

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

CROWN Beverage Cans Danang Limited

CERTIFICATE NUMBER
378

ASI STANDARD
**PERFORMANCE
STANDARD
(V3 2022)**

CERTIFICATION LEVEL
**FULL
CERTIFICATION**

ASI ACCREDITED
AUDITING FIRM
LIBEROASSURANCE

DATE OF ISSUE
25 JUNE 2024

DATE OF EXPIRY
24 JUNE 2027

CERTIFIED SINCE
25 JUNE 2024

AUTHORISED BY

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

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

Regional management
responsibilities at the Asia Pacific
Division office and manufacturing
of two-piece Aluminium beverage
cans at CROWN Beverage Cans
Danang Limited located in Vietnam.

AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Crown Holdings, Inc.
ENTITY NAME	CROWN Beverage Cans Danang Limited
CERTIFICATION SCOPE	Regional management responsibilities at the Asia Pacific Division office and manufacturing of two-piece Aluminium beverage cans at CROWN Beverage Cans Danang Limited located in Vietnam.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">Material Conversion
ASI STANDARD	<ul style="list-style-type: none">Performance Standard V3
AUDIT TYPE	<ul style="list-style-type: none">Initial Certification Audit
AUDIT FIRM	LiberoAssurance
AUDIT DATE	<ul style="list-style-type: none">19 – 23 December 2023
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">27 May 2024
AUDIT SCOPE	<p>The Audit Scope included the regional management responsibilities at the Asia Pacific Division office and the manufacture of two-piece Aluminium cans at the CROWN Beverage Cans Danang Limited located in Vietnam.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none">Material Conversion <p>All relevant Criteria in the ASI Performance Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none">Certification
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><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.<input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.<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.<input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.
CERTIFICATION PERIOD	25 June 2024 – 24 June 2027

NEXT AUDIT TYPE Surveillance Audit

NEXT AUDIT DATE 25 June 2025

CERTIFICATE NUMBER 378



If you have an inquiry or complaint about this Certification, go to the third-party EthicsPoint portal at: <https://aluminium-stewardship.ethicspoint.com/>

EthicsPoint is a comprehensive and confidential reporting tool that enables complaints to be securely raised, managed and responded to. This enables anonymity to be maintained where desired by complainants, or as relevant to whistleblowing situations.

Information is available in five languages – English, French, Chinese, German and Portuguese (Brazil). Translation services provided by EthicsPoint enable complaints and correspondence to be managed in multiple languages.

ENTITY OVERVIEW

Crown Beverage Cans Danang Limited (the 'Entity') is a 100% subsidiary of Crown Asia Pacific Holdings Pte Ltd with its Head Office located at Lot K, Road 6, Lien Chieu Industrial Park, Hoa Hiep Bac Ward, Vietnam. It has a plot area of approximately 36,000 square metres (m²) and a built-up area of 14,300 m². The Entity has two can lines with an annual production output of 1.4 billion cans per year. Production commenced in May 2013 and is a major provider for the beverage industry in Vietnam. It is located within a designated Industrial Park near the Vietnam East Sea, approximately 12 kilometres from Da Nang International Airport and approximately 30 kilometres from the World Heritage site of Hải Vân Pass (Nam Hai Van).

MATURITY RATINGS

A rating of maturity (low, medium or high) determined by the Auditor that provides a general assessment in terms of systems, Residual Risk and performance assigned to a Sustainability Component.

Maturity ratings are not a direct assessment of conformance to the Standard.

	GOVERNANCE	ENVIRONMENT	SOCIAL	COMBINED RATING
SYSTEMS	Medium	Medium	Medium	MEDIUM
RISKS	Medium	Medium	Medium	MEDIUM
PERFORMANCE	Low	Medium	Low	LOW
OVERALL	MEDIUM			

