

Responsible and Ethical Sourcing Policy

Crown Holdings, Inc., through its worldwide family of companies, is committed to acting ethically and responsibly in all facets of our operations.

Sustainability is a basic value at Crown. One key objective of Crown's Supplier Code of Conduct ("Supplier Code") is to advise our suppliers of, and align our suppliers with, our sustainability values. We encourage our suppliers to continuously work to implement sustainable development principles, like the ones in our Supplier Code, in their own operations and in their supply chain. Entering into a contractual relationship with Crown shall evidence suppliers' agreement to the principles described in this Responsible and Ethical Sourcing Policy.

At Crown, environmental commitment is a fundamental part of our business philosophy. Crown recognizes that the protection of human health and the environment is a sound business practice that conserves resources and safeguards employees, customers, the general public and the environment.

Responsible enterprises consider the potential environmental impacts of daily business decision-making processes, opportunities for conservation of natural resources, source reduction, material recycling, and pollution control to improve air and water quality and reduce landfill wastes. Crown requires its suppliers to conduct business in accordance with all applicable environmental laws and highly recommends that its suppliers adopt sustainable practices in the conduct of their operations so as to conserve natural resources and minimize their environmental impact.

Crown requires that its suppliers support and respect the protection of human rights. Our Supplier Code is designed to ensure that Crown suppliers are not complicit in human rights abuses and requires compliance with all principles under Crown's Human Rights Policy [www.crowncork.com/investors/policies/human-rights-policy]. Crown expects its suppliers to follow universally-accepted employment practices and to prioritize health and safety. Suppliers shall comply with all applicable labor laws, including those related to wages, overtime, vacations, absences, disability, maximum working hours and legal right to work. Suppliers shall also not employ anyone under the legal working age or permit the use of forced or compulsory labor, slavery or human trafficking in their own facilities or in their supply chain.

Responsible and Ethical Sourcing Goals

The objective of Crown's Responsible and Ethical Sourcing program is to identify and eliminate where possible any negative environmental and social practices misaligned with Crown's mission and vision.

Crown's Responsible and Ethical Sourcing Program primarily focuses on the providers of the raw materials, components, and finished goods that are essential to our business. Crown's

current sustainability program, available at www.crowncork.com/sustainability, includes targets for assessing Core Suppliers to ensure compliance with this Responsible and Ethical Sourcing Policy. Crown defines a Core Supplier as one that sells raw materials, components, or finished goods that Crown determines are fundamental and critical to our ability to produce and sell our products globally. Raw materials suppliers will be defined as core if they meet a series of targets of regional importance.

Crown's Responsible and Ethical Sourcing Program Implementation Levers

Striving for excellence and continuous improvement is an important facet of how Crown conducts business. Crown expects Core Suppliers to:

- Continuously improve their products and/or services to improve quality, reduce cost and reduce the impact of their products on the environment.
- Maintain accurate supply chain records.
- Identify, set targets and implement action plans for reducing environmental impacts in the areas of water and energy use, wastewater discharge, greenhouse gas emissions, generation of waste, landfill use and packaging.
- Strive to track and reduce their environmental footprint, commit to continuous improvement on sustainability issues, and support the achievement of the goals of Crown's sustainability program.
- Source raw materials from sustainable sources in line with applicable laws.

Crown requires that Core Suppliers ensure that the principles of this Responsible and Ethical Sourcing Policy are upheld throughout their supply chain. Crown reserves the right to validate Core Suppliers' compliance with such principles through certifications of compliance or audits conducted by Crown personnel or third-party assurance providers which may include reviews of the Core Supplier's supporting documentation and records, questionnaires, on-site visits, or any other appropriate evaluative method. If Crown determines that a Core Supplier is not in compliance with this Responsible and Ethical Sourcing Policy, Crown may review the non-compliance with the Core Supplier and require the Core Supplier to implement corrective measures to achieve compliance.

Crown's Responsible and Ethical Sourcing Program continuous improvement process includes engaging with suppliers (that is, Core Suppliers and other suppliers) and deploying the following implementation levers over time:

- 1- Crown will extend its ongoing responsible sourcing program globally, prioritizing the Company's most frequent and/or largest purchase categories. These categories make up the biggest portions of our overall spend. Small changes to such purchases could significantly affect both the impacts caused, as well as the Company's progress.
- 2- Crown will use the opportunity created by new contract negotiations or review/renew/reappraisal processes to incorporate social and environmental criteria into sourcing decisions.

- 3- For Core Suppliers, Crown also may deploy third-party assessments and audits to verify compliance with its Supplier Code, notably in case of:
 - a. lack of regulation and law enforcement in the region where Core Suppliers manufacturing facilities are located;
 - b. intrinsic industry-specific challenges and reputational risks as identified by stakeholders, academia, industry and civil society organizations;
 - c. lack of supply chain transparency and/or traceability; or
 - d. risk of continuity of supply of critical product inputs.
- 4- As proof of compliance with Crown's Responsible and Ethical Sourcing Program requirements, Crown will accept third-party verifications offered by suppliers and/or their sub-suppliers when those third parties are deemed by Crown and stakeholders as a credible source of verification. Currently, that list would include Ecovadis, SEDEX and ASI, among others.
- 5- Crown encourages our supplier partners, where applicable, to join and maintain membership in the Aluminium Stewardship Initiative (ASI), ResponsibleSteel, or similar ethical trade organizations.
- 6- Crown ensures that its procurement teams globally are being trained on the Company's Responsible and Ethical Sourcing Policy and Supplier Code.

Review and Monitoring

Crown maintains oversight of this Responsible & Ethical Sourcing Policy through collaboration among senior management from the following functional areas within the Company: Global Procurement; Sustainability; Human Resources; Environment, Health and Safety; Legal and Risk Management. These functions work together to support the integration of environmental, social and governance considerations into procurement-related activities and to promote alignment with Crown's global sourcing policies and its current sustainability program, available at www.crowncork.com/sustainability.

This Responsible and Ethical Sourcing Policy is reviewed periodically and may be updated to reflect developments in applicable legislation, recognized sustainability standards, emerging supply-chain considerations and relevant industry practices.

This Responsible and Ethical Sourcing Policy is available in all prevailing languages where Crown facilities are located.