
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TBC BALL BEVERAGE CAN VIETNAM LIMITED

CERTIFICATE
NUMBER

192

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI ACCREDITED
AUDITOR

LIBERO
ASSURANCE

DATE OF ISSUE

16 MARCH 2022

DATE OF EXPIRY

15 MARCH 2023

CERTIFIED SINCE

16 MARCH 2022

AUTHORISED BY

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at*

www.aluminium-stewardship.org

CERTIFICATION SCOPE

Manufacturing and Supply of Aluminium Beverage
Can Bodies and Can Ends at the TBC Ball
Beverage Can Vietnam Limited plant in Vietnam.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	TBC Ball Beverage Can Vietnam Limited
CERTIFICATION SCOPE	Manufacturing and Supply of Aluminium Beverage Can Bodies and Can Ends at the TBC Ball Beverage Can Vietnam Limited plant in Vietnam.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	LiberoAssurance
AUDIT DATE	<ul style="list-style-type: none">15 – 20 December 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">16 February 2022
AUDIT SCOPE	<p>The audit scope includes the manufacturing and Supply of Aluminium Beverage Can Bodies and Can Ends at the TBC Ball Beverage Can Vietnam Limited plant in Vietnam.</p> <p>The Supply Chain Activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>At the time of the audit (December 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The audit has been undertaken as a 'desktop' exercise, in accordance with the ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Provisional Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.

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- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
 - The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
 - The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
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CERTIFICATION PERIOD 16 March 2022 – 15 March 2023

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DUE DATE 15 September 2022

CERTIFICATE NUMBER 192

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Applicable legal requirements have been identified as required by documented procedure and reviewed for their compliance status monthly. Legal compliance training is provided to employees using an internal on-line training system.
1.2 Anti-Corruption	Conformance	Anti-Corruption requirements and commitments are defined in the Business Ethics Code of Conduct, signed by the General Manager. The Entity has established a hotline available 24 hours a day, seven days a week. This information is displayed at multiple places within the workplace such as production areas and the canteen.
1.3 Code of Conduct	Conformance	Ball Corporation has developed a Business Ethics Code of Conduct which is applicable to the Entity and covers various topics including the vision, commitment and policies and is signed by the General Manager.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has developed and/or implements Ball's corporate Policies on environment, social and governance. The Environment Policy and Health and Safety Policy have been developed and signed by the Country Manager. The Ball Corporate Human Rights Policy which confirms commitment to national and international Human Rights law is applicable to the Entity and is available at: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Plant Manager is responsible for providing the required resources and to periodically review the Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are communicated both internally to employees via training and display at various locations at the plant, and available externally on demand by interested parties. The Policy is available at: https://www.ball.com/getattachment/3dd3f008-3441-4a2a-b13e-a51154373058/CP-03-013-003-COMPL-Environmental-Health-Safety.pdf