FINDINGS

CRITERION	RATING	COMMENT
1. BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has identified the relevant legal regulations and specific requirements related to Occupational Health and Safety and environmental protection, including issues including wastewater management, environmental protection plan, environmental monitoring and the management of Hazardous Waste.
1.2 Anti-Corruption	Conformance	<p>The Entity has developed an Anti-Corruption Policy: https://www.crowncork.com/investors/policies/code-business-conduct-and-ethics</p> <p>Each employee is trained in anti-Corruption and participates in 'CROWN University', which is a virtual university: https://www.crowncork.com/sites/files/2022-10/Anti-Corruption-Anti-Money-Laundering-Certifications.pdf</p> <p>Anti-Corruption is also incorporated in the employees' Code Of Conduct, where information on gifts, donations, entertainment, and favours is detailed in the Code of Business Conduct & Ethics: https://www.crowncork.com/investors/policies/code-business-conduct-and-ethics</p> <p>The Entity's formal anti-Corruption risk assessment follows a matrix of likelihood and consequences for major functions.</p>
1.3a-e Code of Conduct	Conformance	<p>The Entity's corporate Code of Business Conduct and Ethics has been developed in multiple languages, and is available at</p> <p>English: https://www.crowncork.com/sites/files/2023-01/2023.01.19%20Code%20of%20Business%20Conduct%20%2801.19.2023%20FINAL%29.pdf</p> <p>Vietnamese: https://www.crowncork.com/sites/files/2023-01/Vietnamese.pdf</p>
2. POLICY AND MANAGEMENT		
2.1a-f Environmental, Social, and Governance Policy	Conformance	<p>The Entity has developed corporate ESG Policies, which are available at: https://www.crowncork.com/investors/policies</p> <p>Governance: https://www.crowncork.com/investors/governance/corporate-governance-guidelines</p> <p>Environment Sustainability: https://www.crowncork.com/investors/policies/environmental-sustainability-policy</p> <p>Environment, Health and Safety (EHS): https://www.crowncork.com/sites/files/2022-03/EHSPolicy_2021_English_Signed.pdf</p> <p>Human Rights: https://www.crowncork.com/investors/policies/human-rights-policy</p> <p>The Policies are reviewed annually for continued relevance and suitability. The various ESG Policies are endorsed and supported by Senior Management via the provision of appropriate resources and regular review of their implementation. The ESG Policies are communicated through on-site displays (as confirmed during the</p>

CRITERION	RATING	COMMENT
		Audit), training, and websites for both internal and external Stakeholders. https://www.crowncork.com/investors/governance/corporate-governance-guidelines
2.2a-c Leadership	Conformance	The Entity has implemented a management 'task force' to address major sustainability aspects. Communications relating to this 'task force' are displayed throughout the Entity. Task force members hold regular meetings, and minutes are maintained.
2.3a Environmental and Social Management Systems - Environmental	Conformance	The Entity has developed and implemented a certified Environment Management System in accordance with ISO 14001:2015 for the scope of "Manufacturing and Supplying of two-piece Aluminium cans for beer and beverage", (Certificate number: EMS 665667, issue date 21.02.2023, expiry date 20.02.2026). There are periodic audits undertaken internally as well as regional Environment, Health and Safety (EHS) team assessments, which check ongoing conformance with the Environment Management System against ISO14001.
2.3b Environmental and Social Management Systems - Social	Conformance	The Entity has established a documented Social Management System which is developed in accordance with regional and corporate guidelines. Periodic monitoring is undertaken at both the plant level and regional level for social performance. Good practices have been identified and implemented to work towards sector-specific topics such as heat stress in the workplace.
2.4a-e Responsible Sourcing	Minor Non-Conformance	The Entity adheres to its global Supplier Code Of Conduct (issued in January 2020) and suppliers are expected to also comply with the Code: https://www.crowncork.com/sites/files/2022-03/code-conduct-english.pdf In addition, a corporate Responsible and Ethical Sourcing Policy is in place and includes 2025 and 2030 targets. Progress against these targets is reviewed regularly at the corporate level. https://www.crowncork.com/investors/policies/responsible-and-ethical-sourcing-policy However, the related Responsible Sourcing Policies such as the Supplier Code Of Conduct, and Corporate Responsible and Ethical Sourcing Policy do not define requirements related to Conflict-Affected and High-Risk Areas (CAHRAs) and Modern Slavery.
2.5a-g Environmental and Social Impact Assessments	Not Applicable	This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities. However, the Entity's environmental risk assessment addresses environmental aspects including emissions, waste, and water in accordance with Vietnamese environmental laws. The 2022 Environment Report was submitted to the Department of Resources and Environment and includes environmental, economic and social factors.
2.6a-h Human Rights Impact Assessment	Conformance	This Criterion is not applicable, as there are no New Projects or Major Changes to existing Facilities. However, Human Rights-related risks and impacts have been assessed by the Entity and a mitigation plan has been established. This was last updated in September 2023 and includes employees,

