
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**BALL BEVERAGE
PACKAGING INDIA
PVT LTD (SRICITY)**

CERTIFICATE
NUMBER

162

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GmbH

DATE OF ISSUE

23 NOVEMBER 2021

DATE OF EXPIRY

22 NOVEMBER 2024

CERTIFIED SINCE

23 NOVEMBER 2021

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'J. H.', with a long horizontal line extending to the right.

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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

Manufacture and supply of Aluminium Beverage
Can Bodies and procurement and supply of
Beverage Can Ends at Sricity facility (India).

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging India Pvt Ltd (Sricity)
CERTIFICATION SCOPE	Manufacture and supply of Aluminium Beverage Can Bodies and procurement and supply of Beverage Can Ends at Sricity facility (India).
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	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 18 May – 17 June 2021
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 21 September 2021
AUDIT SCOPE	<p>The audit scope includes the manufacture and supply of Aluminium Beverage Can Bodies and procurement and supply of Beverage Can Ends at Sri City facility (India).</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">• Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (May 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a combined 'desktop' and on-site exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation and an on-site audit (15 – 17 June 2021).</p>
AUDIT OUTCOME	<ul style="list-style-type: none">• 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

23 November 2021 – 22 November 2024

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

22 November 2022

CERTIFICATE
NUMBER

162

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has identified applicable local legal requirements and communicates these to process owners such as the Human Resources (HR) and Environmental, Health and Safety Departments. Legal compliance training is mandatory for all leaders. The international laws and statutes have been identified to ensure ongoing compliance and reflection in internal policies.
1.2 Anti-Corruption	Conformance	Anti-Corruption related requirements have been defined in the Business Ethics Code of Conduct.
1.3 Code of Conduct	Conformance	The Entity has developed its Business Ethics Code of Conduct, approved by Ball Corporation's President in 2020.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Environmental, Social, and Governance Policies are defined in the Integrated Management System Manual.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	Management personnel have been designated at plant level and at regional level to provide the required resources and undertake regular review of the Policies.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are communicated both internally to employees and externally at the request of interested parties. Abstracts of the Policies are also available on Ball Corporation's website: https://www.ball.com/as/vision/sustainability/our-approach/sustainability-governance
2.2 Leadership	Conformance	The Entity had formed an ASI Committee which has the overall responsibility for the effective implementation of the ASI Performance Standard requirements.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented a certified ISO 14001:2015 Management System. The Entity has implemented a basic Social Management System and underwent a social audit in 2020.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a basic Social Management System and underwent a social audit in 2020.
2.4 Responsible Sourcing	Conformance	The Entity has developed a "Supplier