CRITERION	RATING	COMMENT
2.2 Leadership	Conformance	The Entity has designated the Plant Manager as having overall responsibility and authority for the implementation of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System, which is certified as per ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a basic Social Management System and underwent a social audit in the June 2021 with follow-up in July 2021.
2.4 Responsible Sourcing	Conformance	<p>The Supplier Guiding Principles provides the basis and conditions for responsible sourcing and has been communicated to suppliers for their commitment. The Entity periodically audits suppliers either on-site or remotely if needed due to covid-19 related restrictions. The Supplier Guiding Principles are available at:</p> <p>https://www.ball.com/getattachment/9199e3dd-aa92-49a8-ae40-63ea9fe3c6d2/Supplier-Guiding-Principles-and-other-exhibits-April2021.pdf</p> <p>Ball's corporate goal is for all Aluminium metal suppliers to be certified to the ASI Performance Standard and other non-metal suppliers to the Sedex audit standard.</p>
2.5 Impact Assessments	Conformance	<p>Ball Corporation implements a Group-wide Impact Assessment procedure for investment which includes impact on sustainability performance among Ball's 'Big 6' categories (energy, water, waste, VOC, gas and safety) and the recently added diversity and inclusion metric.</p> <p>At the Entity, environment impact assessments are undertaken with assistance of external agency/expert as per Vietnam legal requirements, for expansion of line capacity.</p>
2.6 Emergency Response Plan	Conformance	The Entity has developed and implemented an Emergency Response Plan (ERP), which identifies emergency scenarios. Emergency drill records including report and photographs are maintained.
2.7 Mergers and Acquisitions	Conformance	Ball Corporation has developed an internal process for Due Diligence including mergers and acquisitions. There have been no mergers or acquisitions during the past three years at the Entity.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	Ball Corporation has developed an internal process to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There has been no closure, decommissioning and divestment during past three years at the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity discloses its sustainability performance via Ball Corporation's global Sustainability Report, which is in accordance with the Global Reporting Initiative (GRI) protocol: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf There is a collaborative approach to launch sustainability initiatives nationwide, using social media (e.g. Facebook) to create community awareness.
3.2 Non-compliance and liabilities	Conformance	The Entity disclose information on significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in its corporate Sustainability Report: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes payments to governments only for applicable taxes, including VAT, import duty and corporate income tax. This is evidenced by a review of the Financial Audit Report.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented practices for engagement and communication with external stakeholders. There has been no complaint, grievance or request for information from any stakeholder or interested party in the recent past.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Ball Corporation has conducted Life Cycle Assessments of its major products using the 'Instant LCA' tool.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Ball Corporation uses the 'Instant LCA' tool to carry out Life Cycle Assessment following a cradle-to-grave approach. The life cycle stages considered include raw material production, primary packaging,

CRITERION	RATING	COMMENT
		transport, secondary packaging and end-of-life of packaging.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Ball Corporation communicates its Life Cycle Assessments and results on the website and through the Group-wide Sustainability Report, page 22: https://www.ball.com/sustainability/real-circularity/life-cycle-analysis https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
4.2 Product design	Conformance	Based on the principles of life cycle analysis, the focus in the design of products relates to the reduction of the weight of cans, which heavily affects carbon footprint, and on redesigning coatings to reduce substances of concern.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has area/process spoilage targets with the aim to reduce Process Scrap. The printed and unprinted scrap are separated and 100% of the scrap generated is returned to the metal supplier.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Aluminium Process Scrap is collected as bright can and deco (printed), compressed (bailing process) and returned to the metal manufacturer.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy and is working with various stakeholders to improve collection and recycling of Used Beverage Cans (UBC). The country collection rate of UBC is above 90%. The Entity participates in the 'Can 2 Can' program which includes the collect-recycle/re-melt-reuse ecosystem with beverage brands and metal suppliers.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has developed a recycling strategy and is working with various stakeholders to improve collection and recycling of Used Beverage Cans (UBC). The country collection rate of UBC is above 90%. The Entity participates in the 'Can 2 Can' program which includes the collect-recycle/re-melt-reuse ecosystem with beverage brands and metal suppliers.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity calculates its greenhouse gas emissions (Scope 1, 2 and 3) and reports these data to Ball Corporation for publication which are available at: https://www.ball.com/data-center

CRITERION	RATING	COMMENT
5.2 GHG emissions reductions	Conformance	Ball Corporation has established GHG reduction targets at a corporate level as a 55% reduction in GHG emissions by the year 2030, which is further aligned at unit or country level. This 1.5°C target has been approved by the Science Based Target Initiative (SBTi).
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity monitors Emissions to Air on an annual basis, which is conducted by an approved external agency. Parameters were found to be within permissible limits.
6.2 Discharges to Water	Conformance	Process waste water is collected and treated via the waste water treatment plant before treated waste water is discharged to the Government authority. Third party testing reports are available to confirm treated waste water quality parameters.
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	The Entity has conducted a risk assessment for Spills and Leakage and has implemented actions to prevent Spills and Leakage. Whilst records relating to the systems and monitoring of Spills and Leakages were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	The Entity has implemented Standard Operating Procedures (SOP's) to manage any Spills and Leakage as well external communication. Whilst records relating to the systems and monitoring of Spills and Leakages were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place to disclose to affected parties the details of any significant Spills. Chemical spill kits are provided and employees are trained to handle Spills as well as reporting to supervisor and responsible person(s).

