

## **CROWN'S WHISTLEBLOWING AND BUSINESS ETHICS HOTLINE POLICY**

### **I. PURPOSE**

Crown Holdings, Inc. and its subsidiary companies (collectively "Crown") are committed to maintaining its values and operating in accordance with the highest ethical standards. To fulfill this commitment, Crown depends upon every director, officer, and employee to conduct business with integrity; to respect and obey all applicable laws, rules, and regulations; and to strive to adhere to the highest standards of honesty, morality, and decency in the performance of his or her job responsibilities.

In furtherance of this commitment and Crown's commitment to fostering an environment where concerns can be raised and issues addressed without fear of retaliation, Crown is implementing this stand-alone Whistleblowing Policy together with Crown's new Business Ethics Line ("CBE Line"). The CBE Line serves as a confidential channel, administered by a third party, for employees, directors, officers, consultants, customers, vendors and business associates to report in good faith potential violations of Crown's Code of Business Conduct and Ethics or any other applicable Crown policy or legal requirement.

### **II. WHISTLEBLOWING POLICY**

Every employee bears the responsibility to protect Crown's reputation and integrity. If you know or believe that, in the conduct of business for or on behalf of Crown, someone has violated applicable law, Crown's Code of Business Conduct and Ethics or any other applicable policy or legal requirement, it is important that you report the violation. Crown employees may report any such violations to (i) their supervisors, (ii) their plant managers or equivalent, (iii) the relevant regional Compliance Officer or (iv) the CBE Line which is administered by an independent third-party provider, Mitrastech Syntrio f/k/a Lighthouse Services. Complaints about workplace issues or disputes such as grievances regarding performance evaluations, hours of work, wages, raises, disagreements with peers or supervisor, etc., are often best addressed to the relevant Human Resources personnel.

While each employee should report possible violations in the manner with which s/he is most comfortable, employees are strongly encouraged to report any concerns to their supervisors first. If any employee feels hesitant in any way about reporting such a violation to his or her supervisor (for example, if the supervisor is personally involved in the violation), s/he may report the violation to the plant manager, the relevant regional Compliance Officer, the CBE Line or, in the case of interpersonal or employment issues, to the relevant Human Resources personnel. Subject to applicable law, reports will remain anonymous upon request. Because it is sometimes more difficult for the Company to investigate reports that are made anonymously, individuals are encouraged to report their concerns directly to their supervisors or plant managers or to share their identities when contacting the CBE Line, assuming they feel it is safe to do so. External business associates, such as Crown suppliers, sub-contractors or customers, may also report violations to the CBE Line.

Anyone who makes a report in good faith is protected by the section of this Policy below on anti-retaliation.

### **III. SCOPE**

This Policy is intended to encourage Crown employees, directors, officers, consultants, customers, vendors, sub-contractors and business associates to report, pursuant to the procedures set forth below, when they believe in good faith that unethical or illegal behavior, such as a violation of Crown's Code of Business Conduct and Ethics ("Code"), Crown's Supplier Code of Conduct, Crown's Human Rights Policy or Crown's Anti-Corruption Policy (collectively "Crown's Compliance Codes"), the law, or any other applicable legal requirement or policy, has occurred.<sup>1</sup> For purposes of this Policy, unethical or illegal behavior includes, without limitation:

- Bribes, kickbacks or facilitation payments
- Improper financial reporting, fraud, money laundering, or embezzlement
- Anti-competitive practices such as agreements with competitors regarding pricing strategies or bids
- Illegal insider trading
- Falsification of company records
- Concerns about accounting/auditing practices or the accuracy of financial statements or auditing matters
- Excessive gift(s) from a vendor, partner, or customer
- Harassment of or discrimination against an employee
- Theft of Crown assets for personal benefit
- Purchase of personal items with company funds
- Serious health and safety violations, including environmental concerns

A report is made "in good faith" when an individual has a sincere belief that the facts reported are true at the time of reporting and that a policy violation or unlawful conduct may have occurred. Reports that are made maliciously, or in bad faith, are themselves violations of Crown's Compliance Codes and may result in disciplinary action, up to and including termination of employment or business relationships.

