage Can Mexico, S.A. de C.V.	Mexico	100%
Ball Beverage Can Overseas LLC	Delaware	100%
Ball Beverage Can South America S.A.	Brazil	100%
Ball Beverage Packaging (India) Private Limited	India	100%
Ball Beverage Packaging AMEA Limited	England	100%
Ball Beverage Packaging Czech Republic sro	Czech Republic	100%
Ball Beverage Packaging Egypt S.A.E.	Egypt	100%

[list continues over several pages]

Question															
9.3 Does the company disclose its beneficial ownership and control structure?															
Score															
2															
Comments															
The company's parent is publicly listed on the New York Stock Exchange and it therefore automatically receives a score of '2'.															
Evidence															
<p>[25] Financial Times Markets Data (Webpage) Accessed 02/11/2020 https://markets.ft.com/data/equities/tearsheet/summary?s=BLL%3ANYQ</p>  <p>[23] Notice of 2018 Annual Meeting of Shareholders and Proxy Statement (Document) Accessed 05/07/2019 http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NjkwMjcyfENoaWxkSUQ9NDAwNzU4fFR5cGU9MQ==&t=1 [p.3]</p> <p style="text-align: center;">VOTING SECURITIES AND PRINCIPAL SHAREHOLDERS</p> <p>At the close of business on March 1, 2018, there were outstanding 350,551,810 shares of common stock. Other than 1,376 shares of common stock granted as restricted stock without voting rights, each of the shares of common stock is entitled to one vote. Shareholders do not have cumulative voting rights with respect to the election of directors.</p> <p>Based on Schedule 13G filings with the Securities and Exchange Commission ("SEC"), the following table indicates the beneficial owners of more than 5% of the Corporation's outstanding common stock as of December 31, 2017:</p> <table><tr><th>Name and Address of Beneficial Owner</th><th>Shares Beneficially Owned</th><th>Percent of Class</th></tr><tr><td>T. Rowe Price Associates, Inc. 100 East Pratt Street Baltimore, Maryland 21202</td><td>38,068,279 ⁽¹⁾</td><td>10.8</td></tr><tr><td>The Vanguard Group 100 Vanguard Boulevard Malvern, Pennsylvania 19355</td><td>36,034,813 ⁽²⁾</td><td>10.3</td></tr><tr><td>Wellington Management Group LLP Wellington Group Holdings LLP Wellington Investment Advisors Holdings LLP c/o Wellington Management Company LLP 280 Congress Street Boston, Massachusetts 02210</td><td>21,890,225 ⁽³⁾</td><td>6.3</td></tr><tr><td>BlackRock, Inc. 55 East 52nd Street New York, New York 10055</td><td>21,337,588 ⁽⁴⁾</td><td>6.1</td></tr></table>	Name and Address of Beneficial Owner	Shares Beneficially Owned	Percent of Class	T. Rowe Price Associates, Inc. 100 East Pratt Street Baltimore, Maryland 21202	38,068,279 ⁽¹⁾	10.8	The Vanguard Group 100 Vanguard Boulevard Malvern, Pennsylvania 19355	36,034,813 ⁽²⁾	10.3	Wellington Management Group LLP Wellington Group Holdings LLP Wellington Investment Advisors Holdings LLP c/o Wellington Management Company LLP 280 Congress Street Boston, Massachusetts 02210	21,890,225 ⁽³⁾	6.3	BlackRock, Inc. 55 East 52nd Street New York, New York 10055	21,337,588 ⁽⁴⁾	6.1
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Wellington Management Group LLP Wellington Group Holdings LLP Wellington Investment Advisors Holdings LLP c/o Wellington Management Company LLP 280 Congress Street Boston, Massachusetts 02210	21,890,225 ⁽³⁾	6.3													
BlackRock, Inc. 55 East 52nd Street New York, New York 10055	21,337,588 ⁽⁴⁾	6.1													