CRITERION	RATING	COMMENT
		Guiding Principle" wherein responsible sourcing practices are covered.
2.5 Impact Assessments	Conformance	The Entity has an internal process to conduct Impact Assessments for any major activity covering potential impacts on sustainability parameters such as energy, water and waste.
2.6 Emergency Response Plan	Conformance	The Entity has developed Emergency Response Plans with details including the emergency organization structure during operations and step-by-step actions for all possible emergency situations (e.g. LPG leakage) are detailed.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed a formal, internal process for Due Diligence including mergers and acquisitions. There has been no merger or acquisition during the past three years.
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has developed a formal, internal process to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There has been no closure, decommissioning or divestment during the past three years.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity discloses its sustainability performance via Ball Corporation's global Sustainability Report, which is in accordance with the Global Reporting Initiative (GRI) protocol: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
3.2 Non-compliance and liabilities	Conformance	The Entity discloses information about significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law in Ball Corporation's global Sustainability Report. There have been no non-compliance or liabilities reported in the Sustainability Report: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes payments to governments only for applicable taxes e.g. Goods and Services Tax (GST) in India. This is evidenced by review of the financial audit report.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented a documented policy and procedure for employees to report discrimination, harassment, or retaliation. There is a dedicated hotline managed by a third party. Stakeholders can make contact via the website: https://www.ball.com/as/about-ball/contact-us/general-inquiry-form
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Ball Corporation uses the "Instant LCA tool" across its global subsidiaries, including the Entity, to undertake Life Cycle Assessments.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Life Cycle Assessment was carried out following a cradle-to-gate approach. The Instant LCA software (version 2020), was used for each product size: https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/life-cycle
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Life Cycle Assessment related information has been published in the global Sustainability Report, page 20: https://www.ball.com/getmedia/b25d3346-b8ca-4e3f-9cce-562101dd8cd7/Ball-SR20-Web_FINAL.pdf.aspx?ext=.pdf Also on the corporate website: https://www.ball.com/na/vision/sustainability/product-stewardship/packaging/life-cycle
4.2 Product design	Conformance	The Entity's parent company, Ball Corporation, takes a product stewardship approach through product design. Based on the life cycle analyses, the focus is on reducing the weight of cans to reduce the carbon footprint, and on redesigning coatings to reduce substances of concern. There is a three year plan focusing on STAR can specifications i.e. cans that are more environmentally friendly and with higher resource efficiency.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has area and process specific plant spoilage targets to reduce Aluminium Process Scrap. The printed and unprinted plant scrap is separated. 100% of the scrap generated within the plant is sent to a metal supplier for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Aluminium Process Scrap is collected as bright can and deco (printed), compressed (bailing process) and returned to the metal manufacturer for recycling. There is separation of collected Process Scrap.

CRITERION	RATING	COMMENT
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy and is working with various stakeholders to improve collection and recycling of Used Beverage Cans (UBC). The Process Scrap collected from manufacturing activities is sent to the coil manufacturer for recycling.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Ball Corporation undertakes advocacy work with the government on Used Beverage Cans (UBC). The Entity engages with an external collection agency to support the collection and recycling of aluminium cans. Process Scrap collected from manufacturing activities is sent back to the coil manufacturer for recycling.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	Ball Corporation has calculated its greenhouse gas emissions (Scope 1, 2 and 3), which are publicly disclosed at a corporate level: https://www.ball.com/data-center The Entity records energy use and calculates its Scope 1, 2 and 3 GHG emissions and reports data to Ball Corporation for publication of global data. Energy data available on the website can be broken down to regions but not down to facility level. GHG emissions, whilst separated into direct and indirect emissions cannot be broken down to facility level.
5.2 GHG emissions reductions	Conformance	Ball Corporation has developed a reduction plan to achieve its target of a 55% reduction in GHG emissions by 2030. This 1.5°C target has been approved by the Science Based Target Initiative.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity undertakes ambient air monitoring on a quarterly basis by an approved external agency. Results were found to be within permissible limits.
6.2 Discharges to Water	Conformance	The Entity has measured the waste water generated and treated. The process waste water is

CRITERION	RATING	COMMENT
		collected and treated via the effluent treatment plant with a 250 kilolitre per day (kL/day) capacity. The treated waste water is collected and used for gardening, consistent with the approval issued by environmental authorities. The quality parameters of treated water are periodically checked by an external agency, results were found to be within permissible limits.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has conducted a risk assessment for Spills and Leakage and has implemented actions to prevent Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented practices to manage any Spills and Leakage. Responsibilities have been defined and monitored.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place to disclose to affected parties the detail of any significant Spills. There has been no Spill reported during the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity discloses information about Spills and Leakage on an annual basis to Government authorities as part of the "Environmental Statement" as well as in the global Sustainability Report. There has been no Spill reported during the past three years.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed a procedure on waste management describing its waste management strategy including waste minimization and the principles of the 3Rs (i.e. Reduce, Reuse and Recycling). The reporting of waste generated and its disposal are undertaken in accordance with local laws.
6.5b Waste management and reporting (disclosure)	Conformance	<p>The reporting of waste generated and associated disposal methods is undertaken on an annual basis in accordance with local laws, as well as covered in the global Sustainability Report (Snapshot), Environmental Data section:</p> <p>https://www.ball.com/getattachment/na/Vision/Sustainability/Reporting-Hub/Sustainability-Reports/200812-1144-Ball-Sustainability-Slides_ENG_Web.pdf.aspx?lang=en-US&ext=.pdf</p> <p>The Entity provides unit level data which is aggregated in the global data.</p> <p>As per statutory requirement, public disclosure of waste data is made via a mandated display board at the entrance to the Entity. In addition, this</p>

CRITERION	RATING	COMMENT
		information is annually reported to Government authorities (Form 4 for waste) which is accessible to any stakeholder or interested party on request.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The water assessment has been carried out through process and flow line diagram and quantities. The Entity receives 100% of its water intake from the Industrial Park Authority. There is no borewell or ground water extraction.

CRITERION	RATING	COMMENT
7.1b Water assessment (risk assessment)	Conformance	The Entity has conducted a water related assessment as part of its environment risk assessment and mitigation plans have been implemented.
7.2a Water management (management plans)	Conformance	The Entity has implemented time bound plans to reduce water consumption which is measured per thousand cans manufactured in an aggregate manner.
7.2b Water management (monitoring)	Conformance	Water metering is implemented to measure intake, discharge and major process consumption, as well as to review progress against water management plans.
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity implements strategic water plans to mitigate water related risks. The disclosures are made through mechanisms including the environment performance display board at the Entity's boundary and the annual "Environmental Statement" to the Government authority. It is also included in the global Sustainability Report (Snapshot):</p> <p>https://www.ball.com/getattachment/na/Vision/Sustainability/Reporting-Hub/Sustainability-Reports/200812-1144-Ball-Sustainability-Slides_ENG_Web.pdf.aspx?lang=en-US&ext=.pdf</p> <p>The Entity provides unit level water usage data which is aggregated in the global data. As per statutory requirements, public disclosure of water usage is made via the mandated display board at the Entity's entrance. In addition, this information is annually reported to Government authorities (Form 5: comprehensive environmental data including water), which is accessible to any stakeholder or interested party on request.</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The biodiversity assessment has been conducted using an externally developed checklist. The area of land retained as open, green space at the Entity is greater than the minimum 30% required.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity Action Plan has been developed based on the outcome of biodiversity risk assessment.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed with stakeholder consultation and in accordance with the Biodiversity Mitigation Hierarchy. There is no material risk from the Entity's operation and no

CRITERION	RATING	COMMENT
		harm to biodiversity in the area based on the biodiversity risk assessment.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity performance is communicated to stakeholders through various means e.g. annual “Environmental Statement” to Government and the global Sustainability Report (Snapshot) available at: https://www.ball.com/getattachment/na/Vision/Sustainability/Reporting-Hub/Sustainability-Reports/200812-1144-Ball-Sustainability-Slides_ENG_Web.pdf.aspx?lang=en-US&ext=.pdf
8.3 Alien Species	Conformance	A risk assessment has been conducted for Alien Species. All the wooden pallets are heat treated and labelled as per the ISPM-15 Standard.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity’s Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has a Human Rights Policy which confirms its commitment towards national and international Human Rights law covering employees, business partners and local communities. The Policy is available at: https://www.ball.com/getmedia/8b7d7778-a659-453c-9f5d-fd17ef831fde/Human-Rights-GP-03-012-003.pdf.aspx
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has conducted a Human Rights Due Diligence assessment and measures have been taken to identify, prevent, evaluate and mitigate actual and potential Human Rights risks.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has conducted a Human Rights Due Diligence assessment and the Human Rights Policy states that where the Entity identifies as having caused or contributed to adverse Human Rights impacts, it shall provide for or cooperate in their remediation through legitimate processes:

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		https://www.ball.com/na/vision/sustainability/talent-management/human-rights
9.2 Women's Rights	Conformance	The rights of Women are defined in the Employee Code of Conduct as well as in the policy on the prevention of sexual harassment of women in the workplace as per Indian legal requirements. Regular committee meetings are conducted. Management is aiming on increasing diversity and the Entity has developed a target of 20% women employees by 2025 in line with Ball Corporation's global target.
9.3 Indigenous Peoples	Not Applicable	This Criterion does not apply as there are no Indigenous Peoples near the Entity.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion does not apply as there are no Indigenous Peoples near the Entity.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion does not apply as there is no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion does not apply as no Resettlements have been considered or taken place since the Entity joined ASI.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion does not apply as no Resettlements have been considered or taken place since the Entity joined ASI.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of local Communities and assessed the impact on local Community in its Human Rights Due Diligence assessment.
9.7b Local Communities (impacts)	Conformance	The Entity has assessed the impact of its business activities on the local Community as part of its Human Rights Impact Assessment. The Entity has taken steps such as creating employment and requiring local services such as canteen and transportation, which positively impacts livelihoods within the local Community.
9.7c Local Communities (livelihoods)	Conformance	The Entity has taken steps such as creating employment and requiring local services such as canteen and transportation, which positively impacts livelihoods within the local Community. Additionally, the Entity has implemented various social activities under its corporate social responsibility (CSR) initiatives, including the

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		concept of a 'Community Ambassador" where employees are encouraged to do voluntary work.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has evaluated its supply chain and identified where adverse Human Rights impacts in Conflict-Affected and High-Risk Areas may occur. The Entity requires its Suppliers sign an additional certification document regarding conflict minerals. Ball Corporation's global Conflict Minerals Report 2020 is available at: https://www.ball.com/getmedia/fd04942e-ca22-4dea-92e6-2ff2809a8302/Ball-2021-Conflict-Minerals-Report.pdf.aspx
9.9 Security practice	Conformance	Ball Corporation's Human Rights Policy stipulates adopting proportionate security arrangements. The Entity ensures that the provision of security is consistent with local laws and relevant international standards and guidelines.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has a policy on Human Rights which also includes the commitment to respect "freedom of association" in line with national and international laws. This was evidenced through worker interviews.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has a policy on Human Rights, which also includes the commitment to respect "rights to collective bargaining" in line with national and international laws. There is no collective bargaining agreement.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Indian Law does not restricts the right to freedom of association and collective bargaining so there is no need for alternative means of association for Workers.
10.2a Child Labour (minimum age)	Conformance	A Child Labour policy has been developed. The minimum hiring age is 18 years. There is no evidence of Child Labour at the Entity.
10.2b Child Labour (hazardous)	Conformance	The Entity has a zero tolerance policy on Child Labour. The Child Labour policy has been developed to ensure the Entity neither uses nor supports the use of Child Labour in hazardous work areas. The Entity continues to be vigilant through global policies and programs complemented with regular audits within the supply chain.

CRITERION	RATING	COMMENT
10.2c Child Labour (worst forms)	Conformance	The Entity has a zero tolerance policy on Child Labour. The Child Labour Policy has been developed to ensure the Entity neither uses nor supports the use of Worst Forms of Child Labour. The Entity continues to be vigilant through global policies and programs complemented with regular audits within the supply chain.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour. The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies. Recruitment is undertaken by the Human Resources Department directly. There was no evidence of Forced Labour during worker interviews and review of personnel and employment records. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and demand any deposits from its employees. This was confirmed during worker interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights
10.3c Forced Labour (migrant workers)	Conformance	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in, nor supports the use of Forced Labour or requires Migrant Workers to provide security payments or deposits. This was confirmed during worker interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights
10.3d Forced Labour (debt bondage)	Conformance	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not practice Debt Bondage through advance payment. This was confirmed during worker interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights
10.3e Forced Labour (freedom of movement)	Conformance	The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not restrict the freedom of movement of Workers inside

CRITERION	RATING	COMMENT
		<p>the workplace. This was confirmed during worker interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights</p>
<p>10.3f Forced Labour (retention of identity papers, permits, certificates)</p>	<p>Conformance</p>	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and does not retained employees original education, training or identity certificates. This was confirmed during worker interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights</p>
<p>10.3g Forced Labour (freedom to terminate employment)</p>	<p>Conformance</p>	<p>The Entity has a zero tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour and allows employees to terminate their contract with a reasonable length of notice as per the mutually agreed employment contract. This was confirmed during workers interviews. Please see: https://www.ball.com/na/vision/sustainability/talent-management/human-rights</p>
<p>10.4 Non-Discrimination</p>	<p>Conformance</p>	<p>The Entity has developed a policy on Discrimination, harassment and retaliation: https://www.ball.com/na/vision/sustainability/talent-management/human-rights There was no evidence of Discrimination during worker interviews and review of personnel and employment records.</p>
<p>10.5 Communication and engagement</p>	<p>Conformance</p>	<p>The Entity has developed various communication channels including display on notice board and various committees (including the Works Committee, Safety Committee, Prevention of Sexual Harassment or POSH Committee, Food Committee, Cultural Committee and Sports Committee).</p>
<p>10.6 Disciplinary practices</p>	<p>Conformance</p>	<p>The Entity has a Standing Order clearly stating the definition of disciplinary action, procedures to follow and documentation required (Signed by the Joint Commissioner of Labour with acceptance of the Works Committee). The global Ball Corporation Policy 'Workplace Threats and Violence' prescribes a procedure on how to manage those who make threats, exhibit threatening behaviour, or engage in violent acts whilst on Ball Corporation property, including</p>

CRITERION	RATING	COMMENT
		unacceptable disciplinary practices by personnel. Please see: https://www.ball.com/getmedia/8b7d7778-a659-453c-9f5d-fd17ef831fde/Human-Rights-GP-03-012-003.pdf.aspx
10.7a Remuneration (living wage)	Conformance	The Entity has calculated a living wage using the Social Accountability International (SAI) methodology which covers the basic needs of Workers and to provide some discretionary income.
10.7b Remuneration (method of payment)	Conformance	The Entity paid wage is equal to or above the legal minimum wage and is paid by bank transfer. The wages are paid on the first working day of the following month, confirmed during worker interviews.
10.8 Working Time	Conformance	The Entity records the Working Time of all its employees. The weekly hours are 48 hours for shift employees and 40 hours for office staff. Overtime is considered in exceptional situations such as public holidays. A three month period was selected to review the working hours.

PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY

11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has a Global Health and Safety Policy: https://www.ball.com/na/vision/sustainability/operational-excellence/safety The Entity addresses the requirements of communication, review of, and provision of resources under its ISO 45001:2018 certification.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has a Global Health and Safety Policy which applies to all Workers and Visitors present in any area or activities under the Entity's control: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has a Global Health and Safety Policy which includes management commitment to comply with applicable national and international law on Workers' health and safety: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has a Global Health and Safety Policy which reaffirms that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work:

CRITERION	RATING	COMMENT
		https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.2 OH&S Management System	Conformance	The Entity is certified to ISO 45001:2018. There is an IMS (Integrated Management System) Manual covering ISO 45001:2018 requirements supported by OH&S procedures.
11.3 Employee engagement on health and safety	Conformance	The Entity has formed a Safety Committee which meets periodically to discuss topics on health and safety. There is also a systematic plan to engage employees on various topics including health and safety.
11.4 OH&S performance	Conformance	The Entity has developed OH&S performance indicators which are monitored quarterly.

Document Control and Version History

Revision	Date	Notes
0	23 November 2021	Initial Certification Audit – Full Certification