

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# BALL CORPORATION

CERTIFICATE  
NUMBER

52

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

13 DECEMBER 2019

DATE OF EXPIRY

12 DECEMBER 2022

CERTIFIED SINCE

13 DECEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. Hall', written over a white background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

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

**[www.aluminium-stewardship.org](http://www.aluminium-stewardship.org)**

CERTIFICATION SCOPE

Regional managing activities conducted at the headquarter in Luton, UK. Engineering/quality insurance activities conducted at office in Tongwell, UK. Manufacturing of beverage can bodies at facility Cabanillas del Campo, Spain, at facility La Selva, Spain, at facility Bierne, France, at facility Nogara, Italy, at facility Widnau, Switzerland, at facility Ludesch, Austria, at facility Gelsenkirchen, Germany, at facility, Ejpvovice, Czech Republic, at facility Milton Keynes, UK, at facility, Wakefield, UK, at facility Fredericia, Denmark, at facility Fosie, Sweden, at facility Belgrade, Serbia, at facility Mantsala, Finland, at facility Vsevolozhsk, Russia, at facility Argayash, Russia, at facility Manisa, Turkey, and at facility Cairo, Egypt. Manufacturing of beverage can ends at facility Mont, France, at facility Waterford, Ireland and at facility Lublin, Poland. Manufacturing of beverage can bodies and ends at facility Naro Fominsk, Russia and at facility Dammam, Saudi Arabia.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging Europe
CERTIFICATION SCOPE	Regional managing activities conducted at the headquarter in Luton, UK. Engineering/quality insurance activities conducted at office in Tongwell, UK. Manufacturing of beverage can bodies at facility Cabanillas del Campo, Spain, at facility La Selva, Spain, at facility Bierne, France, at facility Nogara, Italy, at facility Widnau, Switzerland, at facility Ludesch, Austria, at facility Gelsenkirchen, Germany, at facility, Ejpovice, Czech Republic, at facility Milton Keynes, UK, at facility, Wakefield, UK, at facility Fredericia, Denmark, at facility Fosie, Sweden, at facility Belgrade, Serbia, at facility Mantsala, Finland, at facility Vsevolozhsk, Russia, at facility Argayash, Russia, at facility Manisa, Turkey, and at facility Cairo, Egypt. Manufacturing of beverage can ends at facility Mont, France, at facility Waterford, Ireland and at facility Lublin, Poland. Manufacturing of beverage can bodies and ends at facility Naro Fominsk, Russia and at facility Dammam, Saudi Arabia.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Material Conversion</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	18 August – 04 October 2019
AUDIT REPORT SUBMISSION	19 November 2019
AUDIT SCOPE	<p>The scope of the Certification Audit covers Ball Beverage Packaging Europe at the Head Office Luton with site visits to Ball Beverage Packaging Belgrade (Serbia), Ball Beverage Packaging Gelsenkirchen (Germany), Ball Beverage Packaging Ludesch (Austria), Ball Beverage Packaging Nogara (Italy) and Ball Beverage Packaging Waterford (Ireland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Material Conversion</li></ul>

---

All applicable criteria in the ASI Performance Standard were included in the audit scope.

