
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

TBC BALL BEVERAGE CAN VIETNAM LIMITED

CERTIFICATE
NUMBER

192

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

LIBERO
ASSURANCE

DATE OF ISSUE

26 JUNE 2022

DATE OF EXPIRY

25 JUNE 2025

CERTIFIED SINCE

15 MARCH 2022

AUTHORISED BY

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Aluminium Stewardship Initiative Ltd
ACN 606 661 125, Australia
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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 (15 – 20 December 2021)Surveillance Audit (25 – 28 April 2022) |
| AUDIT FIRM | LiberoAssurance |
| AUDIT DATE | <ul style="list-style-type: none">15 – 20 December 2021 (Initial Certification Audit)25 – 28 April 2022 (Surveillance Audit) |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">16 February 2022 (Initial Certification Audit)30 May 2022 (Surveillance Audit) |
| AUDIT SCOPE | <p><u>Initial Certification Audit (15 – 20 December 2021)</u></p> <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>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p> <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> |

Surveillance Audit (25 – 28 April 2022)

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.

The Supply Chain Activities included in the audit scope:

- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the audit scope with a focus on those requiring on-site assessment following the previous 'desktop' audit.

AUDIT
OUTCOME

Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- ☑ The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- ☑ 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.

CERTIFICATION
PERIOD

26 June 2022 – 25 June 2025

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

25 June 2023

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 | <p>The Entity has developed an Emergency Response Plan (ERP), which identifies emergency scenarios and emergency contact persons, both internal and external. Detailed work instructions have been developed to handle each type of emergency situation.</p> <p>Emergency drill records are maintained. The most recent fire drill was conducted in April 2022, in coordination with the government's fire police team.</p> |
| 2.7 Mergers and Acquisitions | Conformance | Ball Corporation has developed an internal process for Due Diligence including mergers and |

| CRITERION | RATING | COMMENT |
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| | | acquisitions. There have been no mergers or acquisitions during the past three years at the Entity. |
| 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- |

| CRITERION | RATING | COMMENT |
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| | | grave approach. The life cycle stages considered include raw material production, primary packaging, 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: |

| CRITERION | RATING | COMMENT |
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| | | https://www.ball.com/data-center |
| 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) | Conformance | The Entity has conducted a risk assessment for Spills and Leakage and has implemented actions to prevent Spills and Leakage. |
| 6.3b Assessment and Management of Spills and Leakage (management) | Minor Non-Conformance | The Entity has implemented Standard Operating Procedures (SOP's) to manage any Spills and Leakage as well external communication. However, implementation of the spills management plan is not effective, including instances of improper handling of chemicals/substances. |
| 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). 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. |

| CRITERION | RATING | COMMENT |
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| | | There has been no Spill reported during the past three years. |
| 6.5a Waste management and reporting (strategy) | Conformance | 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. |
| 6.5b Waste management and reporting (disclosure) | Conformance | 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 |
| 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. |
| 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. |

| CRITERION | RATING | COMMENT |
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| 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

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| 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. There are no borewells nor 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) | Conformance | 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. |
| 7.2b Water management (monitoring) | Conformance | The water consumption data (intake, used, treated and discharged) are metered and recorded in accordance with the water management plan. Responsibilities have been assigned. Periodic invoices for water consumption and treatment of effluent are received by VSIP (the Industrial zone authority). |
| 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

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| 8.1 Biodiversity assessment | Conformance | The Entity has developed a biodiversity checklist in consultation with an external expert, which is completed annually. Increasing the area of vegetation is an ongoing process. The Entity maintains a list of trees planted and tracks the survival rate of these trees. |
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| CRITERION | RATING | COMMENT |
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| 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. |
| 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 |

| CRITERION | RATING | COMMENT |
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| | | 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. |
| 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) | Conformance | 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. The Entity respects the rights of Local Communities and delivers initiatives in the areas of education, can recycling and tree plantation: https://www.ball.com/our-company/ball-in-the-community |
| 9.7b Local Communities (impacts) | Conformance | 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 |