CRITERION	RATING	COMMENT
		security personnel, Local Communities, and third-party contractors within the Entity's supply chain.
2.7a-f Emergency Response Plan	Conformance	The Entity has a documented Emergency Preparedness and Response Plan, which defines possible emergency situations including natural disasters, accidental release or discharges. The Plan is reviewed annually, and drills are conducted, where reports and photographs are maintained. During the Audit, an assessment of the Entity's emergency preparedness was conducted, including random checks of emergency lights, clear aisles, firefighting equipment, and access to the emergency assembly area.
2.8a-d Suspended Operations	Conformance	The Entity has developed and implemented a Business Continuity Procedure. It includes the formation of a crisis team with different teams tasked with specified activities and a recovery plan. There is also a dedicated Typhoon Readiness Plan which incorporates before and after scenarios with responsibilities and clear actions to safeguard assets and human life.
2.9a-b Mergers and Acquisitions	Conformance	The Entity adheres to corporate-level guidelines for Mergers and Acquisitions that address relevant environmental, social, and governance topics for assessment during any Merger or Acquisition activity. Currently, there are no Mergers and/or Acquisitions affecting Entity.
2.10a-b Closure, Decommissioning and Divestment	Conformance	The Entity adheres to corporate-level guidelines for Closure, Decommissioning and Divestment that address relevant environmental, social, and governance topics for assessment. Currently, there is no Closure, Decommissioning or Divestment situation affecting the Entity.
3. TRANSPARENCY		
3.1a-b Sustainability Reporting	Conformance	The Entity is incorporated in the corporate Sustainability Report in which their sustainability performance is disclosed: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
3.2 Non-compliance and Liabilities	Conformance	The Entity does not have any significant fines, judgments, penalties or non-monetary sanctions for failure to comply with Applicable Law. There are also periodic public disclosures to local government authorities, and corporate level Sustainability Reporting to report significant fines, judgments, penalties and non-monetary sanctions, if any.
3.3a-c Payments to Governments	Conformance	The Entity has made payments to the Government on a legal and/or contractual basis (e.g. value added tax (VAT) AND corporate tax). Public disclosure of information on payments made to the Government through financial disclosure required by laws (i.e. financial report).
3.4a-f Stakeholder Complaints, Grievances and Requests for Information	Conformance	The Entity has provided freely accessible means for Stakeholders to report any grievances using the following: https://www.crowncork.com/investors/policies/toll-free-reporting-line https://report.syntrio.com/_StandardCustomURL/LHILandingPage.asp

CRITERION	RATING	COMMENT
4. MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment	Conformance	The Entity has evaluated the life cycle impacts of its major product lines using an international database, known as ecoinvent. The Entity has committed to Crown's corporate (Crown Holdings, Inc.,) Twentyby30 goals for circularity. Further information on the Life Cycle Assessment (LCA) and product recovery is available at: https://www.crowncork.com/sustainability/environment/product-life-cycle
4.1b-c Environmental Life Cycle Assessment - Disclosure	Conformance	The LCA methodology uses a 'cradle-to-grave' approach, which includes recycling rates, and the system boundaries are outlined which include raw material extraction and processing, and upstream transportation. The total of one impact category (e.g. Global Warming Potential (GWP)) is considered. The LCA study addresses all five Aluminium beverage cans manufacturing plants in Vietnam. The Entity has prepared the executive summary of the LCA results which includes all relevant information such as the methodology, standards/tools used, boundary and results. The LCA is communicated with interested customers as required.
4.2 Product Design	Conformance	The Entity is working to review and improve product and process design for resource efficiency, which includes downgauging and a global commitment to avoid or reduce all perfluorinated chemicals. The Entity is also committing to process efficiency improvements to increase line efficiency and reduce spoilage (i.e. process Scrap).
4.3a-b Aluminium Process Scrap	Conformance	The Entity has established targets for the reduction of process Scrap (spoilage) which are monitored by management. 100% of process Scrap is collected according to material grade and processed through a baling press to compress into cubes which are sent to a supplier of raw material (coil).
4.4a-c Collection and Recycling of Products at End of Life - Material Conversion and other Manufacturing	Conformance	The Entity has developed a recycling strategy and is working on a multi-Stakeholder project to analyse the current Aluminium recycling rate in Vietnam, project partners include Emirates Global Aluminium, the Australian Aluminium Council, and Novelis (South Korea). More information is available in the following press release: https://www.crowncork.com/news/can-do-attitude-needed-achieve-100-cent-recycling-rate-all-aluminium-drinks-cans
4.4d Collection and Recycling of Products at End of Life	Conformance	The Entity is working to increase the country's recycling rate with a target approaching 100% by 2030 through actions such as working with a local NGO and Policy advocacy.
5. GREENHOUSE GAS EMISSIONS		
5.1a-b Disclosure of GHG Emissions and Energy Use	Conformance	The Entity follows a corporate practice to collect GHG data through a digital tool which is used by a designated representative to collect all relevant environmental performance data, information and invoices. The Greenhouse Gas (GHG) emissions Scopes 1-3 have been calculated and disclosed at the corporate level. Assurance on environmental data such as GHG Emissions and water is conducted by a third party.

