

# Crown Human Rights Policy

Crown 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<sup>1</sup>, and seek to secure the fundamental human rights of all our stakeholders, wherever they may be.

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

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

Crown's Human Rights Policy applies to all employees, directors and officers of Crown and its affiliates worldwide<sup>2</sup>. Its purpose is to guide Crown management and support employees to achieve the goals described above. In addition, third-party contractors working at Crown's premises are expected to comply with this Policy.

Our responsibilities include 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 often strive to set higher standards for employee human rights, consistent with our strategic vision. In countries where the legislation does not address the basic human rights principles that inform Crown's conduct, we aim to offer the same level of employee protection as is afforded elsewhere in our operations, while recognizing that policies may need to take account of local culture, conditions and regulations. Where national law and international human rights standards differ, we will follow the higher standards to the extent it is legal to do so; where they are in conflict, we will adhere to national law, while seeking ways to respect employee human rights in line with our strategic vision.

Crown promotes the approach described above with its third-party contractors 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. We commit to implementing due diligence processes with our core raw materials and core service suppliers to avoid indirectly benefitting from or promoting any breaches of national laws or international human rights standards. Crown 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. Crown works to identify, prevent and mitigate adverse human rights impacts caused by our business activities through human rights due diligence and preventive compliance processes.

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 and closures that provide the maximum protection for nutritious food and beverages, we also manufacture 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.

<sup>1</sup> As used in this Policy, the term "employee" applies both to permanent and temporary employees.

<sup>2</sup> Crown's Transit Packaging Division (Signode) has a parallel Human Rights Policy established by that Division. To view the Transit Packaging Division's Policy, please go [here](#).



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**Safe working conditions are paramount**

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

The safety and the health of our employees, third-party contractors 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. This is endorsed by the [Health and Safety Policies and Procedures](#) of our [Code of Business Conduct and Ethics](#).

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.

**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.

[Crown’s Modern Slavery Statement](#) has been published on our website. This statement aligns with the relevant legislation on the subject, including the UK Modern Slavery Act 2015. This statement sets out the steps taken by Crown to ensure that human trafficking and all forms of modern slavery do 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. Persons under 18 are never employed in our operations at night or in hazardous conditions.

Through our [Supplier Code of Conduct](#), Crown works in collaboration with third-party contractors and suppliers to prevent and prohibit any use of child labor under the legal working age.



Family day, Kechnec, Slovakia



**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 the law and commit to maintaining a constructive dialogue with them. Crown is committed to bargaining in good faith with the chosen representatives of its employees and within the appropriate national legal frameworks.

**Regular employment is provided**

All our employees work pursuant to a regular pattern or patterns defined in their working contracts, working conditions or collective agreements, as applicable.

**Working hours are not excessive**

Basic and over-time working hours comply with applicable laws, regulations and 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 demand**

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**

Crown treats all employees and third-party contractors with fairness, respect and dignity. Crown 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 Crown’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, Crown is committed to offering equality of opportunity when hiring, developing, compensating or considering individuals for promotion, termination or retirement, without discrimination. Crown’s decisions rely on qualifications, skills, performance and experience.

**Open dialogue with local communities is favored**

Crown seeks to foster an open dialogue with local communities. Where people in local communities may be affected by our activities, we seek to identify adverse human rights impacts of those activities and take appropriate steps to avoid and/or mitigate them. To support this, we provide guidance to our businesses on engaging with local stakeholders and managing the process of receiving and responding to community complaints.

Crown respects the rights of Indigenous People as defined by applicable law and international human rights standards.



## Use of conflict minerals is avoided

In its efforts to promote Human Rights where it can and to operate in compliance with applicable laws, Crown 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 accountabilities

The company senior executives have endorsed this Policy and are responsible for promoting it at all of our locations. Senior executives inform Crown's Board of Directors at least annually on salient compliance risks related to this Policy.

Crown works to ensure that all employees and third-party contractors are informed of, understand and put this Policy into practice in the scope of their duties. Alongside regular communication, managers and employees will receive relevant training on how to implement this Policy in their day-to-day jobs.

We will make sure this Policy is well-publicized together with our other Company policies, notably the [Code of Business Conduct and Ethics](#), the [Anti-Corruption Policy](#), the [Supplier Code of Conduct](#) as well as facility-level policies and procedures to follow in case of employee grievances. These policies are aligned with the general principles set forth in this Human Rights Policy.

The above implies rights and responsibilities for employees. If an employee becomes aware of human rights abuse within our operations or supply chain, there are four ways to report it: (1) to a supervisor, (2) to a plant manager or the equivalent, (3) to the Business HR Director or (4) the Division Compliance Officer, without fear of reprisal or of breach of confidentiality.

If an employee feels hesitant in any way about reporting such a possible violation as described above, s/he may also report it to Crown's Business Ethics Line ("CBE Line") as described in [Crown's Whistleblowing and Business Ethics Hotline Policy](#). Local communities or external business associates, such as Crown suppliers, third-party contractors or Customers, may also report potential violations to the CBE Line.



## Consequences of violation of the policy

Crown will take appropriate action against any employees, third-party contractors, suppliers, Customers or business associates who violate this Policy.

Crown employees found to have violated this Policy may be subject to disciplinary action, up to and including termination, and other consequences prescribed by law. Where third parties fail to honor their obligations hereunder, Crown may terminate contractual relationships, demand the removal of certain personnel from Crown locations or invoke other contractual rights. Any investigation concerning an alleged violation of this Policy will be conducted in a neutral, transparent and objective manner and will comply with all applicable local laws and regulations. Crown will not tolerate retaliation or any retribution against anyone who, in good faith, reports a violation of this Policy.

## Review and monitoring

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

The review includes the participation by Crown's most senior managers in the following functions: Human Resources, Legal and Risk Management, in consultation with Crown's Chief Operating Officer.

This Policy is available in all prevailing languages where Crown facilities are located.



**Timothy J. Donahue**

Chairman of the Board, President and Chief Executive Officer