---

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

13 December 2019 – 12 December 2022

---

NEXT AUDIT  
TYPE

Re-Certification

---

NEXT AUDIT  
DUE DATE

12 December 2022

---

CERTIFICATE  
NUMBER

52

---

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Governance is a shared responsibility between central functions and the local sites. Compliance audits are conducted from headquarters, evaluations take place e.g. based on ISO 14.001.
1.2 Anti-Corruption	Conformance	BALL has a well-established system to fight corruption, bribery etc. in all its forms. A global business ethics code of conduct exists, that was rolled out globally. It is translated in several languages and is available on the website <a href="https://www.ball.com/codeofconduct">https://www.ball.com/codeofconduct</a> . Compliance hotlines are communicated in the business code of conduct.
1.3 Code of Conduct	Conformance	A business ethics code of conduct exists, that was rolled out globally. It is translated in several languages and is available on the website <a href="https://www.ball.com/codeofconduct">https://www.ball.com/codeofconduct</a> .
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	BALL has a system of global policies and policies, that are valid on Ball Packaging Europe level. While most of the policies are only available internally, relevance is made to the policies in the Business Code of Conduct (see <a href="https://www.ball.com/codeofconduct">https://www.ball.com/codeofconduct</a> ).
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	BALL has a strong commitment to the implementation of Environmental, Social and Governance Policy on all levels. Management systems are implemented and the necessary resources like workforce, money and working time are provided to effectively implement these standards.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The commitment is communicated externally on the website (e.g. our vision at <a href="https://www.ball.com/na/vision/drive-for-10">https://www.ball.com/na/vision/drive-for-10</a> or at <a href="https://www.ball.com/na/vision/sustainability">https://www.ball.com/na/vision/sustainability</a> ) and internally on the shop-floor level on screens, info-boards and in the intranet.
2.2 Leadership	Conformance	The global VP for Strategic Sourcing has overall responsibility for ASI Certification at Ball BPE. He is supported on BPE level by an ASI team, local responsibilities are defined on plant level.

CRITERION	RATING	COMMENT
2.3a Environmental and Social Management Systems (environmental)	Conformance	Almost all BALL sites are certified against ISO 14.001 for environmental management systems. External audits confirm the effectiveness of the system. Two sites are not yet certified but have environmental management systems in place, checked through internal audits, as this is a corporate requirement and prepare for the initial certification audit in 2020
2.3b Environmental and Social Management Systems (social)	Conformance	BALL has a very strong commitment to ethical behavior and corporate compliance. It published a Business Code of Conduct that has to be followed by all employees. All sites are either audited against OHSAS 18.001/ISO 45.001 or are in the preparation of the audit certification like two new sites, that will be audited in 2020. BALL is member of SEDEX – supplier ethical Data Exchange and has its sites audited against SEDEX/SMETA.
2.4 Responsible Sourcing	Conformance	BALL has global sourcing principles, that all suppliers have to adhere too. All suppliers are evaluated on their overall performance, including social, environmental and risk aspects.
2.5 Impact Assessments	Minor Non-Conformance	<p>BALL conducts impact assessments on several levels. The environmental impact analysis is covered by the ISO 14001 Management System, the social impact is covered by SEDEX/SMETA audits, gender analysis, health and safety assessments.</p> <p>The structured human rights impact analysis is not yet conducted.</p>
2.6 Emergency Response Plan	Conformance	Emergency response plans are required by internal standards for all sites. They are developed with stakeholder groups like employees, external experts or where applicable – in discussion and coordination with local authorities.
2.7 Mergers and Acquisitions	Conformance	A process exists for mergers and acquisitions. As part of the due diligence process, environmental, social and governance issues are reviewed.
2.8 Closure, Decommissioning and Divestment	Conformance	Environmental, social and governance issues are included in the process of closure, decommissioning and divestment of plants. This is both required by local law and internal

CRITERION	RATING	COMMENT
		procedures. Environmental surveys are carried out to identify any environmental issues that have to be handled, employees are supported through severance agreements and transfer agencies and machinery is transported to other plants for further use.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	BALL publishes its sustainability reports every two years. The reports are available on the website at <a href="https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports">https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports</a> . Sustainability data (energy, water, waste, greenhouse gas, safety and VOC's) is available on the website at <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> for the last five years.
3.2 Non-compliance and liabilities	Conformance	BALL communicates about any non-compliances and liabilities in its public available GRI register at the BALL website ( <a href="https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative">https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</a> , GRI Index 205-3 & GRI 206, p. 7)
3.3a Payments to governments (legal and contractual)	Conformance	BALL has a clear system of policies and procedures about anti-corruption and bribery and trains staff on it. It publishes information about payments to governments based on legal requirements (fees, taxes etc.) in its sustainability report and in the GRI content index (see <a href="https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative">https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative</a> , GRI 201-1, p. 4)
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	BALL communicates its main stakeholders on the website at <a href="https://www.ball.com/na/vision/sustainability/our-approach/stakeholder-engagement">https://www.ball.com/na/vision/sustainability/our-approach/stakeholder-engagement</a> . The compliance hotline is communicated in the supplier code of conduct (see <a href="https://www.ball.com/codeofconduct">https://www.ball.com/codeofconduct</a> , p. 5 & 6). All reports made through the hotline are investigated.
PRINCIPLE 4 MATERIAL STEWARDSHIP		

