

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

BALL CORPORATION

CERTIFICATE
NUMBER

52

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

TÜV
RHEINLAND
CERT GMBH

DATE OF ISSUE

13 DECEMBER 2022

DATE OF EXPIRY

12 DECEMBER 2025

CERTIFIED SINCE

13 DECEMBER 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a light green background.

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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

Manufacturing of beverage can bodies at facilities in Austria (Ludesch), Czechia (Ejpvovice), Denmark (Fredericia), Egypt (Cairo), Finland (Mantsala), France (Bierne), Germany (Gelsenkirchen), Italy (Nogara), Serbia (Belgrade), Spain (Cabanillas del Campo and La Selva), Sweden (Fosie), Switzerland (Widnau), Turkey (Manisa) and United Kingdom (Milton Keynes and Wakefield).

Manufacturing of beverage can ends at facilities in France (Mont), Ireland (Waterford) and Poland (Lublin).

Manufacturing of beverage can bodies and ends at facilities in India (Taloja and Sricity) and Saudi Arabia (Damman).

Administrative activities in facilities in United Kingdom (Headquarters in Luton) and engineering/quality insurance activities in Tongwell).

SUMMARY AUDIT REPORT

PERFORMANCE

STANDARD

OVERVIEW

MEMBER NAME	Ball Corporation
ENTITY NAME	Ball Beverage Packaging EMEA (Europe, Middle East and Africa)
CERTIFICATION SCOPE	<p>Manufacturing of beverage can bodies at facilities in Austria (Ludesch), Czechia (Ejpvovice), Denmark (Fredericia), Egypt (Cairo), Finland (Mantsala), France (Bierne), Germany (Gelsenkirchen), Italy (Nogara), Serbia (Belgrade), Spain (Cabanillas del Campo and La Selva), Sweden (Fosie), Switzerland (Widnau), Turkey (Manisa) and United Kingdom (Milton Keynes and Wakefield).</p> <p>Manufacturing of beverage can ends at facilities in France (Mont), Ireland (Waterford) and Poland (Lublin).</p> <p>Manufacturing of beverage can bodies and ends at facilities in India (Taloja and Sricity) and Saudi Arabia (Damman).</p> <p>Administrative activities in facilities in United Kingdom (Headquarters in Luton) and engineering/quality insurance activities in Tongwell).</p>
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Material Conversion (Production and Transformation)
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Initial Certification Audit (18 August – 4 October 2019)• Re-Certification Audit and Scope Change (18 – 27 January 2023)
AUDIT FIRM	TÜV Rheinland Cert GmbH
AUDIT DATE	<ul style="list-style-type: none">• 18 August – 04 October 2019 (Initial Certification Audit)• 18 – 27 January 2023 (Re-Certification Audit and Scope Change)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 19 November 2019 (Initial Certification Audit)• 26 May 2023 (Re-Certification Audit and Scope Change)
AUDIT SCOPE	<p><u>Initial Certification Audit (18 August – 4 October 2019):</u></p> <p>The scope of the Certification Audit covers Ball Beverage Packaging EMEA (Europe, Middle East and Africa) at the Head Office Luton with site visits to Ball Beverage Packaging Belgrade (Serbia), Ball Beverage Packaging Gelsenkirchen (Germany), Ball Beverage Packaging Ludesch (Austria), Ball</p>

Beverage Packaging Nogara (Italy) and Ball Beverage Packaging Waterford (Ireland).

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

Re-Certification Audit and Scope Change (18 – 27 January 2023):

The audit scope covers Ball Beverage Packaging EMEA (Europe, Middle East and Africa) at the Head Office Luton with site visits to facilities located at Milton Keynes and Wakefield (United Kingdom K), Lublin (Poland), Manisa (Turkey), Widnau (Switzerland) and the Technical Centre located at Tongwell (United Kingdom).

Supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

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

AUDIT
OUTCOME

- Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

13 December 2022 – 12 December 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

12 December 2025

CERTIFICATE
NUMBER

52

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Minor Non-Conformance	<p>The Entity has implemented systems, processes and procedures to ensure awareness of and compliance with Applicable Law and other binding obligations. All production sites are certified against ISO 14001 (environment) and ISO 45001 (occupational health and safety) standards.</p> <p>Compliance is a shared responsibility between central functions and the local sites.</p> <p>However, the Entity's systems to ensure compliance with Applicable Law were not fully effective as one of the audited plants was unable to demonstrate full compliance with their environmental permit (concerning reporting obligations to the authority) and one plant did not demonstrate a systematic approach to the compliance against some legal requirements.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has established and implemented a system to fight Corruption and Bribery in all its forms. A global Business Ethics Code of Conduct has been issued and communicated within the Entity and made publicly available. It has been translated into several languages and is available on the Entity's website: https://www.ball.com/codeofconduct</p> <p>Compliance hotlines are communicated on notice boards, the website and in the Code of Conduct.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has issued and communicated its Business Ethics Code of Conduct, which was announced at a global level. It has been translated in several languages and is available on the website: https://www.ball.com/codeofconduct</p> <p>Employees have received training on the Code. Suppliers are also requested to sign and adhere to the Code.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity has developed a set of global and regional Policies, addressing governance, environmental and social aspects. Whilst most of the policies are only available internally, policies which are made publicly available include:</p> <p>Human Rights Policy: https://www.ball.com/getmedia/51aba6db-ecd1-48dd-9be1-63cd9a9f850a/Human-Rights-GP-03-012-003.pdf</p>

CRITERION	RATING	COMMENT
		<p>Business Ethics Code of Conduct: https://www.ball.com/codeofconduct</p> <p>EU-U.S. and Swiss-U.S. Privacy Shield Policy: https://www.ball.com/eu-u-s-and-swiss-u-s-privacy-shield-policy</p> <p>Supplier Guiding Principles: https://www.ball.com/our-company/supplier-resources/supplier-sustainability</p> <p>Global Health and Safety Policy: https://www.ball.com/getattachment/da1ec3e3-4a9a-4ce3-b76c-3737cb6dd486/Global-Health-and-Safety-Policy-2017.pdf?lang=en-001</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>The Entity has a commitment to the implementation of its environmental, social and governance Policies. Management Systems are implemented and the necessary resources are provided to effectively implement these Policies. Policies are regularly reviewed.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>The Entity has developed a set of global and regional Policies, addressing governance, environmental and social aspects. Whilst most of the policies are only available internally, policies which are made publicly available include:</p> <p>Human Rights Policy: https://www.ball.com/getmedia/51aba6db-ecd1-48dd-9be1-63cd9a9f850a/Human-Rights-GP-03-012-003.pdf</p> <p>Business Ethics Code of Conduct: https://www.ball.com/codeofconduct</p> <p>EU-U.S. and Swiss-U.S. Privacy Shield Policy: https://www.ball.com/eu-u-s-and-swiss-u-s-privacy-shield-policy</p> <p>Supplier Guiding Principles: https://www.ball.com/our-company/supplier-resources/supplier-sustainability</p> <p>Global Health and Safety Policy: https://www.ball.com/getattachment/da1ec3e3-4a9a-4ce3-b76c-3737cb6dd486/Global-Health-and-Safety-Policy-2017.pdf?lang=en-001</p>
2.2 Leadership	Conformance	<p>The Vice President for Operations has overall responsibility for the Entity's certification to the ASI Performance Standard. The Vice President is supported by a regional ASI team. Local responsibilities are defined on plant level.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>The Entity has demonstrated compliance with this Criterion, as its production sites are certified against ISO 14001 (environmental management system).</p>

