

SILGAN HOLDINGS INC.

CODE OF BUSINESS CONDUCT AND ETHICS

Purpose

Our Mission Statement provides that our primary mission is to compete and win in the markets served and that we should be the best at what we do. Our Mission Statement also provides that, in pursuit of this mission, we will hold ourselves to the highest standards of ethical behavior in our internal and external relationships, engendering employee pride in the conduct as well as the achievements of the organization. The success of our business is dependent on the trust and confidence we earn from our employees, customers, stockholders and other constituencies by meeting the standards of our Mission Statement.

The purpose of this Code of Business Conduct and Ethics (this “Code”) is to provide a guide to assist members of our Board of Directors and our officers and employees (“Silgan Team Members”) in meeting the standards of our Mission Statement. This Code is not intended to cover every law applicable to our business or every situation that may arise. Any questions regarding this Code, any other policies of the Company or any other matters relating to business conduct or ethics should be referred to the Company’s Legal Department.

Policy on Compliance with Laws and on Business and Ethical Conduct

It is the policy of the Company that all activities of the Company be conducted in accordance with all applicable laws and regulations. The Company fully expects that all Silgan Team Members will comply with both the letter and spirit of such laws and regulations when engaging in Company activities. This includes, without limitation, laws and regulations regarding anti-bribery, anti-corruption, anti-trust, child labor, discrimination, environmental matters, health and safety, sanctions, securities and other matters applicable to our business. In the conduct of its business, the Company expects that Silgan Team Members will engage in vigorous and fair competition, while adhering to applicable laws and regulations, including all applicable competition laws. Additionally, in the conduct of the Company’s business, no Silgan Team Member or agent acting on behalf of the Company is authorized to give or receive bribes, directly or indirectly, nor shall any Silgan Team Member or agent acting on behalf of the Company give or receive gifts or payments which are, or may be construed as being, a bribe. The Company does not expect Silgan Team Members to be experts on all laws and regulations that govern our business, but it does expect Silgan Team Members to seek guidance from the Company’s Legal Department when there are any questions or doubts.

Policy on Conflicts of Interest

All Silgan Team Members have a duty of loyalty to the Company and to act in the best interest of the Company. A conflict of interest is generally any activity or arrangement that is opposed to the best interests of the Company. A conflict of interest may arise when a Silgan Team Member is influenced by considerations of personal gain or benefit or by gain or benefit to relatives or other acquaintances, which may conflict with such Team Member’s obligation to serve the Company’s best interest or which may impair such Team Member’s ability to make unbiased decisions for the Company. All Silgan Team Members should try to be aware of potential conflicts of interest and situations that might appear to be a conflict of interest and avoid conflicts of interest at all times. If you have any questions regarding conflicts of interest, please contact the Company’s Legal Department.

Related Party Transactions

The Company may have transactions, agreements or arrangements with entities or persons that are considered related parties under applicable securities laws. If a related party transaction is required to be disclosed by the Company in its public filings with the Securities and Exchange Commission, such related party transaction is required to be approved by the Audit Committee of the Company's Board of Directors. Any Silgan Team Member that knowingly enters into, or proposes to enter into, any transaction with a related party of any member of the Board of Directors, any officer of the Company or such Silgan Team Member must report such related party transaction to the Company's Legal Department. Generally, a related party of a person includes family members of a person and entities that are controlled, directly or indirectly, by such person or family members of such person. If you have any questions regarding a related party transaction or a possible related party transaction, please contact the Company's Legal Department.

Other Company Policies

All Silgan Team Members are required to comply with all other applicable policies of the Company, including the Company's policies regarding confidential information of the Company, trading restrictions for the Company's securities including with respect to material, non-public information, protection and use of Company property and all other applicable policies of the Company. If you have questions concerning any of such policies, please contact the Company's Legal Department.

Policy on Reporting Violations

If you know or have genuine suspicions of any violation of this Code or any other applicable policies of the Company, you should report it to the Company's Legal Department. If such violation involves the Company's Legal Department, you should report it to either the Company's CEO or CFO. Silgan Team Members are required to cooperate in any investigation conducted by the Company as a result of any such report.

It is the policy of the Company that retaliation is prohibited against any Silgan Team Member who makes a report in good faith where it is reasonable to believe a violation of this Code has or may have occurred, even if there is an ultimate finding that no such violation occurred or if there is insufficient conclusive evidence to make such a finding. It is also the policy of the Company that retaliation is prohibited against any Silgan Team Member who participates in good faith in an investigation as a result of any such report.

Policy on Waivers

All Silgan Team Members have the personal responsibility to follow the principles set forth in this Code. Behavior or actions that violate the principles set forth in this Code will be subject to disciplinary action including, where appropriate, termination.

Any waiver of any provision of this Code for any member of the Board of Directors or executive officer of the Company must be approved by the Board of Directors of the Company (excluding, as applicable, any Director seeking such waiver). Any such waiver for a Director or executive officer of the Company may be disclosed if and as required by the Securities and Exchange Commission or the New York Stock Exchange. Complying with this Code by obtaining permission where applicable will not be deemed a waiver of any provision of this Code.

Effective February 22, 2023