- (1) 12,331,332 shares with sole voting power.
38,068,279 shares with sole dispositive power.
No shares with shared voting power and shared dispositive power.
- (2) 489,384 shares with sole power to vote or direct to vote.
61,503 shares with shared power to vote or direct to vote.
35,491,020 shares with sole power to dispose of or to direct the disposition of.
543,793 shares with shared power to dispose of or to direct the disposition of.
- Vanguard Fiduciary Trust Company ("VFTC"), a wholly owned subsidiary of The Vanguard Group, Inc., is the beneficial owner of 388,101 shares or 0.11% of the common stock outstanding of the Corporation as a result of its serving as investment manager of collective trust accounts.
- Vanguard Investments Australia, Ltd. ("VIA"), a wholly owned subsidiary of The Vanguard Group, Inc., is the beneficial owner of 254,106 shares or 0.07% of the common stock outstanding of the Corporation as a result of its serving as investment manager of Australian investment offerings.
- (3) 16,543,135 shares with shared voting power.
21,890,225 shares with shared dispositive power.
No shares with sole voting and dispositive power.
- The securities reported by Wellington Management Group LLP, as parent holding company of certain holding companies and Wellington Investment Advisers, are owned of record by clients of Wellington Investment Advisers. Wellington Investment Advisers Holdings LLP controls directly or indirectly through Wellington Management Global Holdings, Ltd., Wellington Investment Advisers. Wellington Investment Advisers Holdings LLP is owned by Wellington Group Holdings LLP. Wellington Group Holdings LLP is owned by Wellington Management Group LLP.
- (4) 18,486,362 shares with sole voting power.
21,337,588 shares with sole dispositive power.
No shares with shared voting power.
No shares with shared dispositive power.

[p.4] BENEFICIAL OWNERSHIP

The following table lists the beneficial ownership of common stock of the Corporation of our director nominees, continuing directors, all individuals who served as either our Chief Executive Officer ("CEO") or our Chief Financial Officer ("CFO") during the last fiscal year, the three other most highly compensated executive officers of the Corporation and, as a group, all of such persons and our other executive officers as of the close of business on March 1, 2018.

Title of Class	Name of Beneficial Owner	Shares Beneficially Owned ⁽¹⁾	Percent of Class ⁽²⁾	Included in Shares Beneficially Owned	Excluded from Shares	
				Number of Shares Which Become Available or Subject to Options Exercisable or Which Become Exercisable Within 60 Days of March 1, 2018 ⁽³⁾	Deferred Share or Stock Unit Equivalent ⁽⁴⁾	Restricted Stock Shares or Units ⁽⁵⁾
Common	Robert W. Alspaugh	6,000	*	—	59,922	75,214
Common	Charles E. Baker	515,928 ⁽⁶⁾	*	314,512	137,466	62,229
Common	Michael J. Cave	6,000	*	—	6,120	22,854
Common	Hanno C. Fiedler	326,050	*	72,590	—	72,590
Common	Daniel W. Fisher	74,064	*	38,302	6,601	73,080
Common	John A. Hayes	3,193,226 ⁽⁷⁾	*	2,690,516	546,209	279,929
Common	Daniel J. Heinrich	9,500	*	—	3,357	15,858
Common	R. David Hoover	2,658,770	*	1,860,542	181,386	38,542
Common	Pedro H. Mariani	6,000	*	—	—	50,542
Common	Scott C. Morrison	927,905	*	577,714	288,284	98,810
Common	Georgia R. Nelson	18,000	*	—	69,501	71,214
Common	Cynthia A. Niekamp	6,000	*	—	—	15,858
Common	Lisa A. Pauley	697,605 ⁽⁸⁾	*	293,240	172,622	65,720
Common	Cathy D. Ross	—	*	—	—	3,495
Common	George M. Smart	189,766	*	114,882	26,848	71,214
Common	Theodore M. Solso	121,882 ⁽⁹⁾	*	—	130,227	71,214
Common	Stuart A. Taylor II	167,356	*	—	107,293	71,214
Common	All of the above and present executive officers as a group ⁽²¹⁾	9,350,028 ⁽¹⁰⁾	2.7	6,219,574	1,860,555	1,304,061

Question
9.4 Does the company publish a percentage breakdown of its defence sales by customer?
Score
0
Comments
The company does not publish the customers of its defence sales.
Evidence
No evidence found.

