

ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

BALL BEVERAGE PACKAGING NORTH & CENTRAL AMERICA

CERTIFICATE
NUMBER

179

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI ACCREDITED
AUDITOR

BUREAU
VERITAS
CERTIFICATION

DATE OF ISSUE

9 MARCH 2022

DATE OF EXPIRY

8 MARCH 2025

CERTIFIED SINCE

9 MARCH 2022

AUTHORISED BY

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

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

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

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

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

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

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

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

SUMMARY AUDIT REPORT

PERFORMANCE STANDARD

OVERVIEW

| | |
|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MEMBER NAME | Ball Corporation |
| ENTITY NAME | Ball Beverage Packaging North & Central America |
| CERTIFICATION SCOPE | <p>Management activities for centralized operational functions, global support functions, quality assurance and graphics at the regional headquarters in Westminster (CO), in the United States of America.</p> <p>Manufacturing of Beverage Can Bodies at facilities in the United States including Fairfield, (CA); Fort Atkinson (WI); Fort Worth (TX); Glendale (AZ); Goodyear (AZ); Kapolei (HI); Monticello (IN); Pittston (PA); Rome (GA); Saratoga Springs (NY); Tampa (FL); and Williamsburg (VA); and Whitby in Canada; and Queretaro in Mexico.</p> <p>Manufacturing of Beverage Can Ends at: Bowling Green (KY), United States.</p> <p>Manufacturing of Beverage Can Bodies and Can Ends at: Findlay (OH), United States and Monterrey, Mexico.</p> <p>Manufacturing of Beverage Can Bodies and Alumi-Tek Bottles at: Conroe (TX), United States.</p> <p>Manufacturing of Beverage Can Bodies, Can Ends and Alumi-Tek Bottles at: Golden (CO) and the BTIC (Technology and Innovation Centre) (CO), United States.</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 (14 June – 16 December 2021)• Surveillance Audit and Scope Change (3 November – 15 December 2024) |
| AUDIT FIRM | Bureau Veritas Certification |
| AUDIT DATE | <ul style="list-style-type: none">• 14 June – 16 December 2021 (Initial Certification Audit)• 3 November – 15 December 2024 (Surveillance Audit and Scope Change) |
| AUDIT REPORT SUBMISSION | <ul style="list-style-type: none">• 19 January 2022 (Initial Certification Audit)• 3 January 2025 (Surveillance Audit and Scope Change) |
| AUDIT SCOPE | <u>Initial Certification Audit (14 June – 16 December 2021)</u> |

The Audit Scope covers Ball Beverage Packaging North and Central America at headquarters (Beverage Packaging Office Centre), Colorado (USA); manufacturing of Beverage Can Bodies at Fort Atkinson (USA), Goodyear (USA) and Queretaro (Mexico) facilities; and manufacturing of Beverage Can Bodies and Ends at Monterrey (Mexico) and BTIC (Beverage Technology and Innovation Center) (USA).

The ASI multi-site sampling approach was undertaken to include facilities in the United States including Fairfield, Fort Worth, Glendale, Golden, Kapolei, Kent, Monticello, Phoenix, Pittston, Rome, Saratoga Springs, St. Paul, Tampa, Wallkill, Williamsburg, Bowling Green, Findlay, Conroe and Golden (USA) and Whitby in Canada.

The supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant Criteria in the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit and Scope Change (3 November – 15 December 2024)

The Audit Scope covered Ball Beverage Packaging North and Central America at headquarters (Beverage Packaging Office Centre), Colorado (USA); manufacturing of Beverage Can Bodies at Glendale (USA) and Tampa (USA); and manufacturing of Beverage Can Ends at Bowling Green (USA).

The ASI multi-site sampling approach was undertaken to include Conroe, Fairfield, Findlay, Fort Atkinson, Fort Worth, Golden, Goodyear, Kapolei, Monticello, Pittston, Rome, Saratoga Springs, and Williamsburg (USA); Monterrey and Queretaro (Mexico); and Whitby (Canada).