CRITERION	RATING	COMMENT
2.3b Environmental and Social Management Systems (social)	Conformance	<p>The Entity has implemented its social Management System. It is member of SEDEX (Supplier Ethical Data Exchange) and the Entity has its sites audited against SMETA 6.1 standard.</p> <p>All its sites are certified against ISO 45001 (occupational health and safety management system).</p>
2.4 Responsible Sourcing	Minor Non-Conformance	<p>The Entity has issued its global Supplier Code of Conduct and Supplier Guiding Principles to which all suppliers must adhere. All suppliers which are managed centrally, are evaluated on their overall performance, including environmental, social, and governance (ESG) risk aspects.</p> <p>However, for locally sourced materials and services in one plant, it was not demonstrated that the same rigour was applied (i.e. these local suppliers are also requested to adhere to the Entity's Supplier Code of Conduct and Supplier Guiding Principles, but the systematic assessment and evaluation with regards to ESG aspects was not documented).</p>
2.5 Impact Assessments	Conformance	<p>The Entity has established a procedure for specifying how to manage large projects. The Entity assesses cultural and Human Rights impacts according to legal requirements.</p> <p>For recent extension projects, Impact Assessments were demonstrated, as appropriate.</p>
2.6 Emergency Response Plan	Conformance	<p>Site specific Emergency Response Plans have been implemented at all sites. They are developed with Stakeholder groups such as employees, external experts or where applicable, in discussion and coordination with local authorities.</p>
2.7 Mergers and Acquisitions	Conformance	<p>A process exists for mergers and acquisitions. As part of the Due Diligence process, environmental, social and governance issues are reviewed. The Entity has not been engaged in mergers or acquisitions since the previous certification audit.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Environmental, social and governance issues are included in the process of closure, decommissioning and divestment of plants. This is both required by local law and internal procedures. Environmental surveys are carried out to identify any environmental issues that have to be handled, employees are supported through severance agreements and transfer agencies and machinery is transported to other plants for further use.</p>

CRITERION	RATING	COMMENT
3.1 Sustainability Reporting	Conformance	The Entity publishes its Sustainability Report every two years. The reports are available at: https://www.ball.com/na/vision/sustainability/reporting-hub/sustainability-reports Annual sustainability data over the last five years (including energy, water, waste, greenhouse gas, safety and VOC's) is available on the website at: https://www.ball.com/data-center
3.2 Non-compliance and liabilities	Conformance	The Entity communicates about any non-compliances and liabilities in its publicly available Global Reporting Initiative (GRI) Content Index, GRI Index 205-3 and GRI 206, page 7: https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative)
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has a clear system of policies and procedures about anti-Corruption and Bribery and trains staff appropriately. It publishes information about payments to governments based on legal requirements (fees, taxes etc.) in its Sustainability Report and in the GRI Content Index, GRI 201-1, page 5: https://www.ball.com/na/vision/sustainability/reporting-hub/global-reporting-initiative
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 communicates to its main Stakeholders on the website at: https://www.ball.com/sustainability/our-approach The compliance hotline is communicated in the Supplier Code of Conduct and all reports made through the hotline are investigated. A dedicated webpage for reporting compliance issues has been implemented: https://app.convercent.com/en-US/LandingPage/ea2d5425-6f27-e611-80c8-000d3ab06827 The grievance mechanism is accessible in various languages at: https://app.convercent.com/en-US/LandingPage/ea2d5425-6f27-e611-80c8-000d3ab06827
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has conducted Life Cycle Assessments (LCAs) with an internal tool and participated in LCAs of the metal packaging branch. The results were published through Metal Packaging Europe:

CRITERION	RATING	COMMENT
		<p>https://www.metalpackagingeurope.org/information-hub and https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal Packaging Europe Long Executive Summary November 2017 v5-FINAL.pdf</p> <p>Additional information on LCAs can be found at: https://www.ball.com/sustainability/real-circularity/life-cycle-assessment and https://www.ball.com/sustainability/product-stewardship/life-cycle</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity participated in the elaboration of LCAs, which were published by Metal Packaging Europe. On customer request, the Entity provides product-specific instant LCAs, that take into account the size of the can, its production site and the country of sale.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity participated in the elaboration of product-specific LCAs, which are published through Metal Packaging Europe. The published summary of Metal Packaging Europe includes the underlying assumptions used (see LCA summary at: https://www.metalpackagingeurope.org/sites/default/files/2017-12/Metal%20Packaging%20Europe Long%20Executive%20Summary November%202017 v5-FINAL.pdf)
4.2 Product design	Conformance	The Entity has a focus on the environmental and health aspects of its Products. Clear objectives in the product development process are defined. Important aspects include the weight reduction of the cans and removal of any materials of concerns from inks and coatings.
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has clear instructions for the minimisation of process scrap. Spoilage and efficiency are key performance indicators that are monitored and reported at both a plant and Entity level. All process scrap is collected at the sites and sent for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	All process scrap is collected separately (blank Aluminium and lacquered Aluminium) and sent for recycling. Only one alloy is used per site.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has established a recycling strategy. While legal requirements define the framework for recycling, the Entity sets and supports many activities to improve the recycling rate in Europe to 100% by 2030. This includes awareness raising among consumers, cooperation with Metal Packaging Europe and European Aluminium and the