CRITERION	RATING	COMMENT
		For more information, refer to the 2022 Sustainability Report, page 23: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
5.2a Aluminium Smelter GHG Emissions Intensity - Started production after 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.2b Aluminium Smelter GHG Emissions Intensity - In production up to and including 2020	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
5.3a-e GHG Emissions Reduction Plans	Conformance	The Entity's GHG reduction plan is incorporated in the corporate Twentyby30 goal, and its performance in reducing GHG Emissions is disclosed in the 2022 Sustainability Report, pages 20-23: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
5.4 GHG Emissions Management	Conformance	The Entity has established a Management System and implemented practices such as collecting and reviewing GHG data and establishing reduction plans with periodic reviews.
6. EMISSIONS, EFFLUENTS AND WASTE		
6.1a-f Emissions to Air	Conformance	The Entity is provided with an emissions monitoring report every quarter from a third party. The report includes monitoring of the stacks' emissions and workplace air quality, and the emission performance is well within the prescribed limits. The Emissions To Air, including NOx (excluding N ₂ O), SOx, Volatile Organic Compounds (VOCs), and particulate matter (PM ₁₀) resulting from its activities, have been identified, and efforts for their reduction have been made. Emissions To Air disclosures are available in the 2022 Sustainability Report on pages 10, 67, and 69: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
6.2a-g Discharges to Water	Conformance	The Entity has dedicated drains and channels to collect process (washer) wastewater for primary treatment (neutralisation). Subsequently, the initially treated water is sent to the industrial authority and a sample is collected by an external agency each month. There are efforts to further reduce wastewater generation and reuse initially treated water in alternative applications like toilets. Water management and associated risks including Discharges To Water from its Business activities and its reduction plans are considered of high priority and are disclosed in the 2022 Sustainability Report, pages 10, 26 and 27: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
6.3a-g Assessment and Management of Spills and Leakages	Conformance	The Entity has conducted a spillage risk assessment for chemicals and wastewater. The spillage handling preparedness includes periodic drills and records are maintained. There have been no Spills within the last two years. Monthly checks of chemical storage conditions are undertaken, including the availability and condition of