CRITERION	RATING	COMMENT
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	BALL conducts life-cycle assessments with an internal tool and participates in LCAs of the metal packaging branch. The results were published through Metal Packaging Europe (see <a href="https://www.metalpackagingeurope.org/informati-on-hub">https://www.metalpackagingeurope.org/informati-on-hub</a> and <a href="https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal%20Packaging%20Europe_Long%20Executive%20Summary_November%202017_v5-FINAL.pdf">https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal%20Packaging%20Europe_Long%20Executive%20Summary_November%202017_v5-FINAL.pdf</a> ).
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	BALL Packaging Europe participates in the elaboration of LCAs, that are published by Metal Packaging Europe. It provides upon customer request product specific instant LCAs, that take into account the size of the can, its production site and the country of sale.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	BALL Packaging Europe participated in the elaboration of product specific LCAs, that are published through Metal Packaging Europe. BALL communicates on its website the advantages of metal packaging and the improvements of the last years (see <a href="https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/beverage-cans">https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/beverage-cans</a> ). The published summary of metal packaging Europe includes the underlying assumptions used (see LCA summary at <a href="https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal%20Packaging%20Europe_Long%20Executive%20Summary_November%202017_v5-FINAL.pdf">https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal%20Packaging%20Europe_Long%20Executive%20Summary_November%202017_v5-FINAL.pdf</a> ).
4.2 Product design	Conformance	BALL communicates in its sustainability report and on the website the overall targets it wants to achieve (e.g. reduction of the carbon footprint by 25% in 2020, increased recycling rates etc. - see <a href="https://www.ball.com/cut-4-carbon">https://www.ball.com/cut-4-carbon</a> ). These targets can be achieved - among others - through the continuous improvement of the design of the can.
4.3a Aluminium Process Scrap (targets)	Conformance	BALL has clear instructions for the minimization of process scrap. Spoilage and efficiency are KPIs, that are monitored and reported on plant and BPE level. All process scrap is collected at the sites and sent for recycling

CRITERION	RATING	COMMENT
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All process scrap is collected separately in blank aluminium and lacquered aluminium, compressed and sent for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Recycling is an important contribution to reduce the environmental impact of aluminium. While legal requirements define the framework for recycling, BALL sets and supports many activities to improve the recycling rate from currently 74% in Europe to 100% by 2030. This includes awareness raising among consumers, cooperation with Metal Packaging Europe and European Aluminium and the cooperation with local authorities in the countries of operation to elaborate road maps for national recycling strategies.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	BALL works together with MPE and European Aluminium on a roadmap to increase recycling rates in Europe from currently 74% to 100%. Many activities are set on local level to increase recycling rates (e.g. awareness raising, inclusion of informal sector etc.)
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	BALL reports its global energy use and GHG emissions by source (scope 1, scope 2, scope 3) for each of its global business units. For BPE, the energy data is already available on the website, while for greenhouse gas emission, direct and indirect emissions are published but they cannot yet be broken down on BPE level (see <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> and <a href="https://www.ball.com/ghg-emissions">https://www.ball.com/ghg-emissions</a> )
5.2 GHG emissions reductions	Conformance	BALL communicates its reduction targets in the sustainability report and on the website ( <a href="https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/beverage-cans/cut-4-carbon">https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/beverage-cans/cut-4-carbon</a> and <a href="https://www.ball.com/ghg-emissions">https://www.ball.com/ghg-emissions</a> ). It commits to reduce the GHG emissions per can by 25 % by 2030.
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.