CRITERION	RATING	COMMENT
		cooperation with local authorities in the countries of operation to elaborate roadmaps for national recycling strategies.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity co-operates with Metal Packaging Europe and European Aluminium on implementation of a roadmap to increase recycling rates in Europe. Activities are set on local level to increase recycling rates.
PRINCIPLE 5 GREENHOUSE GAS EMISSIONS		
5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity reports its global energy use (by both direct and indirect energy) and Greenhouse Gas (GHG) emissions (Scope 1, 2 and 3) on a global level, available at: https://www.ball.com/sustainability/sustainability-reporting/data-center# and https://www.ball.com/getattachment/68d80900-61c7-4035-a549-13404e8ba45b/Ball-Corporation_2021-CDP-Climate-Change-Response.pdf and https://www.ball.com/getattachment/03cb556b-9ace-4d8d-9b96-94c68079e06b/Ball-2021-Combined-Report.pdf (page 33).
5.2 GHG emissions reductions	Conformance	The Entity communicates its reduction targets on the website and in the Sustainability Report 2021, page 19: https://www.ball.com/sustainability/sustainability-reporting/downloads and https://www.ball.com/ghg-emissions It commits to achieve 100% renewable electricity globally by 2030, with an interim target of 75% by 2025 and 30% energy efficiency improvement (electricity and natural gas) in can manufacturing (2020-2030).
5.3a Aluminium Smelting (management system)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE		
6.1 Emissions to Air	Conformance	The Entity reports on relevant emissions to air (volatile organic compounds (VOCs), nitrogen oxides (NOx), sulfur oxides (SOx) and particulate matter (PM)), annually at a global level:

CRITERION	RATING	COMMENT
		https://www.ball.com/sustainability/sustainability-reporting/data-center
6.2 Discharges to Water	Conformance	<p>Discharged water throughout the Entity is approximately of the same magnitude of the extracted/consumed water used (less evaporation rates during production). Information is publicly disclosed at:</p> <p>https://www.ball.com/sustainability/sustainability-reporting/data-center and https://www.ball.com/water/</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity's sites have assessed major risk areas of operations including Spills and Leakages within the frame of environmental aspects and impact analysis.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Possible Spills and Leakage are defined in the Emergency Response Plan. Major Spills and Leakages are handled and communicated by the emergency response team.
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>Spills are reported immediately within the Entity's sites. Depending on the severity of the Spill and in compliance with local legislation, additional steps are taken to inform potential affected parties.</p> <p>No significant Spills occurred in the previous reporting period.</p>
6.4b Reporting of Spills (regular reporting)	Conformance	<p>Spills are reported immediately within the Entity's sites. Depending on the severity of the spill and in compliance with local legislation, additional steps are taken to inform potential affected parties. Significant Spills are communicated in the Sustainability Report and the GRI Content Index, GRI 306-3, p. 13:</p> <p>https://www.ball.com/sustainability/sustainability-reporting/downloads</p> <p>No significant Spills occurred in the previous reporting period.</p>
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity aims towards a 100% recycling rate of its Products. Following the Waste Mitigation Hierarchy, the Entity communicates its focus on systematically reducing the amount of Waste generated, increasing recycling rates and eliminating waste sent to landfills. The Entity reports its achievements at:</p> <p>https://www.ball.com/waste</p> <p>Also, in the Sustainability Report and GRI Content Index:</p> <p>https://www.ball.com/sustainability/sustainability-reporting/downloads</p>

CRITERION	RATING	COMMENT
6.5b Waste management and reporting (disclosure)	Conformance	The Entity has developed and implemented a Waste Policy, where it defines its strategy. Waste is managed on plant level within the Environmental Management Systems. The amount of waste and the waste disposal method are communicated as part of the global sustainability reporting at: https://www.ball.com/data-center
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.