CRITERION	RATING	COMMENT
		spill kits During the Audit, no spillage was noted. The oil spillage from any production equipment such as body makers is collected in a closed-loop/drain, or sump tank and is sent to a supplier for further handling. Other process spillages such as coolant are collected in a Filter Coolant Reservoir (FCR), filtrated and re-used. Both practices were checked during the Audit. The Entity's information on Spills and Leakages management is available in the 2022 Sustainability Report, pages 27 and 49: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
6.4a-b Public Disclosure of Spills and Leakages	Conformance	The Entity has a procedure for reporting any Spills using an internal IT-based tool. If any Spills occur in the local or municipal drain, the incident will be reported to the regional Crown team. The Entity complies with the Vietnam Chemicals Decree (No. 113/2017/ND-CP) for reporting any Spills to the authorities and to affected Stakeholders in the vicinity where it operates. There have been no Spills, and as a result, the Entity has not had to report to the authorities in recent years.
6.5a-c Waste Management and Reporting	Conformance	The Entity has a documented Standard Operating Procedure (SOPs) covering different types of wastes (Hazardous, Non-Hazardous) and mapped them with different processing activities. The waste management plan lists the responsibilities of personnel and covers environmental aspects and impacts. The Entity reports annually to the Government authorities by providing a waste summary. All waste types and quantities are reported and disclosed annually in the 2022 Sustainability Report, page 33: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
6.6a-g Bauxite Residue	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.7a-f Spent Pot Lining (SPL)	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
6.8a-d Dross	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
7. WATER STEWARDSHIP		
7.1a-b Water Assessment and Disclosure	Conformance	A water flow diagram has been prepared, indicating the quantity of water consumed at major stages. The water risk assessment takes into account the relationship between water use and availability in the Da Nang region. The proportional relationship between the water use of the Crown Da Nang site and the water availability in the Da Nang region is balanced. Based on the results of the water risk assessment using the WRI Aqueduct tool, the Da Nang site is located in an area of low to medium water stress. Water withdrawal by source and type is available in the 2022 Sustainability Report, pages 26-27: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
7.2a-e Water Management	Conformance	The results of the water risk assessment using the WRI Aqueduct tool, confirm that the Da Nang site is located in an area of low to medium water stress. The unit-level water management plan includes water

CRITERION	RATING	COMMENT
		<p>metering, usage monitoring, and preventing water Leakages with water-saving projects like washery nozzle efficiency.</p> <p>The corporate-level water management and performance are available in the 2022 Sustainability Report, page 26: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf</p>
8. BIODIVERSITY AND ECOSYSTEM SERVICES		
8.1a Biodiversity and Ecosystem Services Risk and Impact Assessment	Conformance	The Entity has conducted an on-site Biodiversity assessment using an external agency, the Integrated Biodiversity Assessment Tool (IBAT) and WRI Aqueduct assessment tools. The results showed that there are zero to low impacts on Biodiversity and according to the Biodiversity and Ecosystem Services Risk and Impact Assessment, there are no priority Ecosystem Services present.
8.1b Biodiversity and Ecosystem Services Risk and Impact Assessment - Priority	Not Applicable	This Criterion is not applicable to the Entity, as the risk to, and impacts on Biodiversity and Ecosystem Services were determined to be zero to low. There are no Priority Ecosystem Services according to the Biodiversity and Ecosystem Services Risk and Impact Assessment.
8.2a-g Biodiversity Management	Not Applicable	<p>This Criterion is not applicable to the Entity, as the risk to, and impacts on Biodiversity and Ecosystem Services were determined to be zero to low. There is no identification of Priority Ecosystem Services according to the outcome of the Biodiversity and Ecosystem Services Risk and Impact Assessment.</p> <p>However, there is a documented Biodiversity Management Plan specific to the unit and area based on recommendations for improvement and fulfilling the ambitions of the Corporate Twentyby30 program. The Entity has developed a Biodiversity management plan in consultation with employees and external Stakeholders and their perspectives, and inputs have been incorporated.</p>
8.3a-c Management of Priority Ecosystem Services	Not Applicable	This Criterion is not applicable to the Entity as there is no dependence on Priority Ecosystem Services according to the outcome of the Biodiversity and Ecosystem Services Risk and Impact Assessment.
8.4 Alien Species	Conformance	The Entity has a documented risk assessment and control measures to prevent the introduction of Alien Species and remediate areas affected by Alien Species.
8.5a-b Commitment to "No Go" in World Heritage Properties	Conformance	The Entity is located within an industrial zone and is not close to any cultural or sacred heritage sites. However, the Entity has made a commitment to "No Go" in World Heritage properties.
8.6a-d Protected Areas	Conformance	The Entity is not located nearby designated Protected Areas as a result does not directly impact these areas.
8.6e Protected Areas - Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.
8.7a-i Mine Rehabilitation	Not Applicable	This Criterion is not applicable to the Entity's Certification Scope.