CRITERION	RATING	COMMENT
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	Data on the volatile organic compounds (VOCs), the largest air emission sources, is collected and reported on local level and compiled on BPE level. All plants have filters and thermoxidizers, all plant have to demonstrate compliance through accurate monitoring and reporting – this data is part of the daily monitoring. VOCs could be reduced significantly in the last years, they are reported in the bi-annual sustainability report and on the website ( <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> )
6.2 Discharges to Water	Conformance	BALL implemented on BPE level water stewardship programs, to reduce the use of water and the discharge to water. All BPE plants are either certified against ISO 14.001 or in the process for the ISO 14.001 certification in 2020. Each plant needs to get local authority consent to discharge to water and air and has to demonstrate compliance through monitoring and reporting. Information can be found at <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> and at <a href="https://www.ball.com/water/">https://www.ball.com/water/</a> .
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Risks are evaluated on local level and included in the emergency response planning.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Possible spills and leakage are defined in the emergency response plan. Major spills and leakages are handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Spills are reported immediately within BPE. Depending on the severity of the spill and in compliance with local legislation, additional steps are taken to inform potential affected parties. Significant spills are communicated in the sustainability report in the GRI Index to the sustainability report (see <a href="https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf">https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf</a> , GRI 306-3, p. 13), no significant spills occurred in the last reporting period.
6.4b Reporting of Spills (regular reporting)	Conformance	Spills are reported immediately within BPE. Depending on the severity of the spill and in compliance with local legislation, additional steps are taken to inform potential affected parties. Significant spills are communicated in the sustainability report in the GRI Index to the

CRITERION	RATING	COMMENT
		sustainability report (see <a href="https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf">https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf</a> , GRI 306-3, p. 13), no significant spills occurred in the last reporting period.
6.5a Waste management and reporting (strategy)	Conformance	BALL is committed to life cycle thinking and aims towards 100% recycling rates of its products. Following the Waste Mitigation Hierarchy, BALL communicates its focus on systematically reducing the amount of waste generated, increasing recycling rates and eliminating waste sent to landfills. BALL reports about its achievements on the website ( <a href="https://www.ball.com/waste">https://www.ball.com/waste</a> ) and in the sustainability report (BALL sustainability report 2018, p. 13).
6.5b Waste management and reporting (disclosure)	Conformance	BALL elaborated a waste policy, where it defines its strategy (according to the waste hierarchy) and the requirements for detailed future reporting. Waste is managed on plant level within the environmental management systems. The amount of waste and the waste disposal method are communicated as part of the global sustainability reporting on the website (see <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> and <a href="https://www.ball.com/na/vision/sustainability/operational-excellence/waste">https://www.ball.com/na/vision/sustainability/operational-excellence/waste</a> ).
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.

CRITERION	RATING	COMMENT
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's Certification Scope.

#### PRINCIPLE 7 WATER STEWARDSHIP

7.1a Water assessment (mapping)	Conformance	Water consumption is monitored as KPI within the environmental management system, the consumption is reported on the website (see <a href="https://www.ball.com/water">https://www.ball.com/water</a> ).
7.1b Water assessment (risk assessment)	Conformance	BALL evaluates its sites since several years against watershed stress areas in its area of influence including any impacted sensitive water bodies for withdrawal and for potential impacts to water quality. Three tools are used to assess this and make better water related decisions: Global Water Tool, Aqueduct and the Water Risk Monetizer. Water is an important factor for BALL (e.g. for the washing of cans). All water related issues are covered by the ISO 14.001 management systems at the plants. The plants set since many years activities to reduce the consumption of fresh water and therefore to reduce the water stress.
7.2a Water management (management plans)	Conformance	BALL defined clear and ambitious targets for the reduction of water consumption. BPE tries to reduce water use absolutely and per 1000 cans, the water rate is improved and BALL tries to develop in one European Plant a piloting system for Zero Liquid Discharge. Water consumption is a key performance indicator, that is reported on the BALL website (see <a href="https://www.ball.com/water/">https://www.ball.com/water/</a> and