PRINCIPLE 7 WATER STEWARDSHIP

CRITERION	RATING	COMMENT
7.1a Water assessment (mapping)	Conformance	<p>The Entity's sites demonstrate that its water withdrawal and use by source and type has been identified and mapped. Water consumption is monitored as a key performance indicator within the Environmental Management System, and reported at:</p> <p>https://www.ball.com/water</p>
7.1b Water assessment (risk assessment)	Conformance	<p>The Entity has evaluated its sites against Watershed stress areas in its Area of Influence.</p> <p>Water is an important aspect of the Entity's sites (in particular for the washing of cans). Water-related issues are addressed by the Entity's Environmental Management System at each plant. The Entity continually works to reduce its specific water consumption.</p>
7.2a Water management (management plans)	Conformance	<p>The Entity has demonstrated clear targets for the reduction of water consumption. It works continually to reduce water use absolutely and per 1000 cans. Water consumption is a key performance indicator that is reported at: https://www.ball.com/water/ and https://www.ball.com/data-center and in the Sustainability Report 2021 on page 25 https://www.ball.com/sustainability/sustainability-reporting/downloads</p> <p>The Entity has plans in place to reduce the specific water required for the production of cans.</p>
7.2b Water management (monitoring)	Conformance	<p>Water consumption is a key performance indicator that is communicated on the website at: https://www.ball.com/data-center and https://www.ball.com/water/</p> <p>Monitoring data demonstrates decreasing water consumption over recent years.</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity communicates its report water withdrawal on a global and regional level at:: https://www.ball.com/sustainability/sustainability-reporting/data-center</p> <p>At a global level, water related risks are also disclosed: https://www.ball.com/sustainability/product-stewardship/resource-efficiency</p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>An overall Biodiversity assessment has been undertaken for all of the Entity's sites, using the Integrated Biodiversity Assessment Tool (IBAT) to determine whether any site is located in a key biodiversity area or a Protected Area. The risk</p>

CRITERION	RATING	COMMENT
		assessment confirmed that this is not the case for any plant. Biodiversity assessments are incorporated into the Environmental Management System and were conducted in cooperation with local authorities or local experts. The scope of the assessments included the land surrounding the Entity's sites in its Area of Influence including any sensitive areas identified by the IBAT tool.
8.2a Biodiversity management (biodiversity action plans)	Conformance	Site-specific Biodiversity Action Plans have been developed, implemented and monitored for relevant sites.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	An overall Biodiversity assessment was conducted using IBAT as well as additional assessment tools. The Entity's sites conducted local biodiversity assessments with a biodiversity checklist (some utilising participation of local experts and local authorities) and has established Biodiversity Action Plans with time-bound targets and responsibilities for the implementation of these plans.
8.2c Biodiversity management (reporting)	Conformance	The Entity has reported on Biodiversity aspects in its GRI Content Index report: https://www.ball.com/getattachment/07873f80-1d82-4e2e-82e6-fa7f4d38cf9f/Ball-2022-GRI-Content-Index-Response_June-2022.pdf
8.3 Alien Species	Conformance	All the Entity's sites have implemented pest monitoring programs. The risk of introduction of Alien Species has been rated as very low. However, pallets are either used in a 'one-way' manner, treated or are constructed of plastic.
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

CRITERION	RATING	COMMENT
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity is committed to the requirements of the Universal Declaration of Human Rights and the International Labour Organization. It has internal documents (e.g. a Human Rights Policy, a Business Ethics Code of Conduct, the Supplier Guiding Principles) and communicates its commitment via: https://www.ball.com/getmedia/51aba6db-ecd1-48dd-9be1-63cd9a9f850a/Human-Rights-GP-03-012-003.pdf and https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has implemented a Human Rights Due Diligence process including a Human Rights Policy, Business Ethics Code of Conduct, Supplier Code of Conduct and Modern Slavery Statement. It identifies, where adverse Human Rights impact from Human Trafficking and conflict minerals may occur and asks its suppliers to comply with the Supplier Code of Conduct and to sign the Code. All sites have SEDEX/SMETA audits conducted every three years. All suppliers are required to comply with the Supplier Code of Conduct, and main suppliers have to be audited against SEDEX/SMETA. An internal whistleblower hotline exists, where actual or potential Human Rights violations can be raised. The Entity's internal audit teams check compliance with the Human Rights Policy and all applicable regulations. If any Human Rights violations are identified, action plans to mitigate the negative impacts would be initiated and best practice sharing across sites would occur.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity is committed to the implementation and fulfilment of Human Rights and has policies and procedures in place to handle situations that may require remediation. Suppliers are expected to demonstrate compliance with the Entity's Supplier Guiding Principles. If a supplier is not in compliance, this may lead to corrective action including the reconsideration of the commercial relationship. For further information refer: https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</p> <p>Remediation required resulting from Human Rights violations is discussed in the Entity's Human Rights Policy and related policies:</p>