CRITERION	RATING	COMMENT
9. HUMAN RIGHTS		
9.1a-d Human Rights Due Diligence	Conformance	<p>The Entity has developed a Human Rights Policy (last updated in July 2023): https://www.crowncork.com/sites/files/2023-08/Crown_Human%20Rights%20Policy%202023.pdf</p> <p>Related training is provided to both operators and executives. The Human Rights is part of the corporate Twentyby30 goal: https://www.crowncork.com/sustainability/twentyby30-goals/working-together</p> <p>Human Rights-related risks and impacts have been assessed and a mitigation plan has been identified covering Crown employees, security personnel, Local Communities, and third-party contractors in supply chains. Human Rights Due Diligence is undertaken using a systematic approach through mapping and analysis using assessment criteria followed by an action plan. The Entity uses a complaints system, called Lighthouse: https://www.crowncork.com/investors/policies/whistleblowing-and-business-ethics-hotline-policy</p> <p>No complaints have been received to date. At the plant level, grievances are handled by the employees' welfare committee. Information on human resources is available in the 2022 Sustainability Report, page 65: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf</p>
9.2a-e Gender Equity and Women's Empowerment	Minor Non-Conformance	<p>The Entity is incorporated into the corporate commitment towards diversity and inclusion: https://www.crowncork.com/sustainability/social/diversity-inclusion</p> <p>There are women representatives as part of the employees' welfare committee. However, there is no Diversity and Inclusion Committee or related discussions at the Entity level in line with corporate ambitions and the Twentyby30 goals regarding Gender Equity and Women's Empowerment: https://www.crowncork.com/sustainability/twentyby30-goals/working-together</p>
9.3a-i Indigenous Peoples	Minor Non-Conformance	<p>As a multi-ethnic country, Vietnam has fifty-four recognised ethnic groups, fifty-three of which are ethnic minorities. These groups comprise an estimated 14.1 million people or around 14.7% of the country's total population of approx. 96 million. Vietnam has not ratified the ILO Convention No. 169, although Vietnam has voted in favour of the UNDRIP, it does not recognise ethnic minorities as Indigenous Peoples. The Entity has not conducted an analysis of the existence of ethnic communities based on the International Work Group for Indigenous Affairs (IWGIA) within their Area of Influence and the impacts of their Business activities.</p>
9.4a Free, Prior, and Informed Consent (FPIC) - New Projects or Major Changes	Not Applicable	<p>This Criterion is not applicable, as there are no New Projects or Major Changes to existing operations where Free, Prior, and Informed Consent (FPIC) is required.</p>
9.4b Free, Prior, and Informed Consent (FPIC) - Bauxite Mining	Not Applicable	<p>This Criterion is not applicable to the Entity's Certification Scope.</p>

CRITERION	RATING	COMMENT
9.4c Free, Prior, and Informed Consent (FPIC) - Demonstrate support	Not Applicable	This Criterion is not applicable, as there are no New Projects or Major Changes to existing operations where Free, Prior, and Informed Consent (FPIC) is required.
9.5a Cultural and Sacred Heritage - Identification	Conformance	The nearest cultural heritage feature is the Hải Vân Pass (Nam Hai Van), which is approximately 30 kilometres from the Entity. This feature is included in the Entity's checklist for the establishment of a new plant.
9.5b Cultural and Sacred Heritage - Impacts	Conformance	This Criterion is not applicable, as there are no New Projects or Major Changes to existing operations where Free, Prior, and Informed Consent (FPIC) is required. The Entity's activities do not negatively affect the nearby cultural and heritage site, instead, its impact is positive through providing employment and contributing to economic development.
9.6a-i Displacement	Not Applicable	This Criterion is not applicable as the Entity is operating within a government-managed Industrial Park. No resettlements or relocations were required as a result of the Entity's operations or the construction of the beverage can plant in Da Nang in 2013.
9.7a-h Affected Populations and Organisations	Conformance	The Entity operates within a Government Industrial Park, there is a Local Community outside the industrial area, and many of the employees live nearby thus providing employment opportunities. The Entity undertakes activities and initiatives such as Children's Day within a nearby community, a blood donation camp and supported flood relief measures. There are no complaints from the community regarding the plant's environmental impacts. The Entity has received the Environment award from the Da Nang city government for the initiation and implementation of environment protection programs (e.g. Circular Economy etc.).
9.8a Conflict-Affected and High-Risk Areas - Strong Management Systems	Minor Non-Conformance	The Supplier Code Of Conduct does not address Conflict-Affected and High-Risk Areas (CAHRAs) requirements. The Entity has not established a robust Management System to address CAHRAs, including a Supply Chain Policy, responsibilities and resources, information gathering and supplier engagement.
9.8b Conflict-Affected and High-Risk Areas - Identify and assess risks	Conformance	The Entity has conducted a supply chain risk assessment and identified CAHRAs according to EU Regulation 2017/821 Supply chain Due Diligence, all the existing suppliers are rated low risk for all types of Aluminium.
9.8c Conflict-Affected and High-Risk Areas - Strategy to respond to risks	Not Applicable	This Criterion is not applicable, as no risks regarding CAHRAs have been identified.
9.8d Conflict-Affected and High-Risk Areas - Audit of Due Diligence	Conformance	This ASI Performance Standard Audit addresses the requirements of this Criterion. When a high-risk supplier is identified, they are also audited.
9.8e Conflict-Affected and High-Risk Areas - Report annually	Conformance	There are no high-risk suppliers currently identified and therefore no supplier audits have been conducted to date. The Entity at corporate level has disclosed information on supplier audits in the 2022 Sustainability Report, page 40:

CRITERION	RATING	COMMENT
		https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf
9.9 Security practice	Conformance	Security practices are part of the Entity's Human Rights risk assessment. The security guard's practices are suitable and aligned with Human Rights. The security service providers and staff recognise and implement good practices in respecting Human Rights when carrying out their security practices.
10. LABOUR RIGHTS		
10.1a-c Freedom of Association and Right to Collective Bargaining	Conformance	<p>The Freedom of Association and Right to Collective Bargaining is recognised in the Entity's Human Rights Policy: https://www.crowncork.com/investors/policies/human-rights-policy</p> <p>There is a Trade Union as per Vietnamese labour law which is democratically elected and communicated to the Hi-Tech Industrial Park (Industrial area) Trade Union and formally accepted letter. There is a Collective Bargaining agreement signed by the Chairperson of the Trade Union and Entity management which stipulates major employment conditions such as working hours, wages, Overtime and salary increases. The Collective Bargaining agreement contents are displayed on the canteen notice board and Workers interviewed during the Audit confirmed their understanding of the agreement. The collective agreement and information on the Trade Union are shared with the Government authority (i.e. Department of Labour).</p> <p>The Entity's Human Rights Policy: includes a commitment to respect the rights of Workers to collectively bargain and participate in any Collective Bargaining process in good faith to the extent possible under Applicable Law.</p>
10.1d Freedom of Association and Right to Collective Bargaining - Alternative means in context of Applicable Law	Not Applicable	This Criterion is not applicable to the Entity, as Vietnamese labour law does not restrict the right to Freedom Of Association, although it is regulated, and Collective Bargaining is not restricted by law.
10.2a Child Labour	Conformance	<p>The Entity does not use or support Hazardous Child Labour or the Worst Forms Of Child Labour in its Business activities. Age verification is part of the hiring process and is recorded as part of employment records.</p> <p>Prohibition of Child Labour is referenced in the Human Rights Policy: https://www.crowncork.com/investors/policies/human-rights-policy</p>
10.3a-c Forced Labour	Minor Non-Conformance	<p>The Entity is not engaged in, or support Forced Labour, either directly or indirectly through any employment or recruitment agencies. The Entity does not require Migrant Workers to lodge deposits, hold Workers in Debt Bondage, retain original copies of Workers' identity papers, or deny Workers the freedom to terminate their employment without penalty.</p> <p>Forced Labour is included in the Human Rights Policy: https://www.crowncork.com/investors/policies/human-rights-policy</p> <p>Currently, there is no Modern Slavery Statement that has been developed specific to the Entity. However, the Entity is considering the development of a unified Modern Slavery performance disclosure for</p>

