

Human Rights Engagement

Informed by Internationally-Recognized Standards

Crown Holdings, Inc. (Crown), together with its consolidated subsidiaries (collectively, the “Company”), recognizes that its responsibility to promote human rights where it can make positive contributions and an obligation to operate in compliance with all applicable laws wherever it does business. As part of this, Crown commits to maintaining the highest standards of ethics and employee rights. This means that we respect and, where necessary, act to protect the fundamental human rights of all our employees. To this end, we developed a Human Rights Policy 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.

Stakeholder Protection

Our Human Rights engagement also extends to the sphere of conflict minerals. Crown, as a large metal packaging manufacturing company that purchases tin, has identified conflict minerals as a key risk on human rights. To this end, we developed a [Conflict Minerals Policy](#) to ensure 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 Company aims to avoid the use of conflict minerals in the manufacture of its products and to comply with its reporting obligations under applicable law. Accordingly, the Company has implemented due diligence measures for tracing and sourcing Tin, Tantalum, Tungsten and Gold (3TG) in its products designed in conformance with the due diligence related steps of the framework in The Organization 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.

Our commitment to upholding human rights standards in the manufacturing of our products considers the impact on potentially affected stakeholders throughout the value chain, including:

- Internal stakeholders (employees)
- External stakeholders (supply chain workers and local communities)
- Disadvantaged and marginalized stakeholders including children, women, indigenous peoples, people belonging to ethnic or other minorities, or persons with disabilities.



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Human Rights Impact Assessments

We are performing Human Rights Impact Assessments across our global footprint and analyze the actual and potential impact on human rights of stakeholders and evaluate effective outcomes of our Human Rights Policy. Due to the local nature of human rights, we are following a regional approach to these assessments. To date, we have completed regional Human Rights Impact Assessments in our Brazil and Mexico operations, with the process expanding to Europe, Middle East and Africa (EMEA). Similar efforts in Asia Pacific and North America will follow .

Our Human Rights Impact Assessments consider the following criteria:

- Our [Human Rights Policy](#) is communicated to all employees by training;
- Key stakeholders are considered as part of the Human Rights due diligence process;
- Policies and processes are in place to ensure respect for the rights and interests of women, in accordance with international standards;
- Free, Prior, and Informed Consent (FPIC) of Indigenous Peoples, in accordance with international standards;
- Rights of local communities.

