

SIGNODE HUMAN RIGHTS POLICY

Signode Industrial Group, a collection of legal entities including their business units that are parent companies, subsidiaries, so-called brother/sister concerns, affiliates or joint ventures of each other and operate collectively in the global industrial packaging business segment under the common umbrella “Signode Industrial Group” or the “Transit Packaging Division” of Crown Holdings, Inc. (collectively, “SIGNODE”), aims to maintain the highest standards of ethics and employee rights. This means that we respect and, where necessary, protect the fundamental human rights of all our employees, wherever they may be.

The purpose of this policy is to guide SIGNODE management and support employees and temporaries to achieve these goals.

The principles set forth herein are informed by the [UN Universal Declaration of Human Rights](#), the Four Fundamental Principles and Rights at Work from [International Labour Organization](#) (ILO), [the United Nations Global Compact Guiding Principles](#) and the national legislation in each country in which we operate.

Our responsibilities include but are not limited to our operating sites and offices in the countries where we operate. In the vast majority of countries, employee rights are adequately covered by local legislation. In these countries, we do not simply adhere to minimum requirements but strive to set better standards. In countries where the legislation does not address the basic principles that inform SIGNODE’s conduct, we aim to offer the same level of protection as is afforded elsewhere in our operations, while recognizing that policies may need to take account of local culture, conditions and regulations.

SIGNODE promotes the approach described above with its subcontractors and suppliers through its [Supplier Code of Conduct](#), which compels them to commit to following a set of principles that reinforces the ones set forth in this Policy.

SIGNODE recognizes that its presence has an impact on the communities in which it operates. We are committed to creating economic opportunity and fostering goodwill in the communities in which we operate through locally relevant initiatives. We are part of the supply-chain in the food and beverage industries, which provides continuous access to canned food under critical circumstances to populations around the world. In addition to manufacturing containers that provide the maximum protection to nutritious food and beverages, we also manufacture closures for baby food, aerosol containers for cleaning and sanitizing products, and numerous other products that provide for the safe and secure transportation of goods in transit. We are proud to be a vital part of the support system to our customers and consumers alike.

Safe working conditions are paramount

Our long-term vision with respect to health, safety and environment is: no accidents, no harm to people and no damage to the environment.

The safety and the health of our employees, temporaries, subcontractors and suppliers are paramount. Our overarching goal is to protect them against risk of harm and to ensure their mental and physical well-being at our operating sites and in our offices.

We are committed to using sustainable environmental, health and safety practices and complying with all applicable laws, regulations and company standards in the countries where we operate.

We constantly work to ensure that our employees understand the critical role that they play in their own safety and that of their fellow employees. We are committed to engaging with them continuously to improve health and safety at our operating sites and offices.

Where living accommodation and/or eating facilities are provided we insist that the premises are kept safe and hygienic and meet the basic human needs of our employees, including their needs for shared leisure areas and facilities.

Employment is freely chosen

We would never directly or indirectly force employees to work for us against their will, nor would we buy from or sell to any organization known to condone forced labor.

[SIGNODE's Modern Slavery Statement](#) has been published on SIGNODE's website at www.signode.com under "Governance." This statement comports with national, state and local laws on the subject, including the UK Modern Slavery Act 2015. This statement sets out the steps taken by SIGNODE to ensure that modern slavery does not occur in our operations and supply chains.

Child Labor shall not be used

We would never recruit child labor (as per ILO Labour standards), nor would we buy from or sell to any organization known to condone such practices. Young persons under 18 shall neither be employed at night, nor in hazardous conditions.

Through our Supplier Code of Conduct, SIGNODE works in collaboration with subcontractors and suppliers to prevent and prohibit any hiring (instances) of child labor.

Freedom of association and the right to collective bargaining are respected

We respect the rights of our employees to join or form trade unions and to bargain collectively. We equally respect the rights of our employees not to join trade unions and will protect them against intimidation, harassment and discrimination in the same way.

Where the rights of employee representatives are set out in national law we respect these and commit to maintaining a constructive dialogue with them. SIGNODE is committed to bargaining in good faith with such chosen representatives and within the appropriate national legal frameworks.

Regular employment is provided

All our employees, be they full-time, part-time or temporary, work pursuant to a regular pattern or patterns defined in their working contracts or collective agreements where applicable.

Working hours are not excessive

Basic and over-time working hours comply with applicable laws, regulations, collective bargaining agreements, and are based on international labor standards.

In all cases, appropriate overtime rates are paid. We comply with applicable laws and regulations intended to protect employees against exploitation in terms of working hours.

Our wages address market demands

We recognize that, in most locations, the market dictates wage levels above the legal minimum. However, we are committed to ensuring that in all cases the wage paid meets or exceeds minimum legal requirements, through collective bargaining agreements where applicable.

We ensure that employees understand their wages and benefits both before being employed and during employment. We do not permit deductions from wages (for hours worked) for disciplinary reasons.

No discrimination is permitted

SIGNODE treats all employees and temporaries with fairness, respect and dignity. SIGNODE is determined to maintain a work environment which is free from all forms of unlawful employment discrimination based on race, color, sex, gender, national or social origin, ancestry, nationality, citizenship, religion, age, gender identity or expression, sexual orientation, physical or mental disability, political opinion or any other characteristic as defined by the applicable law.

We do not tolerate any form of abuse or harassment, be it physical, sexual or verbal. This includes actions that can reasonably be considered as offensive, intimidating or discriminatory.

We expect those we work with to behave and act according to our corporate culture, with our sense of fairness and equal opportunity.

It is also SIGNODE's policy not to discriminate against any applicants for employment on any of the bases described above.

Equal opportunity is offered

We value and encourage the contribution of our employees, whether individual or collective. We believe a diverse workforce and an inclusive working environment benefits our business, our organization and our people.

Therefore SIGNODE is committed to offering equality of opportunity when hiring, developing, compensating or considering individuals for promotion, termination or retirement, without discrimination. SIGNODE's decisions rely on qualifications, skills, performance and experience.

Use of conflict minerals is avoided

In its efforts to promote Human Rights where it can and to operate in compliance with applicable laws, SIGNODE has issued a [Conflict Minerals Policy](#). In accordance with this policy, the Company aims to avoid the use of conflict minerals in the manufacture of its products and is committed to complying with its reporting obligations.

Rights and responsibilities

SIGNODE will make sure that all employees and temporaries are informed, understand and put this policy into practice in the scope of their employment. We will make sure it is well-publicized together with our other Company policies, notably the [Supplier Code of Conduct](#) as well as facility-level policies and procedures to follow in case of employee grievances.

All of the above implies rights and responsibilities for employees. If an employee becomes aware of human rights abuses within our operations or supply chain, he/she has four ways to report it : (1) to his or her supervisor; (2) to the plant manager or the equivalent; (3) to the Business HR Director or the Company's General Counsel, without fear of reprisal or of breach of confidentiality (if feasible and legally permissible); or (4) via SIGNODE's ethics and compliance website/portal (www.SIGhelpline.ethicspoint.com) or by telephone 1-855-866-2925 (in the US/Canada) or visit www.signode.com/Suppliers for a list of international telephone number options.

Review and monitoring

SIGNODE will periodically review the Policy and amend to respond to changes in legislation and best practices in an effort to improve its effectiveness.