### **IV. PROCEDURE**

Generally, Crown employees should first report any concern they may have regarding possible violations of Crown's Compliance Codes, the law, or other applicable policy or legal requirement to their supervisors. The supervisor is usually in the best position to answer any questions and offer guidance. If you feel hesitant in any way about reporting a possible violation to your supervisor, you may report your concern to the HR manager (for interpersonal or employment issues), plant manager or the relevant regional Compliance Officer. If you do not feel comfortable raising your concerns through Crown's traditional reporting channels, you may contact Crown's CBE Line.

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<sup>1</sup> In the event the potential concern relates to Crown's Transit Packaging Division (Signode), please contact Signode's Confidential Hotline at [www.sighelpine.ethicspoint.com](http://www.sighelpine.ethicspoint.com).

The CBE Line is supported by a third-party vendor, Mitrtech Syntrio f/k/a Lighthouse Services, and staffed by trained professionals 24 hours a day, 7 days a week. To access the CBE Line, follow the instructions below:

- Website: <https://report.syntrio.com/crowncork>
- English speaking USA and Canada: (877) 222-3029 (not available from Mexico)
- Spanish speaking USA and Canada: (800) 216-1288 (not available from Mexico)
- French speaking Canada: (855) 725-0002
- Mexico: 800-681-5340
- Outside of North America:
  1. Make sure you have an outside line.
  2. Enter the [Access Code](#) for the country and/or the telephone system you are calling from. (See table below. Note Access Codes are subject to change - see [AT&T Access Codes \(att.com\)](#)).
  3. When prompted, enter the toll-free number (800) 603-2869. There is no need to dial “1” before the toll-free number.
  4. You are now connected to the CBE Line. A Mitrtech Syntrio f/k/a Lighthouse Services greeting will be played in multiple languages. Make a choice from the prompts or press 0 and tell the English operator the language you speak. An interpreter will then join the call.

<b>ETHICS HOTLINE ACCESS CODES</b>			
Barbados .....	1-800-225-5288	Italy .....	800-172-444
Belgium .....	0-800-100-10	Jamaica .....	1-800-872-2881
Brazil .....	0-800-890-0288	Jordan .....	1-880-0000
	0-800-888-8288	Malaysia .....	1-800-80-0011
Cambodia .....	1-800-881-001	Poland .....	0-0-800-111-1111
China .....	10-811	Saudi Arabia .....	1-800-10
	<i>South, Shanghai - CT</i>	Singapore .....	<i>SingTel</i> 800-011-1111
	108-888		<i>StarHub</i> 800-001-0001
	<i>North, Beijing CNG</i>	Slovakia .....	0-800-000-101
Colombia .....	01-800-911-0010	Spain .....	900-99-0011
	<i>{Spanish}</i> 01-800-911-0011	Switzerland .....	0-800-890011
France .....	<i>Orange</i> 0-800-99-0011	Thailand .....	1-800-0001-33
	<i>Telecom Development</i> 0-805-701-288	Turkey .....	0-811-288-0001
Greece .....	00-800-1311	United Arab Emirates .....	8000-021
Hong Kong .....	800-96-1111		<i>du</i> 8000-555-66
	<i>Hong Kong Telephone</i>		<i>Military-USO &amp; cellular</i> 8000-061
	800-93-2266	United Kingdom .....	0-800-89-0011
	<i>New World Telephone</i>	Vietnam .....	<i>VNPT</i> 1-201-0288
Hungary .....	06-800-011-11		<i>Viettel</i> 1-228-0288
Indonesia .....	001-801-10		

- E-mail: [standard-reports@mitratech.com](mailto:standard-reports@mitratech.com) (NOTE: you must include Crown’s name with your report)
- Mail: Mitrtech Syntrio f/k/a Lighthouse Services, 630 Freedom Business Center Drive, 3rd Floor, King of Prussia, PA 19406 USA (NOTE: you must include Crown’s name with your report)

Concerns expressed anonymously will be investigated, with consideration given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

Reporters are encouraged to provide as much specific information as possible, including names, dates, places and events that took place; the general nature of the concern; and how the reporter became aware of the issue. Reporters are also encouraged to provide all supporting documents or references that they believe will enable Crown to make a proper assessment of the complaint.