| CRITERION | RATING | COMMENT |
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| | | 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 respects the rights of Local Communities and delivers initiatives in the areas of education, can recycling and tree plantation: https://www.ball.com/our-company/ball-in-the-community |
| 9.7c Local Communities (livelihoods) | Conformance | 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. The Entity provides job opportunities to local community members and part of the workforce belong to local communities. |
| 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) | Conformance | The Entity has developed a Human Rights Policy which addresses a commitment to respect Freedom of Association in line with national and international laws. A Trade Union is in operation and the chairman is democratically elected and there is signed agreement. Employees have a choice to join the union and all employees are members, with exception of those under a probation period. |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | 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. |

| CRITERION | RATING | COMMENT |
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| 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) | Conformance | 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. |
| 10.2b Child Labour (hazardous) | Conformance | 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. |
| 10.2c Child Labour (worst forms) | Conformance | 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. |
| 10.3a Forced Labour (human trafficking) | Conformance | 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: 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 |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | 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 nor demands any deposits from its employees. Please see: |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| | | 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 |
| 10.3c Forced Labour (migrant workers) | Conformance | <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:</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> |
| 10.3d Forced Labour (debt bondage) | Conformance | <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:</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> |
| 10.3e Forced Labour (freedom of movement) | Conformance | <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 work areas. 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> |
| 10.3f Forced Labour (retention of identity papers, permits, certificates) | Conformance | <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:</p> |

| CRITERION | RATING | COMMENT |
|---|-------------|---|
| | | 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 |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | <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:</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> |
| 10.4 Non-Discrimination | Conformance | <p>The Entity had developed a procedure to regulate Human Rights and labour matters. The Entity also implements the Ball global Discrimination, Harassment and Retaliation Policy:</p> <p>https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> |
| 10.5 Communication and engagement | Conformance | <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, a High Performance Organization Survey (HPO), an electronic suggestion box using QR code and 'town hall' meetings.</p> <p>The Entity has developed an annual training plan and annual employee engagement plan for 2022.</p> |
| 10.6 Disciplinary practices | Conformance | <p>The Entity provides an employee handbook to every employee which contains relevant information including Disciplinary rules. The Entity has a Social Network Using Policy and employee training has been provided. 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:</p> |

| CRITERION | RATING | COMMENT |
|---|-------------|--|
| | | https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf |
| 10.7a Remuneration (living wage) | Conformance | 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. |
| 10.7b Remuneration (method of payment) | Conformance | The Entity pays wages 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. The government authority ensures the social insurance contribution is correct. |
| 10.8 Working Time | Conformance | The Entity records the Working Time of all its employees including contractors. The Entity operates 24 hours a day, seven days a week. The weekly rest day and other national/festival holidays are provided. The working hours policy and practices meet the national legal requirement. |
| 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 a 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 |

| CRITERION | RATING | COMMENT |
|---|-----------------------|--|
| | | 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 | Minor Non-Conformance | The Entity is certified to ISO 45001:2018. There is an Integrated Management System (IMS) Manual covering ISO 45001 requirements supported by Occupational Health and Safety (OH&S) procedures. Employees, including contract Workers, have been trained on OH&S topics in accordance with the annual training calendar. However, there is a lack of effectiveness in the OH&S risk assessment and practices, including the chemical storage area and the electrical panel safety risk assessment. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has developed an annual training plan with an objective to engage and train its employees, including contract Workers. The Entity has a Health and Safety Committee in accordance with Vietnam Occupational Safety and Health law. |
| 11.4 OH&S performance | Conformance | The Entity has developed OH&S performance indicators such as the Total Recordable Injury Rate (TRIR), which is reported monthly in the EHS Scorecard. However, the reporting of OH&S performance was not undertaken correctly for the Permit to Work safety procedures. |

Document Control and Version History

| Revision | Date | Notes |
|----------|---------------|---|
| 0 | 16 March 2022 | Initial Certification Audit – Provisional Certification |
| 1 | 26 June 2022 | Surveillance Audit – Certification |