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No.	Type (Webpage or Document)	Name	Download Date	Link
01	Document	Business Ethics Code of Conduct	13/06/19	https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-Business-Ethics-Code-of-Conduct.pdf?ext=.pdf
02	Webpage	Business Ethics Code of Conduct	13/06/19	https://www.ball.com/codeofconduct
03	Webpage	Executive Officers and Board of Directors Business Ethics Statement	13/06/19	http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govConduct
04	Webpage	Corporate Governance Guidelines	13/06/19	http://phx.corporate-ir.net/phoenix.zhtml?c=115234&p=irol-govguidelines
05	Document	Audit Committee Charter 2018	13/06/19	http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9MjIzODI3fENoaWxkSUQ9LTF8VHlwZT0z&t=1
06	Webpage	Ethics and Compliance Governance	03/07/19	https://www.ball.com/na/vision/sustainability/our-approach/sustainability-governance
07	Document	Nominating/ Corporate Governance Committee Charter	03/07/19	http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NTY3NjV8Q2hpbGRJRD0tMXxUeXBIPtM=&t=1
08	Document	Form 10-K 2019	03/07/19	http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpjU9USTNNQ1p6ZFdkemFXUTIOVGM9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMEtfMjAxOTAyMjIucGRm
09	Document	Form 10-K 2018	03/07/19	http://services.corporate-ir.net/SEC/Document.Service?id=P3Vybd1hSFlwY0RvdkwyRndhUzUwWlc1cmQybDZZWEprTG1OdmJTOWtiM2R1Ykc5aFpDNXdhSEEvWVdOMGFxOXVQVkJFUmlacGNHRm5aVDB4TWpBNU5qUTJPU1p6ZFdkemFXUTIOVGM9JnR5cGU9MiZmbj1CQUxMQ09SUF8xMEtfMjAxODAzMDEucGRm
10	Document	Political Contributions Policy	03/07/19	http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NDE0NzI5fENoaWxkSUQ9LTF8VHlwZT0z&t=1&cb=636807526571009965
11	Document	2018 Sustainability Report	04/07/19	https://www.ball.com/Ball/media/Ball/Ball2018_SustainabilityReport-Web.pdf
12	Document	Supplier Terms and Conditions –	04/07/19	https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/frm0000184_form_1.pdf

		Government (Updated 2018)		
13	Document	Supplier Terms and Conditions – Commercial (Updated 2014)	04/07/19	https://www.ball.com/aerospace/Aerospace/media/Aerospace/Downloads/Terms-Conditions-Commercial-(Ref-G-Effective-09-22-14).pdf
14	Webpage	Political Action Committee	05/07/19	https://goballpac.com/
15	Webpage	BallPAC in Action	05/07/19	https://goballpac.com/author/ballpacadmin/
16	Webpage	BallPAC Who Do We Contribute To?	05/07/19	https://goballpac.com/contributions/
17	Webpage	2016 Contribution Recipients	05/07/19	https://goballpac.com/2016-contribution-recipients/
18	Webpage	Ball Foundation - Funding Guidelines	05/07/19	https://www.ball.com/na/vision/sustainability/community/ball-foundation/funding-guidelines
19	Webpage	The Ball Foundation	05/07/19	https://www.ball.com/na/vision/sustainability/community/ball-foundation
20	Webpage	Responsible Sourcing Framework	05/07/19	https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework
21	Document	Supplier Guiding Principles	05/07/19	https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball_Supplier_Guiding_Principles.pdf
22	Document	Disciplinary Policy	05/07/2019	https://www.ball.com/getattachment/Executives-(1)/executive-onboarding/policies/Disciplinary-Policy-May19.pdf.aspx?lang=en-US
23	Document	Notice of 2018 Annual Meeting of Shareholders and Proxy Statement	05/07/19	http://phx.corporate-ir.net/External.File?item=UGFyZW50SUQ9NjkwMjc5fENoaWxkSUQ9NDAwNzU4fFR5cGU9MQ==&t=1
24	Webpage	OpenOwnership.org Search	05/07/19	https://register.openownership.org/entities/59b9a25b67e4ebf34029e9bb
25	Webpage	Financial Times Markets Data	02/11/20	https://markets.ft.com/data/equities/tearsheet/summary?s=BLL%3ANYQ