CRITERION	RATING	COMMENT
		https://www.ball.com/getmedia/51aba6db-ecd1-48dd-9be1-63cd9a9f850a/Human-Rights-GP-03-012-003.pdf
9.2 Women's Rights	Conformance	Women's Rights are integrated in the Entity's Policies on Human Rights, Business Ethics Code of Conduct, respect in the workplace and non-discrimination. The Entity rewards all employees equitably based on their competitive labour market data, performance levels and contributions, whilst ensuring adherence to all Applicable Laws and regulations. The Entity is committed to empowering women and enabling a community of support within the organisation through internal Women's Network (BRG), community outreach and engagement, and continued focus on developing women in leadership roles.
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as production sites of the Entity are not located on or near lands, territories or resources of Indigenous Peoples.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as production sites of the Entity are not located on or near lands, territories or resources of Indigenous Peoples.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as production sites of the Entity are not located on or near lands, territories or resources of Indigenous Peoples.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as since joining ASI, the Entity has not conducted or considered any resettlements/activities resulting in physical dislocations.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as since joining ASI, the Entity has not conducted or considered any resettlements/activities resulting in physical dislocations.
9.7a Local Communities (rights and interests)	Conformance	The Entity seeks to develop an understanding of the cultures, customs and values that prevail in the Local Communities by developing an inclusive and open dialogue with the people affected by the operations. In the case of extension or building a new plant, Impact Assessments are undertaken as part of the planning process. The Entity has started developing a corporate Land Rights Policy based on FPIC principles, to ensure that the rights of Local Communities are respected: https://www.ball.com/eu/vision/sustainability/community and

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		https://www.ball.com/sustainability/our-approach
9.7b Local Communities (impacts)	Conformance	<p>The Entity has identified Communities as a Stakeholder group and mapped their interests: https://www.ball.com/getattachment/d0e1d73f-335e-4ca3-9c5a-e343a41c7e9b/Sustainability-Materiality-Matrix-DOWNLOAD.pdf?lang=en-001</p> <p>The Entity's sites maintain relationships with Local Communities and demonstrated support for organisations, programs and civic initiatives that advance sustainable livelihoods.</p>
9.7c Local Communities (livelihoods)	Conformance	<p>The Entity has identified Communities as a Stakeholder group and mapped their interests: https://www.ball.com/getattachment/d0e1d73f-335e-4ca3-9c5a-e343a41c7e9b/Sustainability-Materiality-Matrix-DOWNLOAD.pdf?lang=en-001</p> <p>The funding of local projects and environmental protection are the main interests identified for this Stakeholder group. The Entity invests in Local Communities via the Ball Foundation, corporate giving, employee giving and volunteerism.</p>
9.8 Conflict-Affected and High-Risk Areas	Conformance	<p>The Entity has implemented a process to not source material from conflict areas and requests from its suppliers to comply with the Entity's Supplier Guiding Principles and to sign certifications regarding conflict minerals: https://www.ball.com/na/vision/sustainability/product-stewardship/supply-chain/responsible-sourcing-framework</p>
9.9 Security practice	Conformance	<p>The Entity ensures that the provision of security is consistent with the laws of the relevant country and relevant international standards and guidelines. Regulations exist and depending on local regulations and necessities, plant security is either outsourced to specialised licensed service providers or is conducted with its own employees.</p>
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	<p>The Entity respects the Freedom of Association and the employees' right to Collective Bargaining. This is communicated via the Human Rights Policy, Section 1b: https://www.ball.com/getmedia/51aba6db-ecd1-48dd-9be1-63cd9a9f850a/Human-Rights-GP-03-012-003.pdf</p> <p>All of the Entity's production sites are audited against SEDEX/SMETA 6.1 to confirm compliance with these requirements.</p>