The supply chain activities included in the audit scope:

- Material Conversion (Production and Transformation)

All relevant 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

9 March 2022 – 8 March 2025

NEXT AUDIT
TYPE

Re-Certification Audit

NEXT AUDIT
DUE DATE

8 March 2025

CERTIFICATE
NUMBER

179

SUMMARY OF FINDINGS

| CRITERION | RATING | COMMENT |
|----------------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| PRINCIPLE 1 BUSINESS INTEGRITY | | |
| 1.1 Legal Compliance | Conformance | The Legal, EHS, and Quality Departments have maintained a list of applicable legal requirements and monitor and evaluated to determine how these legal obligations apply to the Entity's operations. The Entity's Legal, EHS, and Quality Departments have engaged third-party vendors to provide the data services required to access applicable environmental, social, and company governance laws and regulations for their jurisdictions. |
| 1.2 Anti-Corruption | Conformance | The Entity has maintained a Foreign Corrupt Practices/Global Anti-Corruption Policy that outlines Compliance with Anti-Corruption laws in the Entity's operating countries and prohibits all forms of Bribery and Corruption. |
| 1.3 Code of Conduct | Conformance | The Entity's Code of Conduct is designed to identify common Compliance issues, including Corruption, and to provide clear guidance and resources to help all employees make the right decisions. The Code of Conduct is published on the website and is available in all languages where Entity operates: https://www.ball.com/our-company/code-of-conduct |
| PRINCIPLE 2 POLICY & MANAGEMENT | | |
| 2.1a Environmental, Social, and Governance Policy (implement and maintain) | Conformance | The Entity has integrated Management System Policies outlining the overall company commitment to meet or exceed customer expectations, to protect the environment, to ensure the health and safety of products, employees and contractors, and to operate responsibly in the communities where they operate. |
| 2.1b Environmental, Social, and Governance Policy (senior management) | Conformance | The integrated Management System Policies have been signed by the Entity's senior leadership and all Facilities have completed an attestation adopting the Policy. |
| 2.1c Environmental, Social, and Governance Policy (communication) | Conformance | The senior leadership have endorsed the Management System Policy and each Facility has completed an attestation adopting the Policies. The Entity's global Policies are available on its website and are communicated to internal and external Stakeholders: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 2.2 Leadership | Conformance | The Entity's Vice President of Operations is responsible and accountable for ensuring that the |

| CRITERION | RATING | COMMENT |
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| | | Entity's ASI Management System achieves its intended outcomes. |
| 2.3a Environmental and Social Management Systems (environmental) | Conformance | The Entity maintains an integrated Management System designed to meet the requirements of ISO 14001, ISO 45001, FSSC 22000, SMETA 4-Pillar, and the ASI Standards. |
| 2.3b Environmental and Social Management Systems (social) | Conformance | The Entity maintains an integrated Management System designed to meet the requirements of ISO 14001, ISO 45001, FSSC 22000, SMETA 4-Pillar, and the ASI Standards. |
| 2.4 Responsible Sourcing | Conformance | The Entity has established its Supplier Guiding Principles, which outlines the business conduct standards for all suppliers, including employment practices, Human Rights, environment, health and safety, antitrust, Bribery, and anti-Corruption. https://www.ball.com/our-company/supplier-resources/supplier-sustainability |
| 2.5 Impact Assessments | Conformance | As part of the Due Diligence process for New Projects or Major Changes to existing Facilities, the Entity consults the local regulatory agencies to determine whether new or modified regulatory permits are required. |
| 2.6 Emergency Response Plan | Conformance | Each site has established an Emergency Contingency Plan (ECP) utilising a standardised template to identify the potential for and respond to incidents and emergencies to prevent and mitigate the environmental, occupational health and safety impacts, injuries or illnesses, and associated property damage. ECPs are reviewed and updated at least annually and include response and rescue activities where required. |
| 2.7 Mergers and Acquisitions | Conformance | As part of the Due Diligence process for mergers and acquisitions, the Entity reviews all environmental and social aspects in the planning process. The Entity has established site selection and Due Diligence requirements that are used during each merger, acquisition, including new builds. |
| 2.8 Closure, Decommissioning and Divestment | Conformance | As part of the Due Diligence process for plant closures and decommissions, the Entity reviews all environmental and social aspects in the planning process. The Entity has established site selection and Due Diligence requirements that are used during closure, decommissioning and divestment. |

| CRITERION | RATING | COMMENT |
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| 3.1 Sustainability Reporting | Conformance | The Entity has published a Combined Annual and Sustainability Report in conformance with the Global Reporting Initiative (GRI) standard, available at: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 3.2 Non-compliance and liabilities | Conformance | The Entity has publicly disclosed information on significant fines, judgments, penalties and non-monetary sanctions in the Combined Annual and Sustainability Report and the GRI Index. The GRI Index is available at: https://www.ball.com/getattachment/e0e7b2a3-5c68-4284-8f49-0a7bf45b3505/Ball-2023-GRI-Content-Index-Response_March-2023.pdf |
| 3.3a Payments to governments (legal and contractual) | Conformance | The Entity only makes payments to governments on a legal and/or contractual basis in alignment with the Ball Code of Conduct and the Foreign Corrupt Practices/Global Anti-Corruption Policy. |
| 3.3b Payments to governments (disclosure - bauxite mining) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 3.4 Stakeholder complaints, grievances and requests for information | Conformance | The Entity's customer complaints are logged into a Data Management System. Product quality issues and significant delivery or service issues are investigated and resolved in accordance with the Entity's Corporate Quality Procedure and Code of Conduct. Ethics complaints can be anonymously reported to the Compliance Hotline at: www.ballcompliancehotline.com |
| PRINCIPLE 4 MATERIAL STEWARDSHIP | | |
| 4.1a Environmental Life Cycle Assessment (life cycle impacts) | Conformance | Ball Corporation has conducted peer-reviewed comparative Life Cycle Assessments (LCA) for its major Products where Aluminium is used. The LCA focuses on environmental life cycle impacts of these Products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and comparability of assessments. The Beverage Packaging LCA is available at: https://www.ball.com/getattachment/85d9e3af-e3aa-4b93-a687-5b34888b2bfc/Ball-Comparative-2020-LCA-full-report-FINAL.pdf |
| 4.1b Environmental Life Cycle Assessment (cradle to gate) | Conformance | Ball Corporation has conducted peer-reviewed comparative Life Cycle Assessments (LCA) for its major Products where Aluminium is used. The LCA focuses on environmental life cycle impacts of these Products and was conducted in accordance with ISO 14040 and ISO 14044 to advance consistency and |

| CRITERION | RATING | COMMENT |
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| | | <p>comparability of assessments. The Beverage Packaging LCA is available at https://www.ball.com/getattachment/85d9e3af-e3aa-4b93-a687-5b34888b2bfc/Ball-Comparative-2020-LCA-full-report-FINAL.pdf</p> |
| 4.1c Environmental Life Cycle Assessment (public communication) | Conformance | <p>Ball Corporation communicates its LCA on the website, available at: https://www.ball.com/getattachment/85d9e3af-e3aa-4b93-a687-5b34888b2bfc/Ball-Comparative-2020-LCA-full-report-FINAL.pdf</p> |
| 4.2 Product design | Conformance | <p>The Entity has reduced the overall weight of Aluminium beverage cans through both downgauging and light-weighting. In addition, the Entity proactively works with its coating suppliers to develop effective products that meet expectations for transparency and safety. The Entity is committed to removing any materials of concern (such as bisphenol A and PFAS) from the internal coatings. The Entity also aim to receive 'Cradle-to-Cradle Material Health Certifications' (Silver or above) for all inks and coatings by 2030. These goals are publicly disclosed at: https://www.ball.com/sustainability/goals</p> |
| 4.3a Aluminium Process Scrap (targets) | Conformance | <p>The Entity is committed to reducing spoilage and recycling Aluminium Process Scrap. Each Facility has a spoilage target. Approximately 87% of the total waste generated at the Entity is manufacturing Scrap.</p> |
| 4.3b Aluminium Process Scrap (alloy separation) | Conformance | <p>The Entity is committed to reducing spoilage and recycling Aluminium Process Scrap. Each Facility has processes to separate different classes of Aluminium.</p> |
| 4.4a Collection and recycling of products at end-of-life (strategy) | Conformance | <p>The Entity is committed to increasing its recycling rates. Its goal is to drive the global recycling rate of beverage cans, bottles and cups to 90% by 2030, as published in the Entity's sustainability goals: https://www.ball.com/sustainability/goals</p> |
| 4.4b Collection and recycling of products at end-of-life (engagement) | Conformance | <p>The Entity proactively engages in federal, state and local policy solutions to increase collection rates and the effectiveness of recycling systems (i.e. deposit return schemes) and policies. The Entity engages with customers to increase access to collection, educates on the benefits of recycling, and engages with recycling facilities directly. Further details are available on the website: https://www.ball.com/sustainability/real-circularity</p> |

| CRITERION | RATING | COMMENT |
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| PRINCIPLE 5 GREENHOUSE GAS EMISSIONS | | |
| 5.1 Disclosure of GHG emissions and energy use | Conformance | Ball Corporation's GHG emissions data are provided publicly at various levels, including global, regional, and country, as well as by business segment. The Entity's GHG emissions data are available in both the 2023 Combined Annual and Sustainability Report and the Sustainability Data Center: https://www.ball.com/sustainability/sustainability-reporting/downloads https://www.ball.com/sustainability/sustainability-reporting/data-center |
| 5.2 GHG emissions reductions | Conformance | The Entity has established GHG emissions reduction goals, which are part of the Ball Corporation goals published in the 2023 Combined Annual and Sustainability Report: https://www.ball.com/sustainability/goals https://www.ball.com/sustainability/sustainability-reporting/data-center |
| 5.3a Aluminium Smelting (management system) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3b Aluminium Smelting (up to and including 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 5.3c Aluminium Smelting (after 2020) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE | | |
| 6.1 Emissions to Air | Conformance | The Entity is regulated and each Facility has a site-specific permit with emission limits. Each Facility tracks and reports Emissions to Air and emission calculations are completed at least monthly. |
| 6.2 Discharges to Water | Conformance | The Entity is regulated and each Facility has a site-specific permit with discharge limits. Pre-treatment of industrial wastewater prior to discharge to the local government or privately owned treatment facilities is required. |
| 6.3a Assessment and Management of Spills and Leakage (assessment) | Conformance | The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for the assessment and management of Spills. Each location has a site-specific plan that outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage. |

