

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# BALL BEVERAGE PACKAGING NORTH & CENTRAL AMERICA

CERTIFICATE  
NUMBER

179

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

BUREAU  
VERITAS  
CERTIFICATION

DATE OF ISSUE

9 MARCH 2022

DATE OF EXPIRY

8 MARCH 2025

CERTIFIED SINCE

9 MARCH 2022

AUTHORISED BY

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

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

CERTIFICATION SCOPE

Management activities for centralized operational functions, global support functions, quality assurance and graphics at the regional headquarters in Westminster (CO), United States.

Manufacturing of Beverage Can Bodies at facilities in the United States including Fairfield, (CA); Fort Atkinson (WI); Fort Worth (TX); Glendale (AZ); Goodyear (AZ); Kapolei (HI); Kent (WA); Monticello (IN); Phoenix (AZ); Pittston (PA); Rome (GA); Saratoga Springs (NY); St. Paul (MN); Tampa (FL); Wallkill (NY); and Williamsburg (VA); and Whitby in Canada; and Queretaro in Mexico.

Manufacturing of Beverage Can Ends at: Bowling Green (KY), United States.

Manufacturing of Beverage Can Bodies and Can Ends at: Findlay (OH), United States and Monterrey, Mexico.

Manufacturing of Beverage Can Bodies and Alumi-Tek Bottles at: Conroe (TX), United States.

Manufacturing of Beverage Can Bodies, Can Ends and Alumi-Tek Bottles at: Golden (CO) and BTIC (CO), United States.

# SUMMARY AUDIT REPORT

## PERFORMANCE STANDARD

### OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging North & Central America
CERTIFICATION SCOPE	<p>Management activities for centralized operational functions, global support functions, quality assurance and graphics at the regional headquarters in Westminster (CO), United States.</p> <p>Manufacturing of Beverage Can Bodies at facilities in the United States including Fairfield, (CA); Fort Atkinson (WI); Fort Worth (TX); Glendale (AZ); Goodyear (AZ); Kapolei (HI); Kent (WA); Monticello (IN); Phoenix (AZ); Pittston (PA); Rome (GA); Saratoga Springs (NY); St. Paul (MN); Tampa (FL); Wallkill (NY); and Williamsburg (VA); and Whitby in Canada; and Queretaro in Mexico.</p> <p>Manufacturing of Beverage Can Ends at: Bowling Green (KY), United States.</p> <p>Manufacturing of Beverage Can Bodies and Can Ends at: Findlay (OH), United States and Monterrey, Mexico.</p> <p>Manufacturing of Beverage Can Bodies and Alumi-Tek Bottles at: Conroe (TX), United States.</p> <p>Manufacturing of Beverage Can Bodies, Can Ends and Alumi-Tek Bottles at: Golden (CO) and BTIC (CO), United States.</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Material Conversion (Production and Transformation)</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>• Initial Certification Audit</li></ul>
AUDIT FIRM	Bureau Veritas Certification
AUDIT DATE	<ul style="list-style-type: none"><li>• 14 June – 16 December 2021</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>• 19 January 2022</li></ul>

AUDIT SCOPE	<p>The audit scope covers Ball Beverage Packaging North and Central America at headquarters (Beverage Packaging Office Centre), Colorado (USA); manufacturing of Beverage Can Bodies at Fort Atkinson (USA), Goodyear (USA) and Queretaro (Mexico) facilities; and manufacturing of Beverage Can Bodies and Ends at Monterrey (Mexico) and BTIC (Beverage Technology and Innovation Center) (USA).</p> <p>The ASI multi-site sampling approach was undertaken to include facilities in the United States including Fairfield, Fort Worth, Glendale, Golden, Kapolei, Kent, Monticello, Phoenix, Pittston, Rome, Saratoga Springs, St. Paul, Tampa, Walkill, Williamsburg, Bowling Green, Findlay, Conroe and Golden (USA) and Whitby in Canada.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"> <li>• Material Conversion (Production and Transformation)</li> </ul> <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"> <li>• Certification</li> </ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li><input checked="" type="checkbox"/> 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.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	9 March 2022 – 8 March 2025
NEXT AUDIT TYPE	Surveillance Audit
NEXT AUDIT DUE DATE	8 March 2023
CERTIFICATE NUMBER	179