CRITERION	RATING	COMMENT
		There has been no Spill reported during the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has procedures in place to disclose to affected parties details of any significant Spills. There has been no Spill reported during the past three years.
6.5a Waste management and reporting (strategy)	Unable to Rate	The Entity implements a procedure on waste management describing its waste management strategy. The reporting of waste generated and associated disposal methods is undertaken in accordance with local laws. Whilst records relating to the systems and monitoring of waste management were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
6.5b Waste management and reporting (disclosure)	Unable to Rate	The reporting of waste generated and the associated disposal methods is undertaken on an annual basis in accordance with local laws and included in corporate sustainability reporting as aggregated global data: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf Whilst records relating to the systems and monitoring of waste management were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a water assessment to include process/flow line diagrams and quantities. The Entity receives 100% water intake from the industrial park authority, with no borewells or groundwater extraction.
7.1b Water assessment (risk assessment)	Conformance	The Entity has undertaken a water-related risk assessment as part of its environment risk assessment and according mitigation plans have been implemented.
7.2a Water management (management plans)	Unable to Rate	The Entity has implemented time bound plans to reduce water consumption which is measured in terms of per thousand Cans manufactured in an aggregated manner. Whilst records relating to the systems and monitoring of water management were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
7.2b Water management (monitoring)	Unable to Rate	Water intake, discharge and process consumption data is monitored and periodic review of the progress of water management plans is undertaken.

CRITERION	RATING	COMMENT
		Whilst records relating to the systems and monitoring of water management were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
7.3 Disclosure of water usage and risks	Conformance	The Entity has strategic plans documented to mitigate water related risk. Data are included in the Sustainability Report: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity has developed a biodiversity checklist in consultation with an external expert, which is completed annually. Increasing green Increasing the area of vegetation is an ongoing process. The Entity maintains a list of trees planted and survival rate.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity Action Plan has been developed based on the outcomes of the biodiversity risk assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed following stakeholder consultation and with consideration of the Biodiversity Mitigation Hierarchy. The biodiversity risk assessment determined there is no material risk on biodiversity from the Entity's operations.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity performance is communicated to stakeholders through various means including the corporate Sustainability Report: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
8.3 Alien Species	Conformance	The Entity has conducted a risk assessment for Alien Species. All the wooden pallets are handed as per applicable work instructions, including heat treatment and labelling as per the International Standard for Phytosanitary Measure (ISPM 15).
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy confirming its commitment to national and international Human Rights law covering employees, business partners and Local Communities, available at: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process which includes measures taken to identify, prevent, evaluate and mitigate actual and potential Human Rights risks.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a Human Rights Due Diligence process and defines remediation measures should the Entity identify as having caused or contributed to adverse Human Rights impacts.
9.2 Women’s Rights	Conformance	Women’s rights are defined in the Employees Code of Conduct as well as in the policy on prevention of sexual harassment of women at workplace. Regular committee meetings are conducted. Management is aiming to increase diversity and the Entity has developed a target of 30 percent of women employees by 2025 in line with Ball Corporation’s global target.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity is located within an industrial park and there are no Indigenous Peoples identified.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity is located within an industrial park and there are no Indigenous Peoples identified.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sacred or cultural heritage sites and values within the Entity’s Area of Influence.