## **V. INVESTIGATIONS**

### **A. Initial Receipt of Report**

All reports to the CBE Line will be acknowledged as promptly as possible (usually within 7 days depending on the jurisdiction). An acknowledgement of receipt of the report does not constitute notification that the allegations in the report are within the scope of this Policy or will be formally investigated. Additional information may be requested in the acknowledgement of receipt if the information provided by the reporter is incomplete or insufficient for Crown to properly assess the validity or scope of the concern. If Crown cannot provide an acknowledgement of receipt due to the lack of accurate contact information in the report, the reporter may obtain follow-up information regarding his or her concern by contacting the CBE Line.

Crown's Legal Department will receive a copy of each report lodged with the CBE Line. The Legal Department will assign the report to the appropriate departments (e.g., Human Resources, Finance, Internal Audit, Legal) to determine whether the reported concern is within the scope of this Policy and whether a formal investigation is needed. The action taken will depend on the nature of the concern (whether the type of complaint is covered by this Policy) as well as the level of information provided. Reports will only be shared with employees and third parties involved in the investigation. Anyone involved in the investigation who receives the report will be subject to confidentiality obligations. Note that some concerns may be resolved by agreed upon action without the need for a formal investigation.

A determination as to whether a reported concern falls within the scope of this Policy and whether an investigation is necessary will be made as promptly as possible and in accordance with all applicable laws and regulations. In the event it is determined that the reported concern does not fall within the scope of this Policy, the reporter will be notified and any personal data collected by the CBE Line from the reporter will be destroyed or anonymized where required by applicable law.

### **B. Investigation of Reports Within Scope of Policy**

If it is determined that a reported concern is within the scope of this Policy and an investigation is necessary, the assigned departments (e.g., Human Resources, Finance, Internal Audit, Legal) will initiate the investigation. The manner of the investigation will vary depending on the nature of the reported concern. If a report does not include all relevant facts, and additional facts cannot be obtained by the investigators after reasonable efforts, there may be insufficient information to fully investigate the concern. Any person who has access to information during the course of an investigation, including third parties investigating on behalf of Crown, is bound by a strict

obligation of confidentiality. Any investigation will be conducted in a neutral and objective manner and will comply with all applicable local laws and regulations. The time required to complete an investigation will vary depending upon the type of conduct alleged and the availability of information related to it. To the extent the investigators deem appropriate, and in accordance with all applicable local laws and regulations, the reporter will be advised of the progress of the investigation and will receive feedback.

Upon completion of the investigation, and as permitted by applicable law, corrective actions may be taken by Crown and/or disciplinary action may be taken against the subject of the report. The specific actions taken by Crown will vary with the matter at hand and the results of any investigation. Crown will endeavor to notify the reporter that the investigation has been completed and that appropriate measures, if any, have been taken. All employees are expected to fully cooperate with any investigation performed by or on behalf of Crown.

## **VI. ANTI-RETALIATION**

Crown will not tolerate retaliation or any retribution against anyone who, in good faith, reports a violation of Crown's Compliance Codes, or who participates in the investigation of such a report, even if sufficient evidence is not found to substantiate the concern. Anyone who reports, proposes to report or seeks advice concerning a possible violation will be treated with dignity and respect. Employees will not be subjected to any form of discipline or retaliation for reports made in good faith. Any Crown personnel found to have retaliated against or in any way punished a Crown employee for having in good faith reported a violation will be subject to discipline, up to and including termination. Abuse of the CBE Line or reports made maliciously or in bad faith are a violation of Crown's Compliance Codes and may result in disciplinary action, including termination of employment or business relationships.

Additional protection measures may be provided in local jurisdictions depending on applicable laws.

## **VII. CONFIDENTIALITY**

Unless an individual is located in a country that restricts anonymous reporting, the CBE Line permits individuals to report concerns anonymously, at their discretion. Independent trained personnel, who are not Crown employees, administer the hotline. When a reporter requests anonymity, every effort will be made by the administrators of the CBE Line to protect the reporter's identity. Please note that any information provided in a whistleblower report may be the basis of an internal and/or external investigation by Crown into the matter being reported.

If a reporter provides his or her identity, or the reporter's identity becomes known to Crown, the Company will take all reasonable measures to keep the reporter's identity confidential. Information relating to a reported concern is only communicated to the extent necessary. Any authorized individuals who have access to such information, including third parties involved in any investigation, will keep the identity of the reporter and any information related to the reported concern confidential. Any personal data collected as part of any investigation will only be retained until the conclusion of the proceedings, where required by applicable law.