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	In accordance with the Integrated Management System (IMS) Compliance Obligations Management System Procedure, the Entity has identified five primary areas of compliance related obligations for the company at the Corporate, Region and site levels.
1.2 Anti-Corruption	Conformance	Ball Corporation maintains a Foreign Corrupt Practices/Global Anti-Corruption Policy, applicable to the Entity, that outlines compliance with Anti-Corruption laws and prohibits all forms of Bribery and Corruption.
1.3 Code of Conduct	Conformance	Ball Corporation has developed a Code of Conduct, applicable to the Entity, that is designed to identify common compliance issues, including Corruption and to provide clear guidance and resources to assist employees' decision making.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has an Integrated Management System Policy which outlines the commitment to meet or exceed customer expectations, to protect the environment, to ensure the health and safety of products, employees and contractors, and to operate responsibly in the community.
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Integrated Management System Policy has been signed by Senior Management and all facilities have completed an attestation adopting the Policy.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Integrated Management System Policy has been signed by Senior Management and all facilities have adopted the Policy. The Policy is communicated to internal and external stakeholders and is posted at each Facility and is available on the Ball Corporation website.
2.2 Leadership	Conformance	The Entity's Vice President of Operations is responsible and accountable for ensuring that the ASI Management System achieves its intended outcomes.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity maintains an Integrated Management System that is designed to meet the requirements of ISO 14001, ISO 45001, FSSC 22000, SMETA 4-Pillar and the ASI Standards.

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity maintains an Integrated Management System that is designed to meet the requirements of ISO 14001, ISO 45001, FSSC 22000, SMETA 4-Pillar and the ASI Standards.
2.4 Responsible Sourcing	Conformance	The Entity has established its Supplier Guiding Principles that outline the business conduct standards for all of its suppliers including employment practices, Human Rights, environment, health and safety, antitrust, Bribery and Anti-Corruption.
2.5 Impact Assessments	Conformance	As part of the Due Diligence process for new projects or major changes to existing facilities, the Entity consults the local regulating agencies to determine if new or modifications to existing regulatory permits are required.
2.6 Emergency Response Plan	Minor Non-Conformance	Each facility has established an Emergency Contingency Plan utilising a standardized template to identify the potential for and the means to respond to incidents and emergency situations and to prevent and mitigate environmental and occupational health and safety impacts, injuries or illnesses, and property damage. However, the Emergency Response Plans at Queretaro and Monterrey do not include rescue plans for confined space and working at heights.
2.7 Mergers and Acquisitions	Conformance	As part of the Due Diligence process for mergers and acquisitions, the Entity reviews all environmental and social aspects in the planning process. The Entity has established site selection and Due Diligence requirements that are used during each merger, acquisition, including new builds.
2.8 Closure, Decommissioning and Divestment	Conformance	As part of the Due Diligence process for plant closures and decommissions, the Entity reviews all environmental and social aspects in the planning process. The Entity has established site selection and Due Diligence requirements that are used during closure, decommissioning and divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Ball Corporation publishes a biannual global Sustainability Report in accordance with the Global Reporting Initiative (GRI) standard and which discloses the Entity's sustainability performance: <a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</a>

CRITERION	RATING	COMMENT
3.2 Non-compliance and liabilities	Conformance	The Entity publicly discloses information on significant fines, judgments, penalties and non-monetary sanctions in the Ball Corporation GRI Content Index report.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only makes payments to governments on a legal and/or contractual basis in alignment with the Ball Code of Conduct and the Foreign Corrupt Practices/Global Anti-Corruption Policy.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity logs customer complaints into a data management system. Product quality, delivery or service issues are investigated and resolved in accordance with the Entity's Corporate Quality Standard Operating Procedure and there is a process for escalating significant complaints. Feedback can be entered into the data management system by customers. Complaints or requests for information from local Community members or local government agencies (including issues of noise, traffic and odour) are usually made directly to the facility and then addressed by Management. The Entity has a communications protocol to escalate significant issues.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Ball Corporation has conducted peer-reviewed comparative Life Cycle Assessments (LCA) for its major products where Aluminium is used. The LCA focuses on environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Ball Corporation has conducted peer-reviewed comparative Life Cycle Assessments (LCA) for its major products where Aluminium is used. The LCA focuses on environmental life cycle impacts of these products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Ball Corporation communicates its Life Cycle Assessments and results on the website and through the global Sustainability Report: <a href="https://www.ball.com/sustainability/real-circularity/life-cycle-analysis">https://www.ball.com/sustainability/real-circularity/life-cycle-analysis</a>

CRITERION	RATING	COMMENT
		<a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</a>
4.2 Product design	Conformance	Based on the principles of life cycle analysis, the focus in the design of products relates to the reduction of the weight of cans, which heavily affects carbon footprint, and on redesigning coatings to reduce substances of concern.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity is committed to reducing spoilage and recycling Aluminium Process Scrap. Each facility has a spoilage target.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity is committed to reducing spoilage and recycling Aluminium Process Scrap. Each facility has processes to separate different classes of Aluminium.
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.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity proactively engages in federal, state and local policy solutions to increase collection and the effectiveness of recycling systems (i.e. deposit return schemes) and policies. The Entity engages with customers to increase access to collection and educate on the benefits of recycling and engages with recycling facilities directly. Further detail is available on the website: <a href="https://www.ball.com/sustainability/real-circularity">https://www.ball.com/sustainability/real-circularity</a>
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity calculates its greenhouse gas emissions (Scope 1, 2 and 3) and reports these data to Ball Corporation for publication, available at: <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> GHG data are available in the annual submission to the CDP Climate Change program: <a href="http://www.cdp.net">www.cdp.net</a>
5.2 GHG emissions reductions	Conformance	Ball Corporation has established GHG reduction targets at a corporate level as a 55% reduction in GHG emissions by the year 2030, which is further aligned at unit or country level. This 1.5°C target has been approved by the Science Based Target Initiative (SBTi). GHG reduction targets are disclosed in the global Sustainability Report and on the website: <a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</a>

CRITERION	RATING	COMMENT
		<a href="https://www.ball.com/sustainability/goals">https://www.ball.com/sustainability/goals</a>
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 is regulated and each facility has a site-specific permit with emission limits. Each facility tracks and reports Emissions to Air and emission calculations are completed at least monthly.
6.2 Discharges to Water	Conformance	The Entity is regulated for each facility has a site-specific permit with discharge limits. Pre-treatment of industrial wastewater prior to discharge to the local government or privately owned treatment facilities is required.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for the assessment and management of Spills. Each location has a site-specific plan that outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for the assessment and management of Spills. Each location has a site-specific plan that outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for responding to and disclosing Spills.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for responding to and disclosing Spills. The Entity discloses information on major Spills within the Sustainability Report as required: <a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</a>



CRITERION	RATING	COMMENT
6.5a Waste management and reporting (strategy)	Conformance	The Entity has a waste management and reporting strategy with goals specific to the reduction of waste. Waste generation is tracked at each facility and reported monthly. Each facility has an EPA Identification Number (or country specific) and is required to track the amount of Hazardous Waste generated each month.
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has a waste management and reporting strategy and has established Key Performance Indicators (KPI's) to track the quantity of waste generated which is reported as part of the Sustainability Scorecard and published monthly. Ball Corporation reports its total waste by disposal method as part of its global Sustainability Report: <a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</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 (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.

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6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity withdraws water from a variety of sources for use in the manufacturing process. Water withdrawals are measured at least monthly via meter readings and tracking utility bills.
7.1b Water assessment (risk assessment)	Conformance	The Entity utilizes the World Resources Institute (WRI) Aqueduct risk analysis tool to determine water-related risks and determined that 13% of facilities are in medium-high risk locations and the same number in high risk areas.
7.2a Water management (management plans)	Conformance	The Entity's management team analyses and evaluates appropriate data and information arising from monitoring and measurement of water usage and have established clear and ambitious water use reduction goals for 2030, available at: <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a>
7.2b Water management (monitoring)	Conformance	Water withdrawals are regularly measured and monitored. Water consumption is a Key Performance Indicator (KPI) with data available at: <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a> The effectiveness of the water management plans and actions is reviewed at least annually.
7.3 Disclosure of water usage and risks	Conformance	Ball Corporation discloses water usage in the Sustainability Report and on the website: <a href="https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf">https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf</a> <a href="https://www.ball.com/data-center">https://www.ball.com/data-center</a>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	The Entity undertook an internal biodiversity assessment at several facilities using the Integrated Biodiversity Assessment Tool (IBAT). The Entity has developed an internal biodiversity checklist which is completed annually.
8.2a Biodiversity management (biodiversity action plans)	Conformance	The Entity has developed an internal biodiversity checklist which is completed annually. Categories identified as high-risk in the checklist require the facility to develop and implement a Biodiversity Action Plan.

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8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Entity has developed an internal biodiversity checklist which is completed annually. Categories identified as high-risk in the checklist require the facility to develop and implement a Biodiversity Action Plan which includes appropriate time-bound targets which are tracked as part of the monthly EHS Scorecard review.
8.2c Biodiversity management (reporting)	Conformance	The Entity has developed an internal biodiversity checklist which is completed annually. Categories identified as high-risk in the checklist require the facility to develop and implement a Biodiversity Action Plan which includes appropriate time-bound targets which are tracked as part of the monthly EHS Scorecard review. Biodiversity is addressed in various reports provided on the Ball website at: <a href="https://www.ball.com/sustainability/sustainability-reporting/downloads">https://www.ball.com/sustainability/sustainability-reporting/downloads</a>
8.3 Alien Species	Conformance	The Entity has developed a Biodiversity Checklist which is used to evaluate the risk of Alien Species. Identified risks are added to each facility's annual aspects and impacts assessment.
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing operations)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy and a Human Trafficking Statement to support the commitment to treating people with dignity and respect, available at: <a href="https://www.ball.com/sustainability/sustainability-reporting/downloads">https://www.ball.com/sustainability/sustainability-reporting/downloads</a>
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has established a Human Rights Due Diligence process including Human Rights Policy, Business Ethics Code of Conduct, Supplier Code of Conduct and Modern Slavery Statement and seeks to avoid direct and indirect involvement in Human Rights abuses.

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		The Entity undertakes a SMETA 4-Pillar audit every three years, covering the areas of Labour Rights, Freedom of Association, Child Labour, working hours, Migrant Workers and Health and Safety.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity is committed to the implementation and fulfillment of Human Rights and has policies and procedures in place to handle situations that require remediation. Suppliers are expected to demonstrate compliance with the Supplier Guiding Principles and corrective action is pursued as necessary. Remediation in the case of Human Rights violations is included in Ball Corporation's Human Rights Policy and related policies. The Entity has implemented a policy and procedure for employees to report discrimination, harassment or retaliation to an anonymous ethics hotline.
9.2 Women's Rights	Conformance	Women's rights are integrated in Ball Corporation's policies on Human Rights, Business Ethics Code of Conduct, Respect in the Workplace and Prohibition of Discrimination. The Entity has an internal Women's Network (BRG), holds bi-monthly educational events and has a focus on developing women in leadership roles.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as the Entity is not located on or near lands, territories or resources of Indigenous People.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as the Entity is not located on or near lands, territories or resources of Indigenous People.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as the Entity is not located on cultural or sacred heritage sites. The Entity's Due Diligence process for new projects avoids locations where cultural or sacred heritage sites may be impacted.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of local Communities and has developed an inclusive and open dialogue with these Communities.

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9.7b Local Communities (impacts)	Conformance	The Entity engages with local Communities when new or changes to existing permits are required.
9.7c Local Communities (livelihoods)	Conformance	The Entity engages with local Communities when new or changes to existing permits are required. The Entity implements community outreach programs such as community grants, disaster relief support and COVID-19 funding to positively impact livelihoods within the local Community.
9.8 Conflict-Affected and High-Risk Areas	Not Applicable	This Criterion is not applicable as the Entity implements the Ball Supplier Guiding Principles and does not source material from Conflicted-Affected and High-Risk Areas.
9.9 Security practice	Conformance	The Entity's Human Rights Policy stipulates adopting proportionate security arrangements. The Entity ensures that the provision of security is consistent with local laws and relevant international standards and guidelines.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity has developed a Human Rights Policy which addresses a commitment to respect Freedom of Association in line with national and international laws.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity has developed a Human Rights Policy which addresses a commitment to respect the right to Collective Bargaining in line with national and international laws.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	The Entity has developed a Human Rights Policy which addresses a commitment to respect the right to Collective Bargaining in line with national and international laws.
10.2a Child Labour (minimum age)	Conformance	The Entity has a Child Labour Policy and does not employ individuals under the age of 18.
10.2b Child Labour (hazardous)	Conformance	The Entity has a zero tolerance policy on Child Labour. The Child Labour Policy has been developed which neither uses nor supports the use of Child Labour in hazardous work areas.
10.2c Child Labour (worst forms)	Conformance	The Entity has a zero tolerance policy on Child Labour. The Child Labour Policy has been developed which neither uses nor supports the use of Worst Form of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity has a zero-tolerance policy on the use of Forced Labour or for Human Trafficking practices

CRITERION	RATING	COMMENT
		and has the same expectation of businesses in the supply chain.
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity has a zero-tolerance policy on the use of Forced Labour. The Entity neither engages in nor supports the use of Forced Labour nor demands any deposits from its employees.
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 uses Migrant Workers.
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.
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 freedom of movement of Workers inside work areas.
10.3f Forced Labour (retention of identity papers, permits, certificates)	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 retain employees' original education, training or identity certificates.
10.3g Forced Labour (freedom to terminate employment)	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 allow its employees to terminate their contract with reasonable length of notice as per mutually agreed employment contract.
10.4 Non-Discrimination	Conformance	The Entity does not tolerate Discrimination in the workplace and has a Discrimination, Harassment and Retaliation Policy. An ethics compliance hotline is available for anonymous reporting.
10.5 Communication and engagement	Conformance	The Entity supports open communication through the Communication Plan, ethics hotline, and the Prohibition of Discrimination, Harassment, and Retaliation Policy.
10.6 Disciplinary practices	Conformance	The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. The Entity's policies, including Prohibition of Discrimination, Harassment and Retaliation

CRITERION	RATING	COMMENT
		Policy, Workplace Threats and Violence Policy, Employee Conduct and Discipline Policy and the Code of Conduct, are available on to employees on an internal web portal and are included in employee training.
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to a living wage and complies with local, state and federal regulations to ensure that wages paid for a normal working week meet at least legal or industry minimum standards.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments are timely, in legal tender and fully documented.
10.8 Working Time	Minor Non-Conformance	The Entity records the Working Time of all its employees and is committed to compliance with local laws and employment contracts. However, Working Time deficiencies were identified specific to hours worked and involuntary overtime.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Minor Non-Conformance	The Entity has an Integrated Management System Policy which supports the Ball Corporation Global EHS Policy. However, at one facility, guarding was found to be inadequate specific to tab stock infeed equipment.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity has an Integrated Management System Policy which addresses Occupational Health and Safety and which applies to all Workers and Visitors.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity identifies four types of compliance obligations within the EHS Management System including Operational (law and regulation related to industrial operations and facilities), Products (legal and customer requirements related to products), Internal (corporate EHS standards) and, Voluntary (industry standards and guidelines).
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed a Facility Safety Rules procedure 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.
11.2 OH&S Management System	Minor Non-Conformance	The Entity maintains an EHS Management System compliant with the requirements of ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems.

CRITERION	RATING	COMMENT
		However, minor miscellaneous health and safety deficiencies were identified, specific to machine guarding and emergency response.
11.3 Employee engagement on health and safety	Conformance	The Entity has established processes for employees to participate and provide input specific to environmental or safety concerns. Employees communicate with management via Safety Committee meetings, Plant Safety Team participation, suggestion boxes and during regular shift meetings.
11.4 OH&S performance	Minor Non-Conformance	The Entity monitors and measures its EHS performance and publishes a monthly EHS Scorecard and each facility highlights leading and lagging metrics and implements corrective action plans as required. However, OH&S performance is not being measured for the BTIC facility, located at the corporate office.

#### **Document Control and Version History**

Revision	Date	Notes
0	9 March 2022	Initial Certification Audit – Full Certification