
ASI CERTIFICATION
PERFORMANCE
STANDARD



PRESENTED TO

**BALL ASIA PACIFIC
(YANGON) METAL
CONTAINER LIMITED**

CERTIFICATE
NUMBER

190

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

LIBERO
ASSURANCE

DATE OF ISSUE

9 MARCH 2023

DATE OF EXPIRY

8 MARCH 2026

CERTIFIED SINCE

9 MARCH 2022

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, 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*

CERTIFICATION SCOPE

Manufacturing and Supply of Aluminium Beverage
Can Bodies and Procurement and supply of
Beverage Can Ends at Ball Asia Pacific (Yangon)
Metal Container Limited, at Yangon plant,
Myanmar.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Asia Pacific (Yangon) Metal Container Limited
CERTIFICATION SCOPE	Manufacturing and Supply of Aluminium Beverage Can Bodies and Procurement and supply of Beverage Can Ends at Ball Asia Pacific (Yangon) Metal Container Limited, at Yangon plant, Myanmar.
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 (9 – 14 December 2021)Surveillance Audit (6 – 8 March 2023)
AUDIT FIRM	LiberoAssurance
AUDIT DATE	<ul style="list-style-type: none">9 – 14 December 2021 (Initial Certification Audit)6 – 8 March 2023 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">11 February 2022 (Initial Certification Audit)4 May 2023 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit (9 – 14 December 2021)</u></p> <p>The audit scope covers the manufacturing and supply of Aluminium Beverage Can Bodies and procurement and supply of Beverage Can Ends at Ball Asia Pacific (Yangon) Metal Container Limited, at Yangon plant, Myanmar.</p> <p>The supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion (Production and Transformation) <p>All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p>At the time of the Audit (December 2021), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a ‘desktop’ exercise, in accordance with ASI Interim Policy</p>

regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

Surveillance Audit (6 – 8 March 2023)

The audit scope covers the manufacturing and supply of Aluminium Beverage Can Bodies and procurement and supply of Beverage Can Ends at Ball Asia Pacific (Yangon) Metal Container Limited, at Yangon plant, Myanmar.

The supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

Criteria in the ASI Performance Standard relevant to the on-site component necessary to transition to Full Certification following the previous 'desktop' audit were included in the audit scope.

AUDIT
OUTCOME

- Full 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

9 March 2023 – 8 March 2026

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

9 September 2024

CERTIFICATE
NUMBER

190

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Applicable legal requirements have been identified and are periodically reviewed for their compliance status. There has been no change or suspension of labour welfare, safety or social benefits after the recent military coup in the country where the Entity operates.
1.2 Anti-Corruption	Conformance	Anti-Corruption requirements and commitments are defined in the Business Ethics Code of Conduct. The Entity has established a hotline, engaged a third party to maintain neutrality and made available a local toll-free number with Burmese-speaking operators for ease of communication. The details of the hotline are displayed in various areas of the plant. The Entity reviews and uploads its compliance status on a quarterly basis to the regional/global Ball team using an internal reporting tool.
1.3 Code of Conduct	Conformance	Ball Corporation has developed a Business Ethics Code of Conduct which is applicable to the Entity and available at: https://www.ball.com/our-company/code-of-conduct The Entity has a local translation of the Code in Burmese which is distributed to each employee and signed.
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity has developed and implemented Ball's corporate Policies on environment, social and governance. The Environment Policy and Health and Safety Policy have been developed and signed by the Country Manager. The Ball Corporate Human Rights Policy which confirms commitment to national and international Human Rights law is applicable to the Entity and is available at: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity's Plant Manager is responsible for providing the required resources and periodically reviewing the Policies, along with the ASI Governance Team and regional/global colleagues.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Policies are communicated both internally to employees via training and display at various locations at the plant, and available externally on demand by interested parties. The Policy is available at:

CRITERION	RATING	COMMENT
		https://www.ball.com/getattachment/3dd3f008-3441-4a2a-b13e-a51154373058/CP-03-013-003-COMPL-Environmental-Health-Safety.pdf
2.2 Leadership	Conformance	The Entity has designated the Plant Manager as having overall responsibility and authority for the implementation of the ASI Performance Standard.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented an Environmental Management System, which is certified as per ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a basic Social Management System and has undergone a social audit in the past against Coca-Cola's Customer Supplier Guiding Principle (SGP), where the Entity received an overall status of Green (i.e., in compliance).
2.4 Responsible Sourcing	Conformance	<p>The Supplier Guiding Principles provide the basis and conditions for responsible sourcing and have been communicated to suppliers for their commitment, available at:</p> <p>https://www.ball.com/getattachment/9199e3dd-aa92-49a8-ae40-63ea9fe3c6d2/Supplier-Guiding-Principles-and-other-exhibits-April2021.pdf</p> <p>Ball's corporate goal is for all Aluminium metal suppliers to be certified to the ASI Performance Standard and other non-metal suppliers to the Sedex audit standard.</p>
2.5 Impact Assessments	Conformance	<p>Ball Corporation implements a Group-wide Impact Assessment procedure for investment which includes impact on sustainability performance among Ball's 'Big 6' categories (energy, water, waste, VOC, gas and safety) and the recently added diversity and inclusion metrics.</p> <p>At the Entity, various capital and operational expenditure initiatives have been implemented for overall business performance with integral evaluation for sustainability.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has developed and implemented an Emergency Response Plan (ERP), which provides an emergency organisation structure for both office and after-office hours and includes responsibilities defined for team members, the plant layout and for each emergency scenario where detailed step by step activities are mentioned.</p> <p>The Security Office acts as the emergency control centre and is operational 24 hours a day, seven days</p>

CRITERION	RATING	COMMENT
		per week. The validation of the ERP is conducted through periodic drills.
2.7 Mergers and Acquisitions	Conformance	Ball Corporation has developed an internal process for Due-Diligence including mergers and acquisitions. There have been no mergers or acquisitions during the past three years at the Entity.
2.8 Closure, Decommissioning and Divestment	Conformance	Ball Corporation has developed an internal process to review environmental, social and governance issues in the planning process for closure, decommissioning and divestment. There has been no closure, decommissioning and divestment during the past three years at the Entity.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	The Entity discloses its sustainability performance via Ball Corporation's global Sustainability Report, which is in accordance with the Global Reporting Initiative (GRI) protocol: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
3.2 Non-compliance and liabilities	Conformance	The Entity discloses information on non-compliances and liabilities, however, there have been none to report to date.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity makes payments to governments only for applicable taxes, including VAT, import duty and corporate income tax. This is evidenced by a review of the Financial Audit Report.
3.3b Payments to governments (disclosure - bauxite mining)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	The Entity has implemented practices for engagement and communication with external Stakeholders. There has been no complaint, grievance or request for information from any Stakeholder or interested party in the recent past.
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	Ball Corporation has conducted Life Cycle Assessments (LCA) of its major products where Aluminium is used.
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	Ball Corporation uses the 'Instant LCA tool' across its global subsidiaries to carry out LCA following a cradle-to-grave approach.

CRITERION	RATING	COMMENT
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	Ball Corporation communicates its Life Cycle Assessments and results on the website and through the Group-wide Sustainability Report, page 22: https://www.ball.com/sustainability/real-circularity/life-cycle-analysis https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
4.2 Product design	Conformance	The Entity has taken a leadership approach to product stewardship by using product design. Based on the principles of life cycle analysis, the focus in the design of products relates to the reduction of the weight of cans, which heavily affects carbon footprint, and on redesigning coatings to reduce substances of concern.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has area/process spoilage targets with the aim to reduce Process Scrap. The printed and unprinted scrap is separated and 100% of the scrap generated is returned to the metal supplier.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Aluminium Process Scrap is collected as bright can and deco (printed), compressed (bailing process) and returned to the metal manufacturer.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy and is working with various Stakeholders to improve the collection and recycling of Used Beverage Cans.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is part of multi-Stakeholder efforts to improve the collection and recycling of Used Beverage Cans (UBC), led by metal suppliers. The Entity conducted a market study to understand and evaluate the volume of Aluminium cans that enter the market and the number of UBC collected and recycled. The Entity also works with consumers to facilitate educational seminars and webinars to increase awareness of environmental sustainability.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity records energy use and calculates its Greenhouse Gas (GHG) emissions (Scope 1, 2 and 3) and reports these data to Ball Corporation for publication which are available at: https://www.ball.com/data-center
5.2 GHG emissions reductions	Conformance	Ball Corporation has established GHG reduction targets at a corporate level as a 55% reduction in GHG emissions by the year 2030, which is further aligned at the unit or country level. This 1.5°C target has been approved by the Science Based Target Initiative (SBTi). Measures in progress at the Entity include the

