

**SILGAN HOLDINGS INC.**  
**CORPORATE GOVERNANCE GUIDELINES**

**Introduction**

These Corporate Governance Guidelines have been established by the Board of Directors of Silgan Holdings Inc. (the “Company”) and provide a general structure within which our Directors and management can effectively work to benefit the Company, its stockholders and other constituencies. The Board of Directors of the Company intends that these guidelines serve as a flexible framework within which the Board of Directors of the Company and management may conduct their work, not as a set of binding legal obligations. These guidelines should be interpreted in the context of all applicable laws, the Company’s organizational documents and other applicable documents and policies. The Board of Directors of the Company may amend or modify these guidelines at any time in its sole discretion.

**I. Director Qualification Standards**

A majority of Directors of the Company must be “independent” under (i) the listing standards of the New York Stock Exchange (the “NYSE”) and under (ii) the Securities Exchange Act of 1934, as amended. In determining whether a Director is independent, the Board of Directors of the Company will broadly consider all relevant facts and circumstances, including that the Director has no material relationship with the Company. Directors who are determined to be independent shall be considered “independent Directors” for purposes of these guidelines.

**II. Director Responsibility**

The overarching responsibility of the Directors is to direct the management of the business and affairs of the Company by exercising their business judgment in good faith and acting in what they reasonably believe to be in the best long-term interests of the Company and its stockholders and other constituencies. Directors are expected to review meeting materials in advance of Board of Directors meetings and to attend Board of Directors meetings.

**III. Board Committees**

At all times, the Board of Directors of the Company will have an Audit Committee, Compensation Committee and Nominating Committee. Each committee shall be composed solely of independent Directors who meet the standards established by the NYSE and the Securities and Exchange Commission (“SEC”) for service on the respective committee. The key responsibilities of these committees shall be set forth in their respective charters. The Board of Directors of the Company may, from time to time, establish or maintain such additional committees that it determines to be appropriate.

**IV. Director Access to Management and Independent Advisors**

Directors shall have full access to management and employees of the Company. The Board of Directors of the Company and its committees are authorized to consult with such independent advisors as they deem appropriate.

**V. Executive Sessions of Independent Directors**

The independent Directors of the Company shall meet at regularly scheduled meetings of the Board of Directors of the Company without Directors who are not independent and without management.

## **VI. Director Compensation**

The Compensation Committee will review and make recommendations to the Board of Directors of the Company with respect to the compensation of Directors.

## **VII. Director Orientation and Continuing Education**

A new Director shall be provided such orientation for the Company as the Company shall determine. Directors are encouraged to participate in continuing education programs.

## **VIII. Director Service on Other Public Boards**

Except as otherwise approved by the Board of Directors of the Company, Directors shall not serve on more than three (3) boards of public companies in addition to the Company's Board of Directors.

## **IX. Management Succession**

The Board of Directors of the Company shall oversee the development of a succession plan for the Chief Executive Officer and other senior management of the Company.

## **X. Annual Performance Evaluation of the Board**

The Board of Directors of the Company will conduct an annual evaluation of itself in such manner as it deems appropriate and with such assistance from the Nominating Committee as it shall request.

## **XI. Ethical Conduct**

Directors, as well as officers and employees, are expected to act ethically and adhere to the policies of the Company, including the Company's *Code of Business Conduct and Ethics*.

## **XII. Related Party Transactions**

The Board of Directors of the Company recognizes that transactions involving the Company and related parties present heightened risk of potential or actual conflicts of interest which may interfere – or even appear to interfere – with the interests of the Company. Therefore, it is the policy of the Company that the Audit Committee review all related party transactions, before such transactions are entered into, if possible, which are required to be reported by the Company under the applicable rules and regulations governing related party transactions promulgated by the SEC and approve or ratify such transactions where appropriate.

## **XIII. Communications with Directors**

The Board of Directors of the Company has a formal process for stockholders to send communications to it. Stockholders may send written communications addressed to the Board of Directors of the Company or to any Director of the Company by mail to the Company's office in Stamford, Connecticut. If the Company receives at its office in Stamford, Connecticut any such written communication, the Company will forward such written communication directly to all members of the Board of Directors of the Company or to such Director of the Company, as the case may be, as appropriate.

Effective February 22, 2023.