

GLOBAL BRASS AND COPPER HOLDINGS, INC.

WHISTLEBLOWER POLICY

Statement of Policy

Global Brass and Copper Holdings, Inc. (the “Company”) is committed to providing a workplace conducive to open discussion of our business practices and is committed to complying with the laws and regulations to which we are subject, as well as our Code of Business Conduct and Ethics (our “Code”). Accordingly, the Company will not tolerate conduct that is in violation of such laws, regulations or our Code. All employees and directors are expected to comply with this policy. Each employee has a responsibility to promptly report any suspected misconduct, illegal activities or fraud, including any questionable accounting, internal accounting controls and auditing matters, or other violations of laws or of our Code in accordance with the provision of this policy. Any other third party, such as vendors, customers, stockholders or competitors also may report, under the procedures provided in this policy, a good faith complaint regarding accounting or auditing matters or other violations of laws. In order to facilitate the reporting of communications regarding alleged wrongdoing, the Audit Committee of our Board of Directors (the “Audit Committee”) has established procedures for (i) the submission by employees of reports of alleged wrongdoing and (ii) the receipt, retention and treatment of these reports.

Policy of Non-Retaliation

It is our policy to comply with all applicable laws that protect our employees against unlawful discrimination or retaliation as a result of their lawfully reporting information regarding, or their participation in investigations involving alleged wrongdoing by the Company or its agents. Specifically, our policy is designed to prevent employees from being subject to disciplinary or retaliatory action by the Company or any of its agents or employees as a result of an employee’s:

- disclosing information to a government or law enforcement agency or a representative of the Company, where the employee has a good faith, reasonable belief that the information demonstrates a violation or possible violation of a law, rule or regulation;
- providing information, filing, testifying or participating in a proceeding filed or about to be filed, or otherwise assisting in an investigation or proceeding regarding any conduct that the employee reasonably and in good faith believes involves a violation or possible violation of a law, rule or regulation; or
- providing information to the Company’s representatives or other persons where the employee has a good faith, reasonable belief that the information discloses a violation or possible violation of our Code.

If any employee believes that he or she has been subjected to any discrimination or retaliation or other action by us or our agents for reporting suspected wrongdoing in accordance with this policy, he or she may file a complaint with our General Counsel by following the procedures set forth below under the heading “Method of Reporting.” If it is determined that an employee has experienced any improper employment action in violation of this policy, we endeavor to promptly take appropriate corrective action.

Method of Reporting

The Audit Committee has designated the General Counsel as the Compliance Officer responsible for administering this policy. The Compliance Officer will be assisted by the Chairman of the Audit Committee in the administration of this policy with respect to alleged violations of the Code by individuals other than executive officers and directors. We have established a procedure under which alleged wrongdoing, including alleged wrongdoing relating to questionable accounting, internal accounting controls or auditing matters may be reported anonymously and confidentially. Employees may anonymously report (unless submitted via email) an alleged violation to (i) our Global Brass and Copper Employee Helpline at (1-866) 784-7841, (ii) our Compliance Email Box at www.globalbrassethics.com, or (iii) to c/o Audit Committee, 475 North Martingale Road, Suite 1050, Schaumburg, IL 60173. Reports regarding retaliation for reporting suspected wrongdoing may also be reported by any of these methods.

If a reporting employee wishes to disclose his or her identity, the employee may do so. Confidentiality of the employee submitting the report will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. In the course of any investigation, we may find it necessary to share information with others on a “need to know” basis.

Employees should make every effort to report their concerns using one or more of the methods specified above. The reporting procedure is specifically designed so that employees have a mechanism that allows the employee to bypass a supervisor he or she believes is engaged in prohibited conduct under this policy. Anonymous reports should be factual instead of speculative or conclusory, and should contain as much specific information as possible to allow the persons investigating the report to adequately assess the nature, extent and urgency of the situation. Employees should realize that if an anonymous report cannot be properly investigated without additional information, we may have to close the matter for lack of sufficient information.

Policy for Receiving and Investigating Reports

Upon receipt of any reported violation of the Code by any person other than an executive officer or director of the Company, the General Counsel will determine whether the information alleged in the report alleges or contains allegations that might constitute a violation of the Code. To the extent the General Counsel deems appropriate, he will consult with the director of Internal Audit and appoint one or more internal and/or external investigators to promptly and fully investigate such report under the supervision of the General Counsel. He shall, to the extent deemed appropriate, consult with the Audit Committee with respect to conduct or results of any such investigation. The General Counsel will inform the reporting person (if his or her identity

is known) that the report has been received and, to the extent appropriate, provide him or her with the name of, and contact information for, the investigator assigned to the report.

With respect to any other report pursuant to this policy, upon receipt of such report, the General Counsel will determine whether the information alleged in the report alleges or contains allegations that might constitute wrongdoing. The Audit Committee shall be notified promptly of reports of alleged wrongdoing determined to involve accounting, internal accounting controls and auditing concerns or alleged violations of the Code by executive officers or directors of the Company. The Audit Committee will, to the extent it deems appropriate, appoint one or more internal and/or external investigators to promptly and fully investigate claims of alleged wrongdoing under the supervision of the General Counsel, or, in the case of (i) alleged wrongdoing relating to accounting, internal accounting controls and auditing concerns or (ii) alleged violations of the Code by executive officers or directors of the Company, under the supervision and oversight of the Audit Committee or such other persons as the Audit Committee determines to be appropriate under the circumstances. The General Counsel will inform the reporting person (if his or her identity is known) that the report has been received and, to the extent appropriate, provide him or her with the name of, and contact information for, the investigator assigned to the report.

If the investigation confirms that wrongdoing has occurred, we will promptly take appropriate corrective action with respect to the person(s) involved, including possible termination of such person(s), and will also take appropriate steps to correct and remedy any wrongdoing.

Retention of Reports

The General Counsel will maintain a log of all reports, tracking their receipt, investigation and resolution. Each member of the Audit Committee and, at the discretion of the General Counsel, as appropriate, other personnel involved in the investigation of reports, shall have access to the log. Copies of the log and all documents obtained or created in connection with any investigation will be retained for a period of three years.

APPROVED JULY 20, 2011

REVISED DECEMBER 17, 2012