CRITERION	RATING	COMMENT
		<a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> ) and in the BALL sustainability report 2018, p. 22 - 27).
7.2b Water management (monitoring)	Conformance	Water consumption is a KPI, that is communicated on the BALL website (see <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> and <a href="https://www.ball.com/water">https://www.ball.com/water</a> /). The monitoring shows the development of water consumption in the last years, with an increase in the first years and a decrease in the last three years. The effectiveness of the plans and actions set is reviewed at least annually.
7.3 Disclosure of water usage and risks	Conformance	BALL communicates its overall targets in improvement of water efficiency, the achievements and the annual development on the BALL website (see <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> ).
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	An overall biodiversity assessment was conducted for all BPE sites with the Integrated Biodiversity Assessment Tool IBAT to determine, whether any BPE plant is located in a Key Biodiversity Area, a Protected Area according to the IUCN management categories, or a Protected Area according to Designation - this is not the case for any plant. Biodiversity assessments are part of the environmental management system and were conducted at several sites with checklists, in cooperation with local authorities or local experts. The scope of the assessment included the land surrounding the Entity's sites in its area of influence including any sensitive areas identified by the IBAT tool. A biodiversity checklist exists and is now the basis for biodiversity assessments at the sites and the elaboration of local biodiversity plans, that aim to improve the biodiversity at the site (e.g. through the planting of trees etc.).
8.2a Biodiversity management (biodiversity action plans)	Conformance	An overall biodiversity assessment was conducted with the Integrated Biodiversity Assessment Tool IBAT and two additional tools. The BPE sites started to conduct local biodiversity assessments with a biodiversity checklist (some under the participation of local experts and local authorities) and to elaborate biodiversity action plans with time bound targets

CRITERION	RATING	COMMENT
		and responsibilities for the implementation of these plans.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	An overall biodiversity assessment was conducted with the Integrated Biodiversity Assessment Tool IBAT and two additional tools. The BPE sites started to conduct local biodiversity assessments with a biodiversity checklist (some under the participation of local experts and local authorities) and to elaborate biodiversity action plans with time bound targets and responsibilities for the implementation of these plans.
8.2c Biodiversity management (reporting)	Conformance	At several sites, activities to improve the local biodiversity were made. Some of them are communicated locally, others at the BALL website (see <a href="https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf">https://www.ball.com/Ball/media/Ball/Global/Downloads/Ball-2018-GRI-Content-Index.pdf</a> , GRI 304, p. 11)
8.3 Alien Species	Conformance	All sites are under pest monitoring programs, aluminium coils are transported on pallets that are either one-way pallets or used for transport between the sites and the pallets for the finished products are plastic pallets, wooden pallets that were controlled or one-way pallets. The risk of introduction of alien species is rated as very low.
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	BALL is committed to the requirements of the Universal Declaration of Human Rights and the International Labour Organization. It has internal documents (e.g. a human rights policy, a Business ethics code of conduct, the supplier guiding principles etc.) and communicates its

CRITERION	RATING	COMMENT
		<p>commitment on the website (see e.g. <a href="https://www.ball.com/na/vision/sustainability/our-approach/priorities">https://www.ball.com/na/vision/sustainability/our-approach/priorities</a> or <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>BALL has a Human Rights Due Diligence Process with human rights policy, business ethics code of conduct, supplier code of conduct, modern slavery statement etc. BALL seeks to avoid direct and indirect involvement in human rights abuses. It identifies, where adverse human rights impact from human trafficking and Conflict Minerals may occur and asks its suppliers to comply with the supplier code of conduct and to sign the code. All sites have SEDEX/SMETA audits conducted every 3 years. All suppliers are required to comply with the BALL supplier code of conduct, main suppliers have to be audited against SEDEX/SMETA. An internal whistleblower hotline exists, where actual or potential human rights violations can be raised. Balls internal audit teams check the compliance with the human rights policy and all applicable regulations. If any human rights violations would be identified, action plans to mitigate these negative impacts in the future and best practice sharing across sites would be initiated.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>BALL is committed to the implementation and fulfillment of human rights and has policies, procedures etc. to handle situations, that might require remediation. Suppliers are expected to demonstrate compliance with the Supplier Guiding Principles. If a suppliers is not in compliance, this may lead to corrective action including the reconsideration of the commercial relationship (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> ).Remediation in the case of human rights violations is part of Ball's human rights policy and related policies. Ball states in its Human Rights Policy (see <a href="https://www.ball.com/Ball/media/Ball/Global/Dowloads/Ball_Human_Rights_Policy_web.pdf">https://www.ball.com/Ball/media/Ball/Global/Dowloads/Ball_Human_Rights_Policy_web.pdf</a> ), that it acts in such a way, that none of its operations knowingly contributes to human</p>

CRITERION	RATING	COMMENT
		rights violations by others. Other policies like the Workplace Policy, address remediation, too.
9.2 Women's Rights	Conformance	BALL commits itself in internal and external documents to the prohibition of discrimination and harassment. It supports women in their professional development and held in May 2019 the BALL European Women Leadership conference and started with the establishment of a regional women leader network.
9.3 Indigenous Peoples	Not Applicable	Not applicable, as production sites of BALL Packaging Europe are not located on or near lands, territories or resources of indigenous people.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	Not applicable, as production sites of BALL Packaging Europe are not located on or near lands, territories or resources of indigenous people.
9.5 Cultural and sacred heritage	Not Applicable	Not applicable, as production sites of BALL Packaging Europe are not located on or near lands, territories or resources of indigenous people.
9.6a Resettlements (avoid or minimise)	Not Applicable	Not applicable, as since joining ASI, BALL has not conducted or considered any resettlements/activities resulting in physical dislocations.
9.6b Resettlements (where unavoidable)	Not Applicable	Not applicable, as since joining ASI, BALL has not conducted or considered any resettlements/activities resulting in physical dislocations.
9.7a Local Communities (rights and interests)	Conformance	BALL seeks to develop an understanding of the cultures, customs and values that prevail in the local communities by developing an inclusive and open dialogue with the people affected by the operations. In the case of extension or building a new plant, both are heavily regulated in the BPE sphere of influence and impact assessments are carried out as part of the planning process. BALL started developing a corporate Land Rights policy based on FPIC principles, to ensure that the rights of local communities are respected (further information at <a href="https://www.ball.com/eu/vision/sustainability/community">https://www.ball.com/eu/vision/sustainability/community</a> and

CRITERION	RATING	COMMENT
		<a href="https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement">https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement</a> ).
9.7b Local Communities (impacts)	Conformance	BALL identified communities as an important stakeholder group and maps their interests on its website (see <a href="https://www.ball.com/eu/vision/sustainability/community">https://www.ball.com/eu/vision/sustainability/community</a> and <a href="https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement">https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement</a> ). The BPE sites are in close relationship with local communities and supports organizations, programs and civic initiatives that advance sustainable livelihoods.
9.7c Local Communities (livelihoods)	Conformance	BALL identified communities as an important stakeholder group and maps their interests on its website. Funding of local projects and environmental protection are main interests, identified for this stakeholder group. BALL invests through the BALL Foundation, corporate giving, employee giving and volunteerism into the future of the communities (see <a href="https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement">https://www.ball.com/eu/vision/sustainability/our-approach/stakeholder-engagement</a> and <a href="https://www.ball.com/na/vision/sustainability/community">https://www.ball.com/na/vision/sustainability/community</a> ).
9.8 Conflict-Affected and High-Risk Areas	Conformance	BALL commits itself not to source material from conflicted areas and requests from its suppliers, to comply with BALL's supplier guiding principles and to sign certifications regarding conflict minerals (see also <a href="https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework">https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework</a> )
9.9 Security practice	Conformance	BALL commits itself in its Human Rights Policy, that the provision of security is consistent with the laws of the relevant country and relevant international standards and guidelines. Strict regulations exist and depending on local regulations and necessities, plant security is either outsourced to specialized agencies (with the relevant permits) or conducted with own staff.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	BALL respects the freedom of association and the employees' right to collective bargaining. This is communicated in the Human Rights



CRITERION	RATING	COMMENT
		<p>Policy, on the website and in the supplier guiding principles. All BPE production sites are audited against SEDEX/SMETA to confirm compliance with these requirements (for additional information see <a href="https://www.ball.com/na/vision/sustainability/talent-management/human-rights">https://www.ball.com/na/vision/sustainability/talent-management/human-rights</a> ).</p>
<p>10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)</p>	<p>Conformance</p>	<p>BALL respects the freedom of association and the employees' right to collective bargaining. This is communicated in the Human Rights Policy, on the website and in the supplier guiding principles. All BPE sites are audited against SEDEX/SMETA to confirm compliance with these requirements (additional information see <a href="https://www.ball.com/na/vision/sustainability/talent-management/human-rights">https://www.ball.com/na/vision/sustainability/talent-management/human-rights</a> ).</p>
<p>10.1c Freedom of Association and Right to Collective Bargaining (alternative means)</p>	<p>Not Applicable</p>	<p>Not applicable, as BALL Packaging Europe does not operate in countries where freedom of association or the right to collective bargaining are restricted by law.</p>
<p>10.2a Child Labour (minimum age)</p>	<p>Conformance</p>	<p>BALL has a Child and Forced Labor Policy and a Human Rights Policy. It adheres to all regulations and laws related to child labor laws and forced or compulsory labor and does not employ individuals under the age of 18 in a manufacturing environment, or in any other hazardous working environment. Where national apprenticeship programs exist, young persons under the age of 18 might be employed within these programs, but no person under the age of 16 is employed in any plant. BALL requests from its suppliers not to employ anyone under the legal working age (see also <a href="https://www.ball.com/na/vision/sustainability/talent-management/human-rights">https://www.ball.com/na/vision/sustainability/talent-management/human-rights</a> ).</p>
<p>10.2b Child Labour (hazardous)</p>	<p>Conformance</p>	<p>BALL has a Child and Forced Labor Policy and a Human Rights Policy. It does not employ individuals under the age of 18 in a manufacturing environment or in any other hazardous working environment. Where national apprenticeship programs exist, young persons under the age of 18 might be employed within these programs, but no person under the age of 16 is employed in any plant. BALL requests from its suppliers not to employ anyone under the legal working age (see also</p>

CRITERION	RATING	COMMENT
		<a href="https://www.ball.com/na/vision/sustainability/talent-management/human-rights">https://www.ball.com/na/vision/sustainability/talent-management/human-rights</a> ).
10.2c Child Labour (worst forms)	Conformance	BALL has a zero tolerance policy according child labour and expects from its suppliers the same. Several policies, audits and control instruments exist to provide freedom of child labour (see <a href="https://www.ball.com/na/vision/sustainability/talent-management/human-rights">https://www.ball.com/na/vision/sustainability/talent-management/human-rights</a> )
10.3a Forced Labour (human trafficking)	Conformance	BALL has a zero tolerance policy to forced labour and articulates the same expectations within its supply chain. The human rights policy prohibits child labor, forced or compulsory labor, servitude, slavery and human trafficking and to show its compliance, BPE presents an annual Slavery and Human Trafficking Statement based on the UK Modern Slavery Act (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> ).
10.3b Forced Labour (deposits, fees, advances)	Conformance	BALL is not involved in forced labour, neither direct nor through labour agencies. Neither deposits nor security payments are required. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )
10.3c Forced Labour (migrant workers)	Conformance	BALL is not involved in forced labour, neither direct nor through labour agencies. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )
10.3d Forced Labour (debt bondage)	Conformance	BALL is not involved in forced labour, neither direct nor through labour agencies. Neither deposits nor security payments are required, nor is any form of debt bondage permitted. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )

CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	BALL is not involved in forced labour. It does not allow any unreasonable restriction of the freedom of the workers movement at the workplace. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	BALL is not involved in forced labour. It does not retain any original documents. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )
10.3g Forced Labour (freedom to terminate employment)	Conformance	BALL is not involved in forced labour. The time for announced termination of the working contract is regulated by local law in the countries of operation. BALL publishes a human trafficking and slavery statement (see <a href="https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery">https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</a> )
10.4 Non-Discrimination	Conformance	BALL is committed to attract and retaining a talented, collaborative and diverse workforce. It does not tolerate any form of discrimination and harassment in the workplace and communicates its approach through the code of conduct, on the website etc. BALL provides a global compliance hotline to report any breaches of its code. The production sites are audited against SEDEX/SMETA.
10.5 Communication and engagement	Conformance	Direct communication channels between workers, their representatives and management exist at all BALL plants. BALL holds on European level once a year the Ball Employee Communication Forum (BECF), where representatives from all BALL plants come together and discuss work related issues with management. A compliance hotline exists, where employees can report any issues. This hotline is communicated internally and externally (e.g. through the business code of conduct).
10.6 Disciplinary practices	Conformance	BALL communicates in its business code of conduct, that it does not tolerate any form of harassment. It regulates in policies and procedures, how to deal with any incidents.

CRITERION	RATING	COMMENT
		Disciplinary measures are regulated by law. BALL provides a compliance hotline to report any issues.
10.7a Remuneration (living wage)	Conformance	BALL communicates on its website, that it provides generous, market competitive reward programs. The minimum wages in the plants are above minimum wage levels required by law, the conformance is checked as part of the SMETA audits. In addition to the wages, the plants provide additional financial and non-financial benefits for the employees. BALL requires from its suppliers to compensate their employees in compliance with all applicable laws.
10.7b Remuneration (method of payment)	Conformance	All payments are documented and submitted on time to the employees' bank accounts on time.
10.8 Working Time	Conformance	BALL communicates in its Business Code of Conduct, that it provides among other things reasonable working hours and fair wages in compliance with local laws and expects the same from its suppliers. Working hours are recorded electronically, local HR and worker representatives ensure, that local laws and agreements are adhered to.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	BALL is committed to a safe working environment and sets continuous and pro-active efforts to provide a safe working environment. Its strategy is based on the international Occupational Health and Safety Management System OHSAS 18.001 (resp. ISO 45.001). BALL strives to be a leader among can manufacturers and in the manufacturing industry with extremely low incident rates (0,88 in 2018 compared to 3,6 resp. 3,9 in the industry). Further information can be found on <a href="https://www.ball.com/na/vision/sustainability/operational-excellence/safety">https://www.ball.com/na/vision/sustainability/operational-excellence/safety</a> .
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	BALLs health & safety policy is applied to workers and visitors. Instruments and institutions are implemented as foreseen by local law (H&S committee, workplace risk assessment etc.) or by BALL internal instructions. Many activities are set (e.g. best behavior practice, safety culture etc.) to reduce

CRITERION	RATING	COMMENT
		workplace related risks. For further information see <a href="https://www.ball.com/safety">https://www.ball.com/safety</a>
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	BALL communicates in its health & safety policy, that it commits itself to comply with all applicable regulations and requirements in the countries of operation. BALL's sustainability focus requires, that the company works proactively toward the goal of zero accidents. The management system is aligned with the OHSAS 18.001.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	BALL commits itself toward the goal of zero accidents. It conducts health & safety audits, trains workers on safety behavior and works on a safety culture in the plants (e.g. through collection of near misses, identification of unsafe conditions etc.).
11.2 OH&S Management System	Conformance	BALL has a health and safety management system, that is aligned with the health and safety standard OHSAS 18001/ISO 45.001. Internal and external audits are conducted to conform the effectiveness of the system.
11.3 Employee engagement on health and safety	Conformance	BALL has a health and safety management system, that is aligned with the health and safety standard OHSAS 18001/ISO 45.001. Employees are involved to provide safe workplaces (internal audits, best behavior safety audits, safety culture, health and safety committees, first aiders etc.).
11.4 OH&S performance	Conformance	BALL is oriented toward zero accidents. It has health and safety KPIs, that are tracked on plant level and BPE level. Many BALL plants work since more than one year without zero recordable accidents, the incident rate is significantly lower than in the whole industry. For further information look at <a href="https://www.ball.com/safety">https://www.ball.com/safety</a> .