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the Freedom of Association and the employees' Right to Collective Bargaining. This is communicated in the Human Rights Policy, on the website and in the supplier guiding principles.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Conformance	<p>This Criterion applies to the Entity's operations in India and Saudi Arabia. In most countries in which the Entity operates, Freedom of Association and the Right to Collective Bargaining are recognised by law. However, Saudi Arabia has ratified none of the following international treaties (including ICESCR, ICCPR, and ILO Conventions) and India has not ratified ILO C87 and ILO C98.</p> <p>At the Entity's Dammam site (Saudi Arabia), alternative means to discuss work related issues have been established, and in SriCity and Taloja (India), unions are active on-site and a Collective Bargaining process is in place.</p>
10.2a Child Labour (minimum age)	Conformance	<p>The Entity has a Child and Forced Labor Policy and a Human Rights Policy. It does not employ individuals under the age of 18 in a manufacturing environment or in any other hazardous working environment. Where national apprenticeship programs exist, young persons under the age of 18 might be employed within these programs, but no person under the age of 16 is employed in any plant. The Entity requests from its suppliers not to employ anyone under the legal working age.</p> <p>https://www.ball.com/na/vision/sustainability/talent-management/human-rights</p>
10.2b Child Labour (hazardous)	Conformance	<p>The Entity has a Child and Forced Labor Policy and a Human Rights Policy. It does not employ individuals under the age of 18 in a manufacturing environment or in any other hazardous working environment. Where national apprenticeship programs exist, young persons under the age of 18 might be employed within these programs, but no person under the age of 16 is employed in any plant. The Entity requests from its suppliers not to employ anyone under the legal working age.</p>
10.2c Child Labour (worst forms)	Conformance	<p>The Entity has a Child and Forced Labor Policy and a Human Rights Policy. Document review, interviews and site tours did not indicate any Child Labour at the Entity's audited plants.</p>
10.3a Forced Labour (human trafficking)	Conformance	<p>The Entity has a zero tolerance for the use of Forced Labour and articulates the same expectations within its supply chain. The Human Rights Policy prohibits</p>

CRITERION	RATING	COMMENT
		<p>Child Labour, compulsory or Forced Labour, servitude, Slavery and Human Trafficking and to demonstrate its compliance, the Entity presents an annual Slavery and Human Trafficking Statement based on the UK Modern Slavery Act: https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</p>
10.3b Forced Labour (deposits, fees, advances)	Conformance	<p>The Entity is not involved in Forced Labour, neither directly nor through labour agencies. Neither deposits nor security payments are required. The Entity presents an annual Slavery and Human Trafficking Statement based on the UK Modern Slavery Act: https://www.ball.com/na/additional-site-content/special-pages/california-transparency-act-and-uk-modern-slavery</p>
10.3c Forced Labour (migrant workers)	Conformance	<p>The Entity is not involved in Forced Labour, neither directly nor through labour agencies. Neither deposits nor security payments are required. The Entity presents an annual Slavery and Human Trafficking Statement based on the UK Modern Slavery Act. Interviews confirmed that Workers do not have to lodge deposits or security payments at any time.</p>
10.3d Forced Labour (debt bondage)	Conformance	<p>Interviews and document reviews confirmed that the Entity is not involved in Forced Labour, neither directly nor through labour agencies. Neither deposits nor security payments are required, nor is any form of Debt Bondage permitted.</p>
10.3e Forced Labour (freedom of movement)	Conformance	<p>Document reviews, site tours and interviews confirmed that the Entity does not unreasonably restrict the freedom of movement of Workers in the workplace.</p>
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	<p>Document reviews and interviews confirmed that the Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates.</p>
10.3g Forced Labour (freedom to terminate employment)	Conformance	<p>Document review and interviews confirmed that the Entity's Workers may terminate their employment at any time without penalty, given notice of reasonable length. The time for announced termination is defined in the working contracts, based on local law in the countries of operation.</p>