CRITERION	RATING	COMMENT
		installation of renewable energy (solar) to meet full electricity demand by 2025.
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity monitors Emissions to Air on an annual basis, which is conducted by an approved external agency. Parameters were found to be within permissible limits.
6.2 Discharges to Water	Conformance	Process wastewater is collected and treated via the effluent treatment plant before treated wastewater is discharged to the Government authority.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has undertaken an assessment of Spills and Leakage as part of the environmental aspects and Impact Assessment process. During the plant visit, no Spill or Leakage was identified. Secondary containment areas are provided as necessary.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has implemented Standard Operating Procedures (SOPs) to manage any Spills and Leakages including external communication. During the plant visit, chemical spillage kits were situated near chemical storage areas.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has procedures in place to disclose to affected parties the details of any significant Spills. There has been no Spill reported during the past three years.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has disclosed information on major Spills to government authorities and within the corporate Sustainability Report as required.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a procedure on waste management describing its waste management strategy. The reporting of waste generated and associated disposal methods is undertaken in accordance with local laws. A dedicated, covered storage area for both Hazardous and Non-Hazardous Waste is present. The waste containers are labelled and stored in a covered area.

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	Annual reporting on the quantity of waste generated by the Entity, and its associated disposal is in accordance with local laws as well as covered in the corporate Sustainability Report, Environmental data section: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf The Entity provides unit level data which is aggregated as global data in the Sustainability Report.
6.6a Bauxite Residue (storage construction)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6e Bauxite Residue (state of the art technologies)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a Dross (recovery)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8b Dross (recycling)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8c Dross (review of alternatives)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	The Entity has undertaken a water assessment to include process/flow line diagrams and quantities. The Entity received 100% water intake from Special Economic Zones Authority including rainwater.
7.1b Water assessment (risk assessment)	Conformance	The Entity has undertaken a water-related risk assessment as part of its environment risk assessment and according to mitigation plans have been implemented.
7.2a Water management (management plans)	Conformance	The Entity has implemented time-bound plans to reduce water consumption which is measured in terms of per thousand cans manufactured in an aggregated manner. The key focus of water management, as outlined in the water reduction plan (to 2030) is on rainwater collection and utilisation.
7.2b Water management (monitoring)	Minor Non-Conformance	The Entity's water intake, discharge and process consumption data are monitored and a periodic review of the progress of water management plans is undertaken. However, there is no record of the calibration of water flow meters.
7.3 Disclosure of water usage and risks	Conformance	The Entity's water intake, discharge and process consumption data are monitored and periodic review of the progress of water management plans is undertaken. Data are included in Sustainability Report: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	A biodiversity assessment was undertaken in 2021 by an external party. There are no Protected Areas, wildlife parks, wildlife sanctuaries, national parks, biodiversity conservation parks, ecologically fragile habitats or wilderness containing well-known endangered species and important bird areas present in the Entity's Area of Influence. The Hlawga National Park is approximately 27 miles northwest of the Entity.
8.2a Biodiversity management (biodiversity action plans)	Conformance	A Biodiversity Action Plan has been developed based on the outcomes of the biodiversity risk assessment, which includes measures to improve biodiversity via annual revegetation activities.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	The Biodiversity Action Plan has been developed with external expert recommendations and following Stakeholder consultation and with consideration of the Biodiversity Mitigation Hierarchy. The biodiversity risk

CRITERION	RATING	COMMENT
		assessment determined there is no Material risk to biodiversity from the Entity's operations.
8.2c Biodiversity management (reporting)	Conformance	Biodiversity performance is communicated to Stakeholders through various means including the corporate Sustainability Report: https://www.ball.com/getattachment/6e281e99-3361-4f4a-a964-ac312986bdf4/Ball-SR20-Web_FINAL.pdf
8.3 Alien Species	Conformance	The Entity has conducted a risk assessment for Alien Species. All the wooden pallets are handed as per applicable work instructions, including heat treatment, and labelling as per the International Standard for Phytosanitary Measure (ISPM 15).
8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.4b Commitment to "No Go" in World Heritage properties (existing mines)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	The Entity has established a Human Rights Policy confirming its commitment to national and international Human Rights law covering employees, business partners and Local Communities, available at: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf
9.1b Human Rights Due Diligence (process)	Conformance	The Entity has implemented a Human Rights Due Diligence process which includes measures taken to identify, prevent, evaluate and mitigate actual and potential Human Rights risks.
9.1c Human Rights Due Diligence (remediation)	Conformance	The Entity has implemented a Human Rights Due Diligence process and defines remediation measures should the Entity identify as having caused or contributed to adverse Human Rights impacts. For further information refer to the Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf

CRITERION	RATING	COMMENT
9.2 Women's Rights	Conformance	Women's rights are defined in the Employees Code of Conduct as well as in the Policy on the prevention of sexual harassment of women in the workplace. Regular committee meetings are conducted. The Entity aims to increase diversity and has developed a target of 30 per cent of women employees by 2025 in line with Ball Corporation's global target.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable as there are no Indigenous Peoples identified within the Entity's Area of Influence.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as there are no sacred or cultural heritage sites and values within the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place since the Entity joined ASI. However, the acquisition of land to establish the industrial park was required and facilitated by the industrial park authority (Myanmar Japan Thilawa Development). The Entity was not involved in the resettlement of affected peoples.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlements have been considered or taken place since the Entity joined ASI. However, the acquisition of land to establish the industrial park was required and facilitated by the industrial park authority (Myanmar Japan Thilawa Development). The Entity was not involved in the resettlement of affected peoples.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the rights and interests of Local Communities and assessed the impacts on Local Communities 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 provides ongoing financial contributions to the corporate social responsibility (CSR) program coordinated by the industrial park authority (Myanmar Japan Thilawa Development) where the Entity is located. The CSR program funds projects that focus on education, social welfare, road infrastructure and school infrastructure and equipment.

CRITERION	RATING	COMMENT
9.7c Local Communities (livelihoods)	Conformance	<p>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 implemented actions including creating employment and provision of associated services such as canteen and transportation, which positively impact livelihoods within the Local Community.</p> <p>In addition to the shared CSR program of the industrial park authority, the Entity has implemented various social activities, including the concept of a 'Community Ambassador' where employees are encouraged to do voluntary work and have facilitated community-led programs on education, orphanage support and environmental sustainability workshops.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>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 to sign an additional certification document regarding conflict minerals. Ball Corporation's global Conflict Minerals Report 2020 is available at:</p> <p>https://www.ball.com/getattachment/82f1e762-7739-44d3-939c-ee8160d20f16/Ball-2021-Conflict-Minerals-Report.pdf</p>
9.9 Security practice	Conformance	<p>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, as observed through interviews/consultation with security guards and review of related documents.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity has developed a Human Rights Policy which addresses a commitment to respect Freedom of Association in line with national and international laws. Worker interviews and review of documents confirmed there is a Workplace Coordination Committee (WCC) in accordance with Myanmar law that comprises elected Workers' representatives and Management Representatives and focuses on employment conditions, health and safety, welfare, productivity and other items as per a pre-defined agenda. There is documentation to demonstrate the process for the election of Workers' representatives.</p>
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	<p>The Entity has developed a Human Rights Policy which addresses a commitment to respect the right to Collective Bargaining in line with national and</p>

CRITERION	RATING	COMMENT
		international laws. The WCC has been established in accordance with Myanmar law and comprises elected Workers' representatives and Management Representatives that focus on employment conditions, health and safety, welfare, productivity and other items as per a pre-defined agenda.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This Criterion is not applicable as Myanmar law does not restrict the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity has a Child Labour Policy. Myanmar law states a minimum hiring age of 16 years and the Entity's minimum hiring age is 18 years. There is no evidence of Child Labour at the Entity.
10.2b Child Labour (hazardous)	Conformance	The Entity has implemented a Child Labour Policy and neither uses nor supports the use of Hazardous Child Labour. The minimum hiring age at the Entity is 18 years. There is no evidence of Child Labour at the Entity as found during the plant visit and Workers' interviews, and the Entity regularly audits its supply chain.
10.2c Child Labour (worst forms)	Conformance	The Entity has implemented a Child Labour Policy and neither uses nor supports the use of the Worst Forms of Child Labour. There is no evidence of Child Labour at the Entity as found during the plant visit, and the Entity regularly audits its supply chain.
10.3a Forced Labour (human trafficking)	Conformance	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, as confirmed during the plant visit, Worker interviews and review of recruitment records. Recruitment is undertaken by the Human Resources Department directly. Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity neither engages in nor supports the use of Forced Labour nor demands any deposits from its employees as confirmed during the plant visit, Worker interviews and employment records. Slavery and Human Trafficking Statement:

CRITERION	RATING	COMMENT
		<p>https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour nor uses Migrant Workers, as confirmed during the plant visit, Worker interviews and employment records.</p> <p>Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour and does not practice Debt Bondage through advance payments as confirmed during the plant visit, Worker interviews and review of employment records.</p> <p>Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour and does not restrict the freedom of movement of Workers inside work areas, as confirmed during the plant visit, Worker interviews and review of employment records.</p> <p>Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>

CRITERION	RATING	COMMENT
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour and does not retain employees' original education, training or identity certificates, as confirmed during the plant visit, Worker interviews and review of employment records.</p> <p>Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>The Entity neither engages in nor supports the use of Forced Labour and allows its employees to terminate their contract with a reasonable length of notice as per the mutually agreed employment contract, as confirmed via Worker interviews and review of contract termination records.</p> <p>Slavery and Human Trafficking Statement: https://www.ball.com/getattachment/c36b87af-29c7-494d-b03e-3c906f333f96/Slavery-and-Human-Trafficking-Statement-July-2020.pdf</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.4 Non-Discrimination	Conformance	<p>The Entity has developed a Discrimination, Harassment and Retaliation Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p> <p>There is no evidence of Discrimination at the Entity. The Entity displays its Policy within plant areas in both English and the local language.</p>
10.5 Communication and engagement	Conformance	<p>The Entity has developed various communication channels including display on notice boards and various committees. The Entity hosts annual celebration days as part of its team-building activities. An anonymous employee survey was conducted by Ball global to identify opportunities for improvement and the Entity has subsequently implemented actions to address items identified</p>
10.6 Disciplinary practices	Conformance	<p>The Entity provides an employee handbook to every employee which contains relevant information including disciplinary rules. The Entity abides by the standard employment contract and annexure</p>

CRITERION	RATING	COMMENT
		<p>provisions as per the Myanmar Ministry of Labour which contains guidelines for disciplinary practices. The Ball global Workplace Threats and Violence Policy defines the process to manage employees who make substantial threats, exhibit substantial threatening behaviour, or engage in violent acts on Ball Corporation property, including unacceptable disciplinary practices by personnel.</p> <p>Human Rights Policy: https://www.ball.com/getattachment/f0c0d139-1f06-451a-91f0-f23f49a3c367/Human-Rights-GP-03-012-003-1.pdf</p>
10.7a Remuneration (living wage)	Conformance	<p>The Entity has calculated a living wage using the Social Accountability International (SAI) methodology. The Entity's remuneration payments are equal to or above the legal minimum wage, which meets the basic needs of Workers and provides some discretionary income.</p>
10.7b Remuneration (method of payment)	Minor Non-Conformance	<p>Wages are paid by the Entity on the first working day of the following month.</p> <p>However, it was identified that the Entity has no uniform and harmonised system to monitor and confirm that service providers (e.g., cleaning service, security service, general service) comply with labour laws and employment conditions such as providing employment contracts, leave and social security entitlements, and payslips.</p>
10.8 Working Time	Conformance	<p>The Entity records the Working Time of all employees through a biometric method. Working hours for shift-based employees are 44 hours per week and 40 hours per week for office-based employees. Overtime is considered in exceptional situations such as public holidays.</p>
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has developed a Business System Policy which addresses health and safety, and Ball Corporation has a Global Health and Safety Policy: https://www.ball.com/na/vision/sustainability/operational-excellence/safety</p> <p>The Entity addresses the requirements of communication, review, and provision of resources under its ISO 45001 certification.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	<p>The Entity has developed a Business System Policy which addresses health and safety and applies to all Workers and Visitors present in any area or for activities under the Entity's control:</p>

CRITERION	RATING	COMMENT
		https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and includes management commitment to comply with applicable national and international laws on Workers' health and safety: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity has developed a Business System Policy which addresses health and safety and reaffirms that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work: https://www.ball.com/na/vision/sustainability/operational-excellence/safety
11.2 OH&S Management System	Conformance	The Entity is certified to ISO 45001:2018. There is an Integrated Management System (IMS) Manual covering ISO 45001 requirements supported by OH&S procedures.
11.3 Employee engagement on health and safety	Conformance	The Entity has a Safety Committee which meets regularly to discuss topics on health and safety, as confirmed through meeting minutes. The Entity has a systematic plan to engage employees on health and safety topics. Employees receive regular safety training.
11.4 OH&S performance	Conformance	The Entity has developed detailed OH&S performance indicators which are monitored quarterly. Additionally, a monthly environment, health and safety score is calculated and tracked.

Document Control and Version History

Revision	Date	Notes
0	9 March 2022	Initial Certification Audit – Provisional Certification
1	12 June 2023	Surveillance Audit – Full Certification