CRITERION	RATING	COMMENT
		the Crown Group, which would be either a stand-alone document or incorporated as part of future Sustainability Reports. Currently, the Entity does not have an annual statement describing its actions to address Modern Slavery.
10.4a-c Non-Discrimination	Conformance	<p>The Entity upholds non-Discrimination in hiring, training, and promotions (e.g. interviews are conducted by more than one person). Training requirements are determined and provided based on the competency matrix. The Entity promotes a culture of non-Discrimination through Policy commitments, training and Grievance Mechanisms.</p> <p>Discrimination is addressed in the Human Rights Policy: https://www.crowncork.com/investors/policies/human-rights-policy.</p>
10.5 Communication and engagement	Conformance	There is an employee communication procedure detailing various channels of communication, the relevant topics and responsibilities.
10.6a-g Violence and Harassment	Conformance	The Entity has established a Welfare Committee consisting of Senior Management and employee representatives to discuss issues including remuneration, benefits and the working environment. Meetings are held quarterly and are documented. There is a written Policy on 'disciplinary action' which prohibits corporal punishment, mental or physical coercion, Harassment and gender-based Violence, including sexual Harassment, and the verbal abuse of Workers. The Workers' understanding of the disciplinary rules was checked during interviews and found to be satisfactory.
10.7a-c Remuneration	Conformance	The Entity has conducted a salary survey that assessed employees across different functions, their gender, and social status. The minimum wage paid by the Entity is above the legal minimum wage for a standard working month plus additional benefits including shift allowance, travel allowances and bonuses. The salary is paid monthly via bank transfer. Overtime worked is paid at a premium rate in accordance with Applicable Law (i.e. 150% on normal weekdays and 200% for working on weekly holidays).
10.8a-c Working Time	Minor Non-Conformance	<p>Working hours at the Entity are within national legal limits and are recorded using a biometric attendance system. The Entity monitors working hours and Overtime using statistical tools such as run charts. Information on working hours, paid leave and public holidays is included in the employee handbook.</p> <p>However, there have been some isolated cases identified where the weekly leave for guards has been extended beyond six days. In November, for example, one guard worked continuously for eight days. The responsible staff have analysed the cause and taken corrective action, such as internal monitoring, approvals and discussions with the service provider to improve planning. Interviews with security personnel are also conducted to ensure compliance with other applicable requirements.</p>
10.9a-b Informing Workers of Rights	Conformance	The Entity informs Workers of their rights through periodic training, 'Town Hall' meetings, and Grievance Mechanisms. There is a channel provided for employee's suggestions and complaints, if and as received.

CRITERION	RATING	COMMENT
11. OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Management System	Conformance	The Entity has implemented an Occupational Health and Safety (OH&S) Management System, which consists of the Environmental, Health and Safety Policy, the monitoring and review of procedures in accordance with ISO 45001:2018 and the Crown Corporate OH&S Policy.
11.1b-e Occupational Health and Safety (OH&S) Management System - Reviews and disclosure	Conformance	<p>The OH&S Management System is documented and comprises of Standard Operating Procedures (SOPs), OH&S and the First Aid room. The SOPs include lockout-tagout, personnel hygiene and allergen control programs. There is also periodic reporting undertaken to Government authorities on OH&S performance.</p> <p>The Entity's OH&S performance is disclosed in the 2022 Sustainability Report, pages 38-39: https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf</p>
11.2 Employee engagement on Health and Safety	Conformance	<p>The Entity's employees are provided OH&S training according to the job risk assessment. There is a periodic meeting of the workplace Safety Committee to discuss and engage employees on safety topics. There is a visual display of safety topics provided to Workers and contractors to inform and engage on safety issues. More information is included in the 2022 Sustainability Report, page 38:</p> <p>https://www.crowncork.com/sites/files/2023-06/2022-Crown-Holdings-Sustainability-Report.pdf</p>

ASI LIMITATION OF LIABILITY DISCLAIMER

Organisations that make ASI-related claims are each responsible for their own Compliance with Applicable Law, including laws and regulations related to labelling, advertisement, and consumer protection, and competition or antitrust laws, at all times. ASI does not accept liability for any violations of Applicable Law or any infringement of third-party rights (each a Breach) by other organisations, even where such Breach arises in relation to, or in reliance upon, any ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI. ASI gives no undertaking, representation or warranty that compliance with an ASI Standard, document or other material, recommendation or directive issued by or on behalf of ASI will result in compliance with any Applicable Law, or will avoid any Breach from occurring.

DOCUMENT CONTROL AND VERSION HISTORY

REVISION	DATE	NOTES
0	25 June 2024	Initial Certification Audit – Full Certification