

GENERAL POLICY

It is the policy of Crown Holdings, Inc. and its subsidiary companies that every director, officer and employee shall at all times and in all ways respect and obey both the letter and the spirit of applicable laws, rules and regulations and that every employee shall strive to adhere to the highest standards of ethics, morality, honesty and decency in the performance of the duties of his or her job. Crown also expects every third party with whom Crown has an active commercial relationship for the supply of goods or services, which includes suppliers of raw materials and machinery, suppliers of other goods and services, contractors, consultants, brokers and agents to abide by the principles in this Code in the manner set forth in the

SPECIFIC POLICIES

To ensure that every employee adheres to the General Policy, Crown has adopted several specific policies, set forth below. Although the specific policies do not cover every conceivable situation an employee may face, they address certain issues that may arise. If any employee has any questions about whether certain conduct is lawful or otherwise meets Crown standards, that employee should immediately ask his or her supervisor, plant manager or the Legal Department in his or her Division. Unless otherwise noted, the specific policies and references to Crown or its subsidiaries. Crown will implement the specific policies in a manner consistent with the applicable laws, rules and regulations in the jurisdictions in which Crown Holdings, Inc. and its subsidiaries conduct business.

POLICY ON CONFLICTS OF INTEREST AND CORPORATE OPPORTUNITIES

interests of Crown. A conflict situation can arise when an employee, officer or director takes actions or has interests that may make it difficult to perform his or her work for Crown objectively and effectively; for example, if he or she has a role in an organization that does business with or competes against Crown. Conflicts of interest also arise when an employee, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the company. Any Crown employee, officer or director who has a question regarding a potential conflict of interest should consult with the Legal Department in his or her Division.

Corporate Opportunities

obtain clearance for any trade from the Legal Department in advance of the actual trade. Any Crown employee who has a question about the propriety of his or her conduct under this policy should seek advice

Because Crown is an issuer subject to the securities regulation laws of the United States, the prohibitions on insider trading involving Crown stock apply to Crown employees, agents, managers, officers and directors throughout the world.

POLICY ON DEALINGS ABROAD

Sanctions

Crown must comply with applicable economic and trade sanctions programs and laws. For example, the U.S. Office of Foreign Assets Control enforces U.S. restrictions on conducting business with certain countries, entities and individuals.

Antiboycott

Crown must comply with applicable antiboycott laws. For example, U.S. antiboycott laws generally prohibit U.S. companies and their worldwide subsidiaries from cooperating with international boycotts which the U.S. government does not sanction. A boycott occurs when a person or group of people refuse to do business with certain other people or countries.

Export Control Laws

Crown must comply with all applicable national and multinational export control laws. For example, U.S. export control laws apply to the export and re-export of U.S. goods and technology. Under certain circumstances, these laws prohibit U.S. companies and subsidiaries of U.S. companies, including those located outside the United States, from dealing directly or indirectly with particular countries with respect to certain transactions.

Any Crown employee who has a question regarding the applicability of sanctions, antiboycott or export control laws should consult with the Legal Department in his or her Division.

ANTI-CORRUPTION POLICY

No Crown employee, officer, director or independent third party acting on behalf of the company may pay, offer or promise to pay, or authorize payment to any party, public or private, in any country, in order to secure an improper benefit for the company. Nor may they accept or

anything of value, whether tangible or intangible (e.g., gifts, entertainment, travel expenses, charitable donations, political contributions, hiring an individual or relative).

-Corruption and Anti-Money Laundering Certifications

Gifts, Donations, Entertainment and Favors

Crown recognizes that the occasional exchange of business courtesies, such as modest gifts, meals and entertainment (including invitations to attend sporting events or holiday parties), is a common practice meant to create goodwill and establish trust in relationships. Therefore, this policy is not intended to preclude the giving or acceptance of such common courtesies, provided that the value of the gratuity is nominal in relation to the circumstances in which it is offered and accepted or in accordance with generally accepted business practices of the country and industry and is not intended to influence the business decisions of the person involved. Employees should avoid any conduct which even creates an impression of impropriety. An employee who is offered or receives a gift of a nature that would contravene this policy should politely decline or return the gift.

No Crown employee may give or accept anything of greater than nominal value to or from any current or prospective customers, suppliers, vendors, public or political party officials or other persons in similar positions. The giving or acceptance of cash gifts (including cash equivalents such as stocks or bonds), personal loans, discounts or any other gift or favor that may be considered a bribe or a kickback or other illegal or unethical payment is strictly prohibited regardless of value. In addition, Crown employees may not solicit gifts, gratuities or meal or entertainment invitations from anyone with whom Crown does, or is negotiating to do, business. Under no circumstances may Crown corporate funds be unlawfully used for political contributions of any sort.

This policy is intended to apply to all Crown employees, officers and directors, and any members of their immediate families, as well as independent third parties acting on behalf of the company, including third-party agents, distributors, consultants, contractors and lobbyists and further details and examples of potential issues. If a covered person has any question about the application of this policy, the person should disclose the circumstances involved and seek

Anti-Corruption Policy Handbook for

ANTITRUST AND COMPETITION LAW POLICY

Crown competes vigorously, fairly and independently for business in every ethical way in every area of every market for Crown products. The antitrust and competition laws of the countries in which Crown does business are ()-4c4rqf(viprodu)3(c)4(t)-11(s.)-200()-199(The)5()-199(a)4(anti)-

The Divisional President and Sales Vice Presidents and the Legal Department share them before extending different discounts, rebates, allowances or other price adjustments or different terms or conditions of sale to different customers for the same product or if you have any questions or concerns and any time you need assistance in understanding or complying with this policy.

ENVIRONMENT, HEALTH & SAFETY POLICY

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 long-term success.

To implement the policy, Crown and its employees will:

safety standards and policies.

increasing awareness and knowledge among all levels of employees and commit to the protection and well-being of each employee.

Promote pollution prevention with an emphasis on source reduction and resource conservation and include environmental, health and safety considerations among the criteria by which projects, products, processes and purchases are evaluated.

POLICY ON TRADE SECRETS AND CONFIDENTIAL INFORMATION

Business Information

Crown employees deal on a daily basis with information about the company and its businesses. This information includes business plans, manufacturing processes and technology, marketing and pricing information, customer lists and plans for new businesses and ventures. anyone else outside the company.

Each Crown employee should assume that all such information is confidential (except in those circumstances where Crown has disclosed the information in published reports or where the employee can otherwise verify that the information is publicly known). Similarly, each Crown employee should assume that all information disclosed to Crown by its customers and suppliers is confidential (except in those circumstances where the customer or supplier has

POLICY ON FINANCIAL REPORTING

To report a suspected violation to the Crown Compliance Office, an employee may either write or phone the following Compliance Officers: