

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

BALL BEVERAGE PACKAGING SOUTH AMERICA (BPSA)

CERTIFICATE
NUMBER

154

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

PROVISIONAL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV
BUSINESS
ASSURANCE
SERVICES UK
LTD.

DATE OF ISSUE

8 NOVEMBER 2021

DATE OF EXPIRY

7 NOVEMBER 2022

CERTIFIED SINCE

8 NOVEMBER 2021

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

Regional managing activities conducted at the headquarters in Sao Jose dos Campos (Brazil).
Manufacturing of beverage can bodies at the Argentina (Argentina), Aguas Claras (Brazil), Brasilia (Brazil), Chile (Chile), Extrema (Brazil), Frutal (Brazil), Jacarei (Brazil) and Santa Cruz (Brazil) facilities.

Manufacturing of beverage can ends at the Manaus (Brazil) facility.

Manufacturing of beverage can bodies and ends at the Paraguay Can Bodies and Can Ends (Paraguay), Pouso Alegre (Brazil), Recife Can Bodies and Can Ends (Brazil) and Tres Rios (Brazil) facilities.

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging South America (BPSA)
CERTIFICATION SCOPE	<p>Regional managing activities conducted at the headquarters in Sao Jose dos Campos (Brazil).</p> <p>Manufacturing of beverage can bodies at the Argentina (Argentina), Aguas Claras (Brazil), Brasilia (Brazil), Chile (Chile), Extrema (Brazil), Frutal (Brazil), Jacarei (Brazil) and Santa Cruz (Brazil) facilities.</p> <p>Manufacturing of beverage can ends at the Manaus (Brazil) facility.</p> <p>Manufacturing of beverage can bodies and ends at the Paraguay Can Bodies and Can Ends (Paraguay), Pouso Alegre (Brazil), Recife Can Bodies and Can Ends (Brazil) and Tres Rios (Brazil) facilities.</p>
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	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none">• 19 July – 13 August 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 1 September 2021
AUDIT SCOPE	<p>The audit scope covers Ball Beverage Packaging South America (BPSA) at headquarters in Sao Jose dos Campos (Brazil) with virtual site tours of Aguas Claras (Brazil), Brasilia (Brazil), Extrema (Brazil) and Recife Can Bodies (Brazil) for beverage can bodies manufacturing and Recife Can Ends (Brazil) for beverage can ends manufacturing.</p> <p>The ASI multi-site sampling approach was undertaken to include the Argentina (Argentina), Chile (Chile), Frutal (Brazil), Jacarei (Brazil), Manaus (Brazil), Paraguay Can Bodies and Can Ends (Paraguay), Pouso Alegre (Brazil), Santa Cruz (Brazil) and Tres Rios (Brazil) facilities.</p> <p>The supply chain activities included in the audit scope:</p>

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- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

At the time of the Audit (July - August 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 ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and Webex Video Conferencing to provide a site tour and enable interviews.

AUDIT
OUTCOME

- Provisional 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

8 November 2021 – 7 November 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

7 May 2022

CERTIFICATE
NUMBER

154

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Evidenced that the Entity has systems in place to maintain knowledge and compliance with the laws applicable to its business in the social, economic/governance and environmental spheres. Evidenced the Global Corporate Compliance Policy to ensure legal compliance in all areas.
1.2 Anti-Corruption	Conformance	Evidenced that the Entity will act against Corruption in all its forms, including Extortion and Bribery, maintaining a Corporate Anti-Corruption Policy that describes compliance with anti-corruption laws in Ball's operating countries and prohibits all forms of bribery and corruption. For more information, access Ball's Supplier Guiding Principles available at: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework
1.3 Code of Conduct	Conformance	Evidenced that the Entity has implemented a Code of Conduct that includes relevant principles for environmental, social and governance performance. For more information, access Ball's Business Ethics Code of Conduct at: https://www.ball.com/codeofconduct
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Evidenced that the Entity is committed to the good management of its environmental aspects and social and governance processes through the implementation and maintenance of its various policies. Evidenced that all global policies are developed at the Denver headquarters and undergo periodic review, with regions and plants adding policies and/or other documentation that apply at the local level.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Evidenced that the Entity's Global Senior Leadership endorses Ball's policies and procedures, as well as in South America with the local Integrated Management System Policy, which is regularly reviewed during the annual Critical Analysis and Risk Assessment.

CRITERION	RATING	COMMENT
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Evidenced that the Entity frequently communicates its policies and engagement initiatives through various internal communication channels - email, bulletin boards, events, Ball Connect. Ball also communicates externally some of its main policies, such as the Human Rights and Respect at Work Policy. For more information, access the Human Rights Policy at: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights
2.2 Leadership	Conformance	Evidenced that the Entity has appointed its Vice President of Procurement to be the senior leadership role with overall authority to ensure compliance with the requirements of the ASI Performance Standards. Meetings were held with senior management and leaders to ensure engagement and alignment with the Certification.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Evidenced that the Entity maintains multisite certification for all its factories in accordance with ISO 14001:2015, documenting and implementing robust and integrated Environmental, Social and Quality Management Systems.
2.3b Environmental and Social Management Systems (social)	Conformance	Evidenced that the Entity maintains a structured Social Responsibility System, being evaluated by accredited bodies to carry out audits in the SMETA social protocol (Sedex Members Ethical Trade Audit) requested by clients to assess social performance.
2.4 Responsible Sourcing	Conformance	Evidenced that the Entity requires its suppliers, especially those of metals, to comply with Ball's Supplier Guiding Principles. The principles were developed with input from key stakeholders, including customers and investors, and require Ball's suppliers to comply and demonstrate them. They cover legal, labour, human rights, environment, health and safety, antitrust, bribery and anti-corruption, tax compliance, sanctions and compliance practices. For more information access Ball's Supplier Guiding Principles at: www.ball.com/responsible-sourcing-framework For more information access the link: https://www.ball.com/responsible-sourcing
2.5 Impact Assessments	Conformance	Evidenced that the Entity conducts environmental, social, cultural and Human Rights Impact Assessments, including a gender analysis, for new

CRITERION	RATING	COMMENT
		<p>projects or major changes to existing facilities, in accordance with the procedures of the Human Resources, Corporate Communications and EHS teams. For the scenario of building a new plant, for example, specific and multidisciplinary forums were created to assess all aspects and impacts of Ball's operations, in addition to seeking opportunities for internal improvement and interaction with the communities where we conduct our business. Market surveys are carried out to define the appropriate salary range, simulation of quotas for People with disabilities, women, apprentices, among others, and goals, indicators and action plans are established to face possible difficulties. For the Regional Headquarters redeployment scenario, several assessments were carried out and several measures taken to provide the best conditions for the transfer of personnel, even during the COVID-19 pandemic.</p> <p>These and other aspects are included in Ball BPSA's Change Management tool for BPSA to ensure their assessment and implementation for other new projects.</p>
2.6 Emergency Response Plan	Conformance	<p>Evidenced that the Entity has a Global Emergency Response Policy and has developed its Crisis Management Plan accordingly. In addition, it has a specific Emergency Response Plan for each plant, which aim to identify, assess, avoid and mitigate impacts on key stakeholders. The program includes employee orientation or instruction and specific emergency response training.</p>
2.7 Mergers and Acquisitions	Conformance	<p>Evidenced that the Entity has a globally administered process to become familiar with the social, environmental and governance aspects of a potential acquisition that is treated confidentially and personalized for each merger and/or acquisition. Ball follows all Applicable Laws, locally and globally.</p> <p>Evidenced that after the Board has defined the continuity of the process, a specialized external consultancy is hired to assist the company in the Due Diligence process, forming a multidisciplinary internal team to work on the project, including Legal, Operations, HR, EHS, among others, to assess all aspects and risks relevant to the business and report to Ball for review prior to acquisition.</p> <p>During the project, in addition to the usual legal issues, environmental and social responsibility</p>

CRITERION	RATING	COMMENT
		issues are analyzed, as well as to define the actions to be taken by the company, ensuring that there will be no risks to Ball's operations or to stakeholders, such as violations of human rights or environmental or community liabilities in general.
2.8 Closure, Decommissioning and Divestment	Conformance	Evidenced that the Entity analyzes environmental, social and governance issues in the plant closure / decommissioning planning processes, in accordance with all applicable legislation, in collaboration with the Legal, EHS and HR teams in particular. Evidenced that specialized consultants are hired to assess the local collective agreement, collective agreements in force at the time of the facts, among other relevant processes and documents to ensure the Entity leaves the place, equipment and employees in the best possible condition, free from liability, and with all necessary and/or appropriate referrals and socio-environmental agreements.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Evidenced that the Entity publicly discloses its governance approach and its material environmental, social and economic impacts, through publication of the Sustainability Report every 2 years in accordance with the Global Reporting Initiative (GRI) Standard and detailing progress towards sustainability goals. For more information see: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
3.2 Non-compliance and liabilities	Conformance	Evidenced that the Entity defined the disclosure of fines, judgments, penalties and non-monetary sanctions for non-compliance with applicable legislation with specific thresholds each, e.g. for environmental non-compliance, a value above US\$10,000 was defined, as appointed in the GRI (Global Reporting Initiative) report.
3.3a Payments to governments (legal and contractual)	Conformance	Evidenced that the Entity only makes payments on to governments on a legal and/or contractual basis, in accordance with policies and the Code of Conduct. Evidenced that payments are made by the Global Business Services (GBS) team after several internal approvals and documentation verification that follow a Competency Policy. Taxes are paid to the government on a legal basis and the entire payment stream is verified internally.

CRITERION	RATING	COMMENT
		For more information access the link: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
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	Evidenced that the Entity must implement accessible, transparent, understandable and gender-sensitive and culturally sensitive grievance resolving mechanisms, adequate to handle the grievances, complaints and requests for information from interested parties related to its operations. Evidenced that interested parties can forward complaints, grievances and other requests to: comunidades@ball.com available at the Entity's website: www.ball.com/sa/about-ball/contact-us/ball-contact-information
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Evidenced that the Entity assessed the life cycle impacts of its main product lines in conjunction with specialized consultants and also using internal tools to identify opportunities. In 2020, LCA (Life Cycle Assessment) comparative analysis was published, reviewed by peers, for aluminum beverage cans, PET and glass bottles, as well as carton packaging for beverages, in Brazil, Europe and the United States. The study was conducted independently by Sphera Consulting and the information, assumptions, system limits and LCA results are public and properly referenced when communicated externally.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Evidenced that the Entity assessed the life cycle impacts of its main product lines in conjunction with specialized consultants and also using internal tools to identify opportunities in our operations. In 2020, a LCA (Life Cycle Assessment) comparative analysis was published, reviewed by peers, for aluminum beverage cans, PET and glass bottles, as well as carton packaging for beverages, in Brazil, Europe and the United States. The study was conducted independently by Sphera Consulting and the information, assumptions, system limits and LCA results are public and properly referenced when communicated externally.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Evidenced that the Entity assessed the life cycle impacts of its main product lines in conjunction with specialized consultants and also using internal tools to identify opportunities in our operations. In 2020, a LCA (Life Cycle Assessment) comparative analysis was published, reviewed by peers, for aluminum beverage cans, PET and glass bottles, as well as carton packaging for beverages, in Brazil, Europe and the United States. The study was conducted independently by Sphera Consulting and the information, assumptions, system limits and LCA results are public and properly referenced when communicated externally.</p> <p>For more information access the link: https://www.ball.com/Ball/media/Ball/Global/Sustainability/LCA-presentation-BRAZIL.pdf</p> <p>For more information access the link: https://www.ball.com/goals</p>
4.2 Product design	Conformance	<p>Evidenced that the Entity defined the goal of producing 80% of global beverage cans with weight-optimized STARcan dome designs. That, combined with Ball Aerosol lightweight ReAl® alloy goal, Ball will save more than 320,000 metric tonnes of greenhouse gas emissions during the first five years of the 2020-2030 goal period.</p> <p>Evidenced the Entity's goal of 30% energy efficiency improvement (electricity and natural gas) in can manufacturing (2020-2030).</p> <p>For more information, access the link: https://www.ball.com/goals</p> <p>For more information access "Vision for a Perfect Circle" at the link: https://www.ball.com/realcircularity</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>Evidenced that the Entity allocates 100% of its scrap for recycling and that the Entity seeks to minimize the generation of Aluminium Process Scrap from its own operation through improvement projects and initiatives with the Engineering and Lean teams. The generated scrap is sent to duly qualified suppliers for recycling and manufacturing of new aluminum products.</p> <p>In addition, each plant has its own segregation processes driven by supplier specifications as well as aluminum availability and recycling requirements.</p> <p>Evidenced that the sale of scrap is part of the contractual obligations for most of the metal supplies that purchase aluminum scrap from Ball</p>

CRITERION	RATING	COMMENT
		<p>and provide the Entity their own scrap segregation specifications for aluminum scrap.</p> <p>For more information access Ball's 2020 Sustainability Report, pages 6 and 10: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Evidenced that the Entity allocates 100% of its scrap for recycling and that the Entity seeks to minimize the generation of Aluminium Process Scrap from its own operation through improvement projects and initiatives with the Engineering and Lean teams. The generated scrap is sent to duly qualified suppliers for recycling and manufacturing of new aluminum products.</p> <p>Evidenced that the plants that produce beverage cans and ends segregate the aluminium scraps by type, and hence, by alloys, before being sent for recycling.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>Evidenced that the Entity has a strategy to increase recycling rates in countries where they are low through projects, activities and specific targets suitable for the market. For countries where recycling is already consolidated, the Entity works with projects to maintain this volume and also to make consumers aware of conscious consumption. For more information access the link: #VADELATA Communication Campaigns for Recycling and Conscious Consumption at: https://www.ball.com/vadelata https://www.instagram.com/vadelata https://www.facebook.com/vadelata</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>Evidenced that the Entity maintains campaigns aimed at collecting and recycling aluminum cans, sometimes developing donation actions that benefit the community surrounding the factories.</p> <p>Evidenced that the Entity has a strategy to increase recycling rates in countries where they are low through projects, activities and specific targets suitable for the market. For countries where recycling is already consolidated, the Entity works with projects to maintain this volume and also to make consumers aware of conscientious consumption.</p> <p>For more information, access the links: https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/recycling/south-america and:</p>

CRITERION	RATING	COMMENT
		<p>https://www.abralatas.org.br/ministerio-do-meio-ambiente-assina-termo-de-compromisso-da-lata-de-aluminio-para-bebidas/ and #VADELATA Communication Campaigns for Recycling and Conscious Consumption at: https://www.ball.com/vadelata https://www.instagram.com/vadelata https://www.facebook.com/vadelata</p>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	<p>Evidenced that the Entity is committed to reducing its greenhouse gas (GHG) emissions through various initiatives to mitigate its impact on the global climate.</p> <p>Evidenced that the Entity disclosed its GHG emission reduction target together with the Science-Based Targets initiative so that its operations do not cause impacts that will cause the planet to exceed the increase in temperature by 1.5°C, consistent with the level of decarbonization needed to limit global warming to less than 2°C compared to pre-industrial temperatures, according to COP 21. By 2030, the Entity is committed to achieving a 55% absolute reduction in GHG emissions (Scope 1 and 2), based on the year 2017. In addition, Ball is committed to reducing the absolute GHG emissions in its value chain by 16% – from mining, refining, smelting, smelting and rolling, to ball manufacturing, logistics and recycling.</p> <p>For more information, access the Sustainability Report, pages 6 and 10: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports</p>
5.2 GHG emissions reductions	Conformance	<p>Evidenced that the Entity developed, approved and launched its GHG emission reduction target together with the Science-Based Target initiative so that its operations do not cause impacts that will contribute to exceed the increase of temperature by 1.5°C in the planet, consistent with the level of decarbonization needed to limit global warming to less than 2°C compared to pre-industrial temperatures, according to COP 21. By 2030, Ball is committed to achieving a 55% absolute reduction in GHG emissions (Scope 1 and 2), based on the year 2017. In addition, Ball is committed to reducing the absolute GHG emissions in its value chain by 16% – from mining, refining, smelting, smelting and rolling, to ball manufacturing, logistics and recycling.</p>

CRITERION	RATING	COMMENT
		For more information, access the Sustainability Report, pages 6 and 10: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
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	Evidenced that the Entity quantifies and reports emissions to the atmosphere that have adverse effects on human beings or the environment and implement plans to minimize these adverse impacts, with targets and plans to minimize the emissions of these components according to the strategy in the region and / or in the most critical plants. Evidenced that the Entity periodically quantifies and reports atmospheric emissions through the control of VOCs (Volatile Organic Compounds) resulting from operations. For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports and: https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative and: https://www.ball.com/na/vision/sustainability/our-approach/goals
6.2 Discharges to Water	Conformance	Evidenced that the Entity quantifies and reports Discharges to Water that have adverse effects on human beings or the environment and that it implements plans to minimize these adverse impacts. Considering the majority of water consumption at the plants comes from operations and, to reduce the impact, the Entity established new projects to install machinery with better environmental performance and cutting-edge technologies to reduce consumption and generate effluent water. For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports

CRITERION	RATING	COMMENT
		https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative https://www.ball.com/na/vision/sustainability/our-approach/goals
6.3a Assessment and Management of Spills and Leakage (assessment)	Unable to Rate	<p>Evidenced that the Entity has a Crisis Management Plan for each plant, an Emergency Response Plan and Environmental Assessment and Impact, including hazards and risks to assess the main risk areas of operations where leaks can contaminate the air, water and / or soil, among other risks. In addition, the containment of tanks in order to prevent leaks is part of mandatory items and legal requirements, which are constantly reviewed by the Entity. Based on this, stakeholder communication and management plans, compliance controls and a local monitoring program are implemented to prevent and detect Spills and Leakages. All of these procedures follow the guidelines established by Ball's Global Emergency Response Plan. In the case of any event and/or spill, Ball has a reporting hierarchy to communicate the volume, type and potential impact of what happened immediately after an incident to all stakeholders. These incidents are publicly reported in accordance with local law, in context and proportions and, when significant (spills, fines and penalties above \$10,000 or equivalent when converted from local currency), also at Ball's GRI Content Index. Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Unable to Rate	<p>Evidenced that the Entity has a Crisis Management Plan for each plant, an Emergency Response Plan and Environmental Assessment and Impact, including hazards and risks to assess the main risk areas of operations where leaks can contaminate the air, water and / or soil, among other risks. In addition, the containment of tanks in order to prevent leaks is part of mandatory items and legal requirements, which are constantly reviewed by the Entity. Based on this, stakeholder communication and management plans, compliance controls and a local monitoring program are implemented to prevent and detect Spills and Leakages. All of these procedures follow the guidelines established by Ball's Global Emergency Response Plan.</p>

CRITERION	RATING	COMMENT
		<p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
<p>6.4a Reporting of Spills (immediate disclosure)</p>	<p>Conformance</p>	<p>Evidenced that the Entity has a Crisis Management Plan for each plant, an Emergency Response Plan and Environmental Assessment and Impact, including hazards and risks to assess the main risk areas of operations where leaks can contaminate the air, water and / or soil, among other risks. In addition, the containment of tanks in order to prevent leaks is part of mandatory items and legal requirements, which are constantly reviewed by the Entity. Based on this, stakeholder communication and management plans, compliance controls and a local monitoring program are implemented to prevent and detect Spills and Leakages. All of these procedures follow the guidelines established by Ball's Global Emergency Response Plan. In the case of any event and/or spill, Ball has a reporting hierarchy to communicate the volume, type and potential impact of what happened immediately after an incident to all stakeholders. These incidents are publicly reported in accordance with local law, in context and proportions and, when significant (spills, fines and penalties above \$10,000 or equivalent when converted from local currency), also at Ball's GRI Content Index.</p>
<p>6.4b Reporting of Spills (regular reporting)</p>	<p>Conformance</p>	<p>Evidenced that the Entity has a Crisis Management Plan for each plant, an Emergency Response Plan and Environmental Assessment and Impact, including hazards and risks to assess the main risk areas of operations where leaks can contaminate the air, water and / or soil, among other risks. In addition, the containment of tanks in order to prevent leaks is part of mandatory items and legal requirements, which are constantly reviewed by the Entity. Based on this, stakeholder communication and management plans, compliance controls and a local monitoring program are implemented to prevent and detect Spills and Leakages. All of these procedures follow the guidelines established by Ball's Global Emergency Response Plan. In the case of any event and/or spill, Ball has a reporting and reporting hierarchy to communicate the volume, type and potential impact of what happened immediately after an incident to all stakeholders. These incidents are publicly reported</p>

CRITERION	RATING	COMMENT
		<p>in accordance with local law, in context and proportions and, when significant (spills, fines and penalties above \$10,000 or equivalent when converted from local currency), also at Ball's GRI Content Index.</p>
<p>6.5a Waste management and reporting (strategy)</p>	<p>Unable to Rate</p>	<p>Evidenced that the Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy, aiming to reduce waste generation and increase recycling rates in countries where this is not satisfactory.</p> <p>Evidenced that the Entity defined the waste generation reduction goals, unfolded through the Big 6 Goals, following action plans in accordance with the Waste Mitigation Hierarchy (Reduce, Reuse and Recycle) and Solid Waste Management Plans of each plant.</p> <p>This information is monitored internally, classified into types of waste and disposal methods, and publicly disclosed in the Sustainability Report and GRI Content Index.</p> <p>For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/data-center https://www.ball.com/na/vision/sustainability/our-approach/goals</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
<p>6.5b Waste management and reporting (disclosure)</p>	<p>Unable to Rate</p>	<p>Evidenced that the Entity has implemented a waste management strategy that is designed in accordance with the Waste Mitigation Hierarchy, aiming to reduce waste generation and increase recycling rates in countries where this is not satisfactory.</p> <p>Evidenced that the Entity defined the waste generation reduction goals, unfolded through the Big 6 Goals, following action plans in accordance with the Waste Mitigation Hierarchy (Reduce, Reuse and Recycle) and Solid Waste Management Plans (PGRS) of each plant.</p> <p>This information is monitored internally, classified into types of waste and disposal methods, and publicly disclosed in the Sustainability Report, page 10.</p> <p>For more information, access the links:</p>

CRITERION	RATING	COMMENT
		https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/data-center https://www.ball.com/na/vision/sustainability/our-approach/goals Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site 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 (state 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.
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.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	<p>Evidenced that the Entity is committed to responsibly collecting, using and managing the water resources of its Area of Influence, identifying and mapping its abstraction and use of water (by source and types), ensuring compliance and monitoring of local legislation, conditions and allocations granted, in addition to developing initiatives and projects for the management and reduction of water consumption.</p> <p>For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/na/vision/sustainability/our-approach/goals https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</p>
7.1b Water assessment (risk assessment)	Conformance	<p>Evidenced that the Entity is committed to responsibly collecting, using and managing the water resources of its Area of Influence, identifying and mapping its abstraction and use of water (by source and types), ensuring compliance and monitoring of local legislation, conditions and allocations granted, in addition to developing initiatives and projects for the management and reduction of water consumption.</p> <p>Evidenced that the Entity, since 2013, uses the tools developed by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI) to map its facilities in relation to the stress areas of watersheds. Ball's Corporate Sustainability team conducts a high-level water risk analysis each year, covering all Ball locations, including Ball Corporation BPSA. In this case, the main tool used to assess areas of water stress and make better water-related decisions is the Aqueduct (WRI).</p> <p>Evidenced that the Entity has additionally developed an assessment of local water-related risks in the Hydrographic Basins where Ball BPSA plants are located, using the WWF Water Risk Filter tool to understand the risks associated with our operating units. The result was low risk for most of its plants and, in general, given the history and nature of Ball's industrial activity, there is no major risk of water supply or watershed compromise. In any case, Ball remains committed to developing a climate change adaptation plan and making employees aware of the conscious and sustainable use of natural resources.</p>

CRITERION	RATING	COMMENT
		<p>For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/na/vision/sustainability/our-approach/goals https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</p>
7.2a Water management (management plans)	Unable to Rate	<p>Evidenced that the Entity is committed to responsibly collecting, using and managing the water resources of it's Area of Influence, identifying and mapping its abstraction and use of water (by source and types), ensuring compliance and monitoring of local legislation, conditions and allocations granted, in addition to developing initiatives and projects for the management and reduction of water consumption.</p> <p>Evidenced that the Entity, since 2013, uses the tools developed by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI) to map its facilities in relation to the stress areas of watersheds. Ball's Corporate Sustainability team conducts a high-level water risk analysis each year, covering all Ball locations, including Ball Corporation BPSA. In this case, the main tool used to assess areas of water stress and make better water-related decisions is the Aqueduct (WRI).</p> <p>Evidenced that the Entity has additionally developed an assessment of local water-related risks in the Hydrographic Basins where Ball BPSA plants are located, using the WWF Water Risk Filter tool to understand the risks associated with our operating units. The result was low risk for most of its plants and, in general, given the history and nature of Ball's industrial activity, there is no major risk of water supply or watershed compromise. In any case, Ball remains committed to developing a climate change adaptation plan and making employees aware of the conscious and sustainable use of natural resources.</p> <p>For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/na/vision/sustainability/our-approach/goals https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not</p>

CRITERION	RATING	COMMENT
		possible. This Criterion will be fully assessed during the next on-site audit
7.2b Water management (monitoring)	Unable to Rate	<p>Evidenced that the Entity is committed to responsibly collecting, using and managing the water resources of its Area of Influence, identifying and mapping its abstraction and use of water (by source and types), ensuring compliance and monitoring of local legislation, conditions and allocations granted, in addition to developing initiatives and projects for the management and reduction of water consumption.</p> <p>Evidenced that the Entity, since 2013, uses the tools developed by the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI) to map its facilities in relation to the stress areas of watersheds. Ball's Corporate Sustainability team conducts a high-level water risk analysis each year, covering all Ball locations, including Ball Corporation BPSA. In this case, the main tool used to assess areas of water stress and make better water-related decisions is the Aqueduct (WRI).</p> <p>Evidenced that the Entity has additionally developed an assessment of local water-related risks in the Hydrographic Basins where Ball BPSA plants are located, using the WWF Water Risk Filter tool to understand the risks associated with our operating units. The result was low risk for most of its plants and, in general, given the history and nature of Ball's industrial activity, there is no major risk of water supply or watershed compromise. In any case, Ball remains committed to developing a climate change adaptation plan and making employees aware of the conscious and sustainable use of natural resources.</p> <p>For more information, access the links: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports https://www.ball.com/na/vision/sustainability/our-approach/goals https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit</p>
7.3 Disclosure of water usage and risks	Conformance	Evidenced that the Entity publicly discloses its global water use in absolute terms and per 1000

CRITERION	RATING	COMMENT
		<p>cans produced in Ball's Sustainability Report and Data Center. As part of the Sustainability Report, Ball also reports the results of the latest annual global water risk analysis. Using the WRI Aqueduct tool, it was found that the majority of the global beverage packaging plants (57%) are in low to medium risk water locations, with 23% in medium to high risk areas. However, 18.5% are in high risk areas, with the remaining 1.5% designated as extremely high risk. For Ball Corporation BPSA plants, no water-related risks were identified in the analysis conducted and therefore these data have not been disclosed but are available for possible consultation with interested parties.</p> <p>For more information access the link, pages 7 – 8 and 10: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>Evidenced that the Entity assessed the risks and materiality of impacts on biodiversity of land use and activities in the Entity's Area of Influence using IBAT (Integrated Biodiversity Assessment Tool), as well as the Geospatial Data Management System (SIGEO) tool. As a result of the assessment, it was determined none of the Ball facilities in South America are located in nationally protected areas. For more information access the biodiversity section at the link: https://www.ball.com/sa/vision/sustainability/operations and: https://www.ball.com/getmedia/66ca1bd5-184d-4f3d-862c-46c37364ab28/One_Page_Biodiversidade_BallBP_SA_EN.pdf.aspx</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>Evidenced that the Entity implemented a Biodiversity Checklist in each of the factories to carry out a qualitative survey of the current situation of each unit with regards to the permeable area, fauna, flora and biodiversity management, encouraging the application of the Biodiversity Mitigation Hierarchy (prevent, reduce, restore, compensate) and creating space to establish action plans and measure effectiveness.</p> <p>Evidenced that the Entity assessed the risks and materiality of impacts on biodiversity of land use and activities in the Entity's Area of Influence using IBAT (Integrated Biodiversity Assessment Tool), as</p>

CRITERION	RATING	COMMENT
		well as the Geospatial Data Management System (SIGEO) tool. As a result of the assessment, it was determined none of the Ball facilities in South America are located in nationally protected areas.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	Evidenced that the Entity developed and implemented action plans to provide benefits to biodiversity and assessed the risks and materiality of impacts on biodiversity of land use and activities in the Entity's Area of Influence using IBAT (Integrated Biodiversity Assessment Tool). For more information access the link: https://www.ball.com/getmedia/66ca1bd5-184d-4f3d-862c-46c37364ab28/One_Page_Biodiversidade_BallBP_SA_EN.pdf.aspx
8.2c Biodiversity management (reporting)	Conformance	Evidenced that the Entity assessed the risks and materiality of impacts on biodiversity of land use and activities in the Entity's Area of Influence using IBAT (Integrated Biodiversity Assessment Tool), as well as the Geospatial Data Management System (SIGEO) tool. As a result of the assessment, it was determined none of the Ball facilities in South America are located in nationally protected areas. For more information access the biodiversity section at link: https://www.ball.com/sa/vision/sustainability/operations
8.3 Alien Species	Conformance	Evidenced that the Entity proactively prevents the accidental or deliberate introduction of exotic species that may have significant adverse impacts on fauna and flora by monitoring biodiversity in its Area of Influence through IBAT (Integrated Biodiversity Assessment Tool) and for new projects, the Change Management tool and the checklist are used to assess impacts on biodiversity. For more information access the biodiversity section at link: https://www.ball.com/sa/vision/sustainability/operations
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 mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

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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	Evidenced that the Entity has defined its commitment to respecting Human Rights through a Corporate Human Rights Policy. For more information access the Human Rights Policy at the link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights
9.1b Human Rights Due Diligence (process)	Conformance	Evidenced that the Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, (based on the United Nations Guiding Principles on Business and Human Rights) , and the established principles were endorsed in the Universal Declaration of Human Rights and the International Labor Organization (ILO), as well as observing the rights of Indigenous Peoples, among others, based on respect for the dignity of the individual, without distinction of any kind.
9.1c Human Rights Due Diligence (remediation)	Conformance	Evidenced that the Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, (based on the United Nations Guiding Principles on Business and Human Rights) , and the established principles were endorsed in the Universal Declaration of Human Rights and the International Labor Organization (ILO), as well as observing the rights of Indigenous Peoples, among others, based on respect for the dignity of the individual, without distinction of any kind. Evidenced that the Entity, during the Human Rights Due Diligence process, did not cause or contribute to adverse impacts on Human Rights, without any need of redress through legitimate processes in their Area of Influence.
9.2 Women's Rights	Conformance	Evidenced that the Entity has implemented policies and processes to ensure respect for the rights and interests of women, in accordance with international standards, including the United

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		<p>Nations Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW). Evidenced of the commitment to diversity and inclusion and the Entity is also developing initiatives, global and regional goals to promote the inclusion of women, black people, the LGBTQI+ community and other under-represented groups. For more information access the links: https://www.ball.com/na/vision/sustainability/our-approach/goals https://www.ball.com/na/about-ball/careers/diversity-inclusion/d-i-goals</p>
9.3 Indigenous Peoples	Conformance	<p>Evidenced that the Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, (based on the United Nations Guiding Principles on Business and Human Rights) , and the established principles were endorsed in the Universal Declaration of Human Rights and the International Labor Organization (ILO), as well as observing the rights of Indigenous Peoples, among others, based on respect for the dignity of the individual, without distinction of any kind.</p> <p>Evidenced that the Entity, during the Human Rights Due Diligence process, did not cause or contribute to adverse impacts on Human Rights, without any need of redress through legitimate processes in their Area of Influence.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Conformance	<p>Evidenced that the Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, (based on the United Nations Guiding Principles on Business and Human Rights) , and the established principles were endorsed in the Universal Declaration of Human Rights and the International Labor Organization (ILO), as well as observing the rights of Indigenous Peoples, among others, based on respect for the dignity of the individual, without distinction of any kind.</p> <p>Evidenced that the Entity, during the Human Rights Due Diligence process, did not cause or contribute to adverse impacts on Human Rights, without any need of redress through legitimate processes in their Area of Influence.</p> <p>Evidenced that the Entity in new projects or major changes in existing projects did not have significant impacts on Indigenous Peoples culturally</p>

CRITERION	RATING	COMMENT
		<p>associated and living on the relevant lands. The Entity establishes that it avoids involuntary Resettlements and adverse and/or significant impacts on Human Rights and Indigenous Peoples. The Entity declares that it makes use of its Land and Property Policy, guided by the International Finance Corporation (IFC) Performance Standard for land acquisition - FPIC (Free, Prior, Informed, Consent).</p> <p>For more information access the Conflict Minerals Report at the link: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework</p>
9.5 Cultural and sacred heritage	Conformance	<p>Evidenced that the Entity has defined a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights, (based on the United Nations Guiding Principles on Business and Human Rights) , and the established principles were endorsed in the Universal Declaration of Human Rights and the International Labor Organization (ILO), as well as observing the rights of Indigenous Peoples, among others, based on respect for the dignity of the individual, without distinction of any kind.</p> <p>Evidenced that the Entity during the Human Rights Due Diligence process did not identify it has caused or contributed to adverse impacts on Human Rights and that it cooperates to identify cultural or sacred heritage sites and values within the Entity's Area of Influence and take measures to avoid or remedy impacts.</p> <p>The Entity, in consultation with the affected Communities, shall cooperatively identify cultural or sacred heritage sites and values within the Entity's Area of Influence and take appropriate measures to avoid or remedy impacts, as well as to ensure continued rights of access to such places or values. For more information access the Conflict Minerals Report at the link: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework and: https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball_2020_Conflict_Minerals_Report.pdf</p>
9.6a Resettlements (avoid or minimise)	Conformance	Evidenced that the Entity in new projects or major changes in existing projects may not have

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		<p>significant impacts on Indigenous Peoples, poor and vulnerable, including women. The Entity establishes that it avoids involuntary Resettlements and adverse and/or significant impacts on Human Rights and the Indian people. The Entity declares that it makes use of its Land and Property Policy, guided by the International Finance Corporation (IFC) Performance Standard for land acquisition - FPIC (Free, Prior, Informed, Consent).</p> <p>For more information access the Conflict Minerals Report at the link: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework and the Human Rights Policy at the link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights</p>
9.6b Resettlements (where unavoidable)	Conformance	<p>Evidenced that the Entity in new projects or major changes in existing projects may not have significant impacts on Indigenous Peoples, poor and vulnerable, including women. The Entity establishes that it avoids involuntary resettlements and adverse and/or significant impacts on Human Rights and the Indian people. The Entity declares that it makes use of its Land and Property Policy, guided by the International Finance Corporation (IFC) Performance Standard for land acquisition - FPIC (Free, Prior, Informed, Consent).</p> <p>For more information access the Conflict Minerals Report at the link: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework and the Human Rights Policy at the link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights</p>
9.7a Local Communities (rights and interests)	Unable to Rate	<p>Evidenced that the Entity respects the legal and customary rights and interests of the local Communities and interacts with local authorities and communities in order to provide well-being, quality of life, access to education, training and engagement to our employees and the population around our factories, always aiming to positively impact our activities.</p> <p>Evidenced that the Entity seeks to understand the needs of each location and meet them through Social Responsibility initiatives for the benefit of the communities, with analysis being carried out to identify the Stakeholders and Area of Influence</p>

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		<p>(using a matrix of interests and influence), as well as the demands and projects in the locations where it operates that are in line with the Entity's global Social Responsibility Guidelines and with BPSA's Social Responsibility policy.</p> <p>Evidenced that the projects are presented quarterly for evaluation by the Entity's executive committee and, after their validation, they are implemented together with specialized partners and, often, also with the support and indication of our employees. Some examples of social projects carried out by BPSA are: Reading Corners, a library to encourage education and reading for children and young people, Sustainability Tournament, a championship that aims to encourage children and adolescents to seek solutions to improve recycling. network, donation campaigns linked to the global #PelaCausa program, such as the Covid Relief Taskforce that provided food baskets, hygiene kits and medical supplies to the community.</p> <p>For more information access the links: https://www.ball.com/sa/vision/sustainability/our-approach/stakeholder-engagement https://alphalumen.org.br/projects/torneio-brasileiro-de-sustentabilidade/ https://www.ball.com/na/vision/sustainability/community/ball-foundation</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
9.7b Local Communities (impacts)	Unable to Rate	<p>Evidenced that the Entity takes appropriate measures to prevent and address any adverse impacts on the livelihoods of the local community resulting from its activities and interacts with local authorities and communities in order to provide well-being, quality of life, access to education, training and engagement of its employees and population around the factories, always with the objective of positively impacting the community. Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
9.7c Local Communities (livelihoods)	Unable to Rate	<p>Evidenced that the Entity takes appropriate measures to prevent and address any adverse impacts on the livelihoods of the local community</p>

CRITERION	RATING	COMMENT
		<p>resulting from its activities and interacts with local authorities and communities in order to provide well-being, quality of life, access to education, training and engagement of its employees and population around the factories, always with the objective of positively impacting the community. Evidenced that the Entity seeks to understand the needs of each location and meet them through Social Responsibility initiatives for the benefit of the communities, with analysis being carried out to identify the Stakeholders and Area of Influence (using a matrix of interests and influence), as well as the demands and projects in the locations where it operates that are in line with the Entity's global Social Responsibility Guidelines and with BPSA's Social Responsibility policy.</p> <p>It is evident that the projects are presented quarterly for evaluation by the Entity's executive committee and, after their validation, they are implemented together with specialized partners and, often, also with the support and indication of our employees. Some examples of social projects carried out by BPSA are: Reading Corners, a library to encourage education and reading for children and young people, Sustainability Tournament, a championship that aims to encourage children and adolescents to seek solutions to improve recycling. network, donation campaigns linked to the global #PelaCausa program, such as the Covid Relief Taskforce that provided food baskets, hygiene kits and medical supplies to the community.</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>Evidenced that the Entity is committed not to contribute to armed conflicts or Human Rights violations in any area, including Conflict-Affected and High-Risk Areas. Evidenced that the Entity has defined the Conflict Minerals Policy, which restricts business in areas of conflict, violence and human rights violations due to the extraction of precious metals, as well as other policies and the Supplier Guidance Principles to ensure that they are not encouraging this type of practice in the value chain. For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p>

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9.9 Security practice	Conformance	Evidenced that the Entity interacts with its security providers to respect Human Rights in accordance with its policies, local legislation and internationally recognized standards and good practices. For more information access the Human Rights Policy at link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Evidenced that the Entity respects the rights of Workers to freely associate in Labor Unions, in accordance with current legislation, ILO conventions and other collective agreements. For more information access the Human Rights Policy at link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights For more information access the link: https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Evidenced that the Entity respects the rights of Workers to freely associate in Labor Unions, in accordance with current legislation, ILO conventions and other collective agreements. For more information access the Human Rights Policy at link: https://www.ball.com/sa/vision/sustainability/talent-management/human-rights For more information access the Link: https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Entity operates in countries where there are no restrictions on freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to Child Labor and Forced or compulsory Labor. Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labor and it has the same expectations as the companies in its supply chain. Hiring workers under 18 for the product manufacturing process or in any environment considered dangerous is not identified. Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has

CRITERION	RATING	COMMENT
		<p>globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.2b Child Labour (hazardous)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Hiring workers under 18 for the product manufacturing process or in any environment considered dangerous is not identified.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.2c Child Labour (worst forms)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Hiring workers under 18 for the product manufacturing process or in any environment considered dangerous is not identified.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link:</p>

CRITERION	RATING	COMMENT
		<p>www.ball.com/human-trafficking For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor. Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain. Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor. Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain. Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>

CRITERION	RATING	COMMENT
10.3c Forced Labour (migrant workers)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the "UK Act"), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p>

CRITERION	RATING	COMMENT
		<p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the “UK Act”), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Conformance</p>	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the “UK Act”), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
<p>10.3g Forced Labour (freedom to terminate employment)</p>	<p>Conformance</p>	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and laws related to child labor and forced or compulsory labor.</p> <p>Evidenced that the Entity has zero tolerance for the use of any Child or Forced Labour and it has the same expectations as the companies in its supply chain.</p> <p>Evidenced that the Entity, to comply with the UK Modern Slavery Act 2015 (the “UK Act”), has globally submitted an annual Declaration on Slavery and Human Trafficking. For more information access the link: www.ball.com/human-trafficking</p> <p>For more information access Ball's Supplier Guiding Principles at the link: www.ball.com/responsible-sourcing-framework</p>

CRITERION	RATING	COMMENT
		<p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.4 Non-Discrimination	Conformance	<p>Evidenced that the Entity guarantees equal opportunities and is committed to attracting and retaining a talented, collaborative and diverse workforce. Evidenced that the Entity does not tolerate discrimination and harassment in the workplace based on factors such as race, ethnicity, color, creed, religion, sex, age, nationality, marital status, sexual orientation, gender identity or expression, disability, information genetics, employment, veteran status or any other characteristic protected by applicable federal, state or local law.</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>
10.5 Communication and engagement	Conformance	<p>Evidenced that the Entity maintains open and direct communication with its employees and their representatives on working conditions and the resolution of labor problems and compensation, without any threat of reprisal, intimidation or harassment. Evidenced that the Entity has implemented a policy and procedure so that employees can report any potential discrimination, harassment or retaliation to their supervisor, Human Resources Manager, any other member of management or the Compliance Alliance, call the Ball Compliance Hotline or use the Compliance Hotline website.</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct For more information access the link: www.ballcompliancehotline.com</p>
10.6 Disciplinary practices	Conformance	<p>Evidenced that the Entity has a Child and Forced Labor Policy that seeks to strictly comply with all regulations and legislation related to child labor and forced or slave labor and that it does not engage in and does not tolerate the use of corporal punishment, mental coercion or physical, harassment and gender-based violence, including sexual harassment or verbal abuse of workers.</p> <p>For more information access Ball's Business Ethics Code of Conduct link: https://www.ball.com/codeofconduct</p>

CRITERION	RATING	COMMENT
10.7a Remuneration (living wage)	Conformance	<p>Evidenced that the Entity respects the rights of Workers to a minimum wage and ensures that salaries are paid monthly in accordance with relevant legislation, including not only the minimum wage laws, but also the norms provided for in collective labor agreements.</p> <p>Evidenced that the Entity has a local Remuneration Policy, as well as Profit Sharing, Remuneration and Benefits mechanisms that respect workers' rights to a decent wage and ensure that wages paid for a normal working period always follow the Applicable Law and industry standards regarding working hours (including overtime), holidays and paid annual leave.</p>
10.7b Remuneration (method of payment)	Conformance	<p>Evidenced that the Entity respects the rights of Workers to a minimum wage and ensures that salaries are paid monthly in accordance with relevant legislation, including not only the minimum wage laws, but also the norms provided for in collective labor agreements.</p> <p>Evidenced that the Entity has a local Remuneration Policy, as well as Profit Sharing, Remuneration and Benefits mechanisms that respect workers' rights to a decent wage and ensure that wages paid for a normal working period always follow the Applicable Law and industry standards regarding working hours (including overtime), holidays and paid annual leave.</p>
10.8 Working Time	Unable to Rate	<p>Evidenced that the Entity respects the rights of Workers to a minimum wage and ensures that salaries are paid monthly in accordance with relevant legislation, including not only the minimum wage laws, but also the norms provided for in collective labor agreements.</p> <p>Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.</p>

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>Evidenced that the Entity has implemented an Occupational Health and Safety Policy that senior management has endorsed and supports through the provision of resources.</p> <p>For more information access Ball's Global Environmental, Health and Safety Policy at the link: https://www.ball.com/sa/vision/sustainability/operations</p>
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CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Evidenced that the Entity has implemented an Occupational Health and Safety Policy that the senior management has endorsed and supports through the provision of resources and which is applied to all Workers and Visitors present in any area or activities under the control of the Entity. For more information access Ball's Global Environmental, Health and Safety Policy at the link: https://www.ball.com/sa/vision/sustainability/operations
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Evidenced that the Entity has implemented an Occupational Health and Safety Policy that senior management has endorsed and supports through the provision of resources and complies with international standards and ILO Conventions on Occupational Health and Safety, including, where relevant, Conventions 155 and 176 of the ILO. For more information access Ball's Global Environmental, Health and Safety Policy at the link: https://www.ball.com/sa/vision/sustainability/operations
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Evidenced that the Entity has implemented an Integrated Management System Policy in BPSA, including Occupational Health and Safety, which senior management has endorsed and supports through the provision of resources and which determines that Workers have the right to understand the dangers and safe practices of their work and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	Evidenced that the Entity has ISO 45001:2018 Certification in accordance with applicable national and international standards.
11.3 Employee engagement on health and safety	Unable to Rate	Evidenced that the Entity provides Workers with a mechanism, such as a joint health and safety committee, by which they can raise, discuss and participate in the resolution of Occupational Health and Safety issues with management. Evidenced that the Entity has ISO 45001:2018 Certification in accordance with applicable national and international standards. Whilst records were reviewed and assessed as being up to date and in compliance, a physical assessment to determine performance was not possible. This Criterion will be fully assessed during the next on-site audit.

CRITERION	RATING	COMMENT
11.4 OH&S performance	Conformance	Evidenced that the Entity evaluates its Occupational Health and Safety performance using performance indicators, following best market practices. Evidenced that the Entity constantly manages and assesses EHS risks and works to eliminate and/or minimize these risks based on their severity.

Document Control and Version History

Revision	Date	Notes
0	8 November 2021	Initial Certification Audit – Provisional Certification