CRITERION	RATING	COMMENT
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI.
9.7a Local Communities (rights and interests)	Unable to Rate	The Entity respects the rights and interests of Local Communities and has assessed the impact on Local Communities in the Human Rights Impact Assessment. The Entity's operations do not have a negative impact on the local livelihoods. Whilst records relating to the systems and monitoring of Local Communities were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
9.7b Local Communities (impacts)	Unable to Rate	The Entity has assessed the impact of its business activities on the Local Community as part of its Human Rights Impact Assessment. The Entity has implemented actions including creating employment and provision of associated services such as canteen and transportation, which positively impacts livelihoods within the Local Community. Whilst records relating to the systems and monitoring of Local Communities were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
9.7c Local Communities (livelihoods)	Unable to Rate	The Entity has assessed the impact of its business activities on the Local Community as part of its Human Rights Impact Assessment. The Entity has implemented actions including creating employment and provision of associated services such as canteen and transportation, which positively impacts livelihoods within the Local Community. The Entity has implemented various social activities under its corporate social responsibility (CSR) initiatives, including the concept of a 'Community Ambassador' where employees are encouraged to do voluntary work. Whilst records relating to the systems and monitoring of Local Communities were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.

CRITERION	RATING	COMMENT
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has evaluated its supply chain and identified where adverse Human Rights impacts in Conflict-Affected and High-Risk Areas may occur. The Entity requires its suppliers sign an additional certification document regarding conflict minerals. Ball Corporation's global Conflict Minerals Report 2020 is available at: https://www.ball.com/getattachment/82f1e762-7739-44d3-939c-ee8160d20f16/Ball-2021-Conflict-Minerals-Report.pdf
9.9 Security practice	Conformance	The Entity's Human Rights Policy stipulates adopting proportionate security arrangements. The Entity ensures that the provision of security is consistent with local laws and relevant international standards and guidelines.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Unable to Rate	The Entity has developed a Human Rights Policy which addresses a commitment to respect Freedom of Association in line with national and international laws. Whilst records relating to the systems and monitoring of Freedom of Association were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Unable to Rate	The Entity has developed a Human Rights Policy which addresses a commitment to respect the right to Collective Bargaining in line with national and international laws. Whilst records relating to the systems and monitoring of Collective Bargaining were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Vietnam law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Unable to Rate	The Entity has developed a procedure on regulating Human Rights and labour matters, covering Child Labour. Vietnam labour law states the minimum hiring age is 15 years and the Entity's minimum hiring age is 18 years. There is no evidence of Child Labour at the Entity. Whilst records relating to the systems and monitoring of Child Labour were reviewed and assessed as being in conformance, this Criterion

CRITERION	RATING	COMMENT
		will be re-assessed during the on-site component of the audit.
10.2b Child Labour (hazardous)	Unable to Rate	<p>The Entity has a zero tolerance policy on Child Labour. The Child Labour Policy has been developed which neither uses nor supports the use of Child Labour in hazardous work areas. The minimum hiring age is 18 years. There is no evidence of Child Labour at the Entity. The Entity continues to be vigilant through global policies and programs complemented with regular audits within the supply chain.</p> <p>Whilst records relating to the systems and monitoring of Child Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.2c Child Labour (worst forms)	Unable to Rate	<p>The Entity has a zero tolerance policy on Child Labour. The Child Labour Policy has been developed which neither uses nor supports the use of Worst Form of Child Labour. There is no evidence of Child Labour at the Entity. The Entity continues to be vigilant through global policies and programs complemented with regular audits within the supply chain</p> <p>Whilst records relating to the systems and monitoring of Child Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.3a Forced Labour (human trafficking)	Unable to Rate	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour as per the commitment in the Human Rights Policy, Child and Forced Labour Policy and Supplier Guiding Principles. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. Recruitment is undertaken by the Human Resources Department directly. Please see:</p> <p>https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.3b Forced Labour (deposits, fees, advances)	Unable to Rate	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor

CRITERION	RATING	COMMENT
		<p>supports the use of Forced Labour nor demands any deposits from its employees. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.3c Forced Labour (migrant workers)	Unable to Rate	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour or uses Migrant Workers. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.3d Forced Labour (debt bondage)	Unable to Rate	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not practice Debt Bondage through advance payment. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.3e Forced Labour (freedom of movement)	Unable to Rate	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not restrict freedom of movement of Workers inside</p>

CRITERION	RATING	COMMENT
		<p>work areas. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Unable to Rate</p>	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not retain employees' original education, training or identity certificates. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
<p>10.3g Forced Labour (freedom to terminate employment)</p>	<p>Unable to Rate</p>	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and allow its employees to terminate their contract with a reasonable length of notice as per mutually agreed employment contract. Please see: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>Whilst records relating to the systems and monitoring of Forced Labour were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
<p>10.4 Non-Discrimination</p>	<p>Unable to Rate</p>	<p>The Entity had developed a procedure to regulate Human Rights and labour matters. The Entity also</p>

CRITERION	RATING	COMMENT
		<p>implements the Ball global Discrimination, Harassment and Retaliation Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>There is no evidence of Discrimination at the Entity. Whilst records relating to the systems and monitoring of Discrimination were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.5 Communication and engagement	Unable to Rate	<p>The Entity has developed various communication channels including display on notice boards and various committees. The Entity engages with employees through various channels including employee engagement surveys, High Performance Organization Survey (HPO), electronic suggestion box using QR code and town hall meetings. Whilst records relating to the systems and monitoring of communication and engagement were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>
10.6 Disciplinary practices	Unable to Rate	<p>The Entity provides an employee handbook to every employee which contains relevant information including Disciplinary rules. The global Ball Corporation Policy 'Workplace Threats and Violence' provides for a procedure on how to manage employees who make substantial threats, exhibit substantial threatening behaviour, or engages in violent acts on Ball Corporation property, including unacceptable disciplinary practices by personnel. Please see: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.7a Remuneration (living wage)	Unable to Rate	<p>The Entity has undertaken a living wage survey to determine basic needs of Workers. The Entity provides remuneration equal to and/or above the legal minimum wage which cover basic needs and some discretionary income. Whilst records relating to the systems and monitoring of Remuneration were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.</p>

CRITERION	RATING	COMMENT
10.7b Remuneration (method of payment)	Unable to Rate	The wages are paid by the fifth day of each month via bank transfer. The social security contribution (employee 10.5% and employer 21.5%) is paid monthly to cover the unemployment benefit, sick/medical benefits and occupational accidents. Whilst records relating to the systems and monitoring of Remuneration were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
10.8 Working Time	Unable to Rate	The Entity records the Working Time of all its employees including contractors. Whilst records relating to the systems and monitoring of Working Time were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and Ball Corporation has Global Health and Safety Policy: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and which applies to all Workers and Visitors present in any area or for activities under the Entity's control: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and includes management commitment to comply with applicable national and international law on Workers' health and safety: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and reaffirms that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.2 OH&S Management System	Conformance	The Entity is certified to ISO 45001:2018. There is an Integrated Management System (IMS) Manual

CRITERION	RATING	COMMENT
		covering ISO 45001 requirements supported by OH&S procedures. Employees, including contract Workers, have been trained on OH&S topics in accordance with the annual SHE training calendar.
11.3 Employee engagement on health and safety	Unable to Rate	The Entity has a Health and Safety Committee in accordance with Vietnam Occupational Safety and Health law. Whilst records relating to the systems and monitoring of the OH&S Management System were reviewed and assessed as being in conformance, this Criterion will be re-assessed during the on-site component of the audit.
11.4 OH&S performance	Conformance	There Entity has developed OH&S performance indicators such as the Total Recordable Injury Rate (TRIR), which is reported monthly in the EHS Scorecard.

Document Control and Version History

Revision	Date	Notes
0	16 March 2022	Initial Certification Audit – Provisional Certification