



Conflict Minerals Policy

Policy Statement

Crown Holdings, Inc., together with its consolidated subsidiaries (collectively, the “Company”), recognizes that it has an opportunity to promote human rights where it can make a positive contribution and an obligation to operate in compliance with all applicable laws wherever it does business. That obligation includes compliance with U.S. laws¹, which aim to prevent the use of certain minerals if they are sourced in a way that directly or indirectly finances or benefits armed groups in certain “Covered Countries².” The minerals impacted include columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted), cassiterite (the metal ore from which tin is extracted), gold, wolframite (the metal ore from which tungsten is extracted), and their derivatives (collectively, “3TG”). 3TG minerals that are sourced in a way that directly or indirectly finances or benefits armed groups in Covered Countries are referred to as “conflict minerals.”

Procedure

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 under applicable law. Accordingly, the Company has implemented due diligence measures for tracing and sourcing 3TG in its products designed in conformance with the due diligence related steps of the framework in The Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Third Edition, and the related supplements for 3TG, consistent with the Company’s position as a downstream company. The Company also relies on information from the Responsible Minerals Assurance Process (“RMAP”), a voluntary initiative managed by the Responsible Minerals Initiative (the “RMI”), in which an independent third party audits the procurement activities of a smelter or refiner to determine, with reasonable confidence, that the minerals it processes originated from conflict-free sources.

To identify risks in its supply chain, the Company first assesses the likelihood of the presence of conflict minerals in each of its products. The Company has determined that most of its steel containers and container components (e.g., cans, jar lids and bottle caps) contain tin. The

¹ See, e.g., Rule 13p-1 under the Securities Exchange Act of 1934, as amended, and the rules and regulations of the U.S. Securities and Exchange Commission (the “SEC”) with respect thereto, and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

² As defined in SEC Release No. 34-67716 (August 22, 2012)

Company also has determined that its can-making and transit packaging machinery and equipment products, as well as the tools (and spare parts) that it makes for transit packaging, may contain 3TG. Because the Company is typically several tiers removed from the smelter or refiner and mineral origin of products in its supply chain, the Company relies principally on its direct suppliers to provide it with sourcing information. The Company therefore contacts, on an annual basis, all of the first-tier suppliers of tinplate steel for its metal packaging business and almost all of the first-tier suppliers for its can-making business and transit packaging machinery, equipment and tool-making business to request information regarding the source and chain of custody of 3TG minerals in its supply chain. To facilitate the collection of complete, accurate, standardized and verifiable information, the Company relies primarily on the Conflict Minerals Reporting Template (the “CMRT”) made available by the RMI. The CMRT facilitates the transfer of information through the supply chain regarding country of origin, mine location and smelters and refiners used.

Upon receipt of completed CMRTs from its suppliers, the Company assesses the due diligence efforts of any identified smelter or refiner by examining the information provided in the CMRT to determine if the smelter or refiner has been validated under the RMI’s RMAP as “Conformant.” The RMAP provides information regarding those smelters or refiners that, following an independent third-party audit, have been found to be compliant with the RMAP’s assessment protocols to assure sourcing of only conflict-free materials. Where information from the RMI is not available, the Company conducts its own diligence, which includes: contacting its first-tier suppliers for additional information, conducting internet research and analyzing the likelihood that the 3TG originated from a Covered Country based on the smelter’s location.

The Company continues to evaluate its relationships with its suppliers based upon the respective responses of such suppliers and its own due diligence. In all written contracts with tinplate steel suppliers, and in most written contracts with suppliers to its machinery, equipment and tool-making businesses, the Company includes an obligation of the supplier to cooperate in its efforts to eliminate conflict minerals from the supply chain. The Company’s Supplier Code of Conduct includes a provision regarding responsible sourcing (Origin Mapping). Suppliers who do not comply with the Company’s conflict minerals policy and procedures may be denied future business by the Company and those who violate contractual provisions or policies are subject to enforcement actions by the Company.