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10.4 Non-Discrimination	Conformance	The Entity does not tolerate any form of Discrimination and Harassment in the workplace and communicates its approach through the Code of Conduct, during training and on the website. The Entity provides a global compliance hotline to report any breaches of its Code. The Entity's sites are also audited against SMETA 6.1.
10.5 Communication and engagement	Conformance	The Entity has several communication channels in place, including regular anonymous employee surveys, 'townhall' meetings, team meetings, meetings between Workers and union representatives, Health and Safety Committee meetings and an annual Employee Communication Forum.
10.6 Disciplinary practices	Conformance	The Entity communicates in its Business Ethics Code of Conduct, that it does not tolerate any form of harassment. It regulates in policies and procedures, how to deal with any incidents. Disciplinary measures are regulated by law. The Entity provides a compliance hotline to report any issues.
10.7a Remuneration (living wage)	Conformance	Document review and interviews with Workers, Worker representatives and management confirmed that wages at least meet the legal minimum wage, where such exist.
10.7b Remuneration (method of payment)	Conformance	Interviews and document reviews confirmed that all payments are documented and submitted to the employees' bank accounts in a timely manner.
10.8 Working Time	Conformance	The Entity has committed in its Business Ethics Code of Conduct to provide reasonable working hours and fair wages in compliance with local laws and expects the same from its suppliers. The Entity demonstrated compliance with Applicable Law on Working Time, public holidays and paid annual leave. Working Time is part of each employment contract. Clock-in systems are in place and records were available.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity's global Health and Safety Policy is available, is endorsed by senior management and communicated on site level, including at Head Office. It is part of the induction process or every new employee. To implement the Policy, the Entity has established and maintains an Occupational Health and Safety (OH&S) Management System, which has been successfully certified against ISO 45001

CRITERION	RATING	COMMENT
		standard. https://www.ball.com/getattachment/da1ec3e3-4a9a-4ce3-b76c-3737cb6dd486/Global-Health-and-Safety-Policy-2017.pdf?lang=en-001
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	As confirmed during site visits, the Entity's Health and Safety Policy is applied to Workers and Visitors. Workers receive induction training and refresher training. Visitors receive safety information at site entrances and a safety briefing.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	In its global Health & Safety Policy, the Entity commits itself to comply with all applicable regulations and requirements in the countries of operation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	In its Health and Safety Policy, the Entity has confirmed that Workers have the right to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work. This Policy has been communicated internally.
11.2 OH&S Management System	Minor Non-Conformance	The Entity's sites are certified against ISO 45001 (Occupational Health and Safety Management System Standard). Internal and external audits are conducted to conform the effectiveness of the system. However, the system was considered not fully effective, as in some isolated cases, potentially unsafe conditions and working methods were observed (examples include slippery floors in production areas, forklift restraint use and the limited provision of hazardous substance information for Workers).
11.3 Employee engagement on health and safety	Conformance	The Entity has established and maintains an OH&S Management System which provides for Health and Safety Committees in their sites. Interviews and document review confirmed compliance.
11.4 OH&S performance	Conformance	Document review confirmed that occupational health and safety performance indicators (leading and lagging) are monitored on a monthly basis. All sites are certified against ISO 45001. Incident rates are made publicly available on a global basis at: https://www.ball.com/sustainability/social-impact/health-safety-well-being

Document Control and Version History

Revision	Date	Notes
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0	12 December 2019	Initial Certification Audit – Full Certification
1	20 June 2023	Re-Certification Audit and Scope Change – Full Certification Scope Change to include Sricity, India as a transfer of Certificate 162 (certification period validity of 23 November 2021 – 22 November 2024)) and Taloja, India as a transfer of Certificate 171 (certification period validity of 10 January 2022 – 9 January 2025); Scope Change to remove Facilities Argayash, Naro-Fominsk and Vsevolozhsk in Russia; Change of Audit Firm to TÜV Rheinland Cert GmbH A three month extension was granted by ASI to the Entity due to difficulties experienced relating to audit scheduling and auditor availability