| CRITERION | RATING | COMMENT |
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| 6.3b Assessment and Management of Spills and Leakage (management) | Conformance | The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for the assessment and management of Spills. Each location has a site-specific plan that outlines effective responses, including control and recovery, for a range of potential emergency events including Spills and Leakage. |
| 6.4a Reporting of Spills (immediate disclosure) | Conformance | The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for responding to and disclosing Spills. |
| 6.4b Reporting of Spills (regular reporting) | Conformance | The Entity has developed and implemented an Emergency Contingency Plan (ECP) which includes requirements for responding to and disclosing Spills. The Entity discloses information on major Spills within the Sustainability Report as required: |
| 6.5a Waste management and reporting (strategy) | Conformance | The Entity generates various Non-Hazardous and Hazardous Wastes that are regulated by the applicable environmental protection agencies. Each Facility has an EPA Identification Number and tracks the quantity of Hazardous Waste generated each month to determine its generator status. Waste volumes are reported in the 2023 Combined Annual Sustainability Report: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 6.5b Waste management and reporting (disclosure) | Conformance | The Entity has a Waste management and reporting strategy and has established Key Performance Indicators (KPI's) to track the quantity of Waste generated, which is reported as part of the Sustainability Scorecard and published monthly. Ball Corporation reports its total Waste by disposal method as part of its global Combined Annual and Sustainability Report: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 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. |

| CRITERION | RATING | COMMENT |
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| 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

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| 7.1a Water assessment (mapping) | Conformance | The Entity withdraws water from various sources for use in the manufacturing process. Water withdrawals are measured at least monthly via meter readings and utility bill tracking. Water usage and efficiency goals are disclosed in the Combined Annual and Sustainability Report: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 7.1b Water assessment (risk assessment) | Conformance | The Entity utilizes the World Resources Institute (WRI) Aqueduct risk analysis tool to determine water-related risks. It determined that 13% of Facilities are in medium-high-risk locations and the same number are in high-risk areas. https://www.ball.com/sustainability/product-stewardship/resource-efficiency |
| 7.2a Water management (management plans) | Conformance | The Entity's management team analyses and evaluates appropriate data and information arising from monitoring and measurement of water usage and has established clear and ambitious water use reduction goals for 2030, available at: |

| CRITERION | RATING | COMMENT |
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| | | https://www.ball.com/sustainability/goals |
| 7.2b Water management (monitoring) | Conformance | Water withdrawals are regularly measured and monitored. Water consumption is a Key Performance Indicator (KPI) and relevant data is publicly available. The effectiveness of the water management plans and actions is reviewed annually. |
| 7.3 Disclosure of water usage and risks | Conformance | Ball Corporation discloses water usage in both the Combined Annual and Sustainability Report and the Sustainability Data Center website: https://www.ball.com/sustainability/sustainability-reporting https://www.ball.com/sustainability/sustainability-reporting/data-center |
| PRINCIPLE 8 BIODIVERSITY | | |
| 8.1 Biodiversity assessment | Conformance | The Entity has established a Biodiversity Policy outlining the requirements for completing annual site-level Biodiversity assessments and establishing action plans to remediate any areas of concern. The Biodiversity Policy is available at: https://www.ball.com/getattachment/cdfc4728-122c-4311-a0a8-3f06a5540a9f/Biodiversity-Policy_Final_07282023.pdf |
| 8.2a Biodiversity management (biodiversity action plans) | Conformance | The Entity has developed an internal Biodiversity checklist, which is completed annually. Categories identified as high-risk in the checklist require the Facility to develop and implement a Biodiversity Action Plan. |
| 8.2b Biodiversity management (consultation and mitigation hierarchy) | Conformance | The Entity has developed an internal Biodiversity checklist that is completed annually. Categories identified as high-risk in the checklist require the Facility to develop and implement a Biodiversity Action Plan that includes appropriate time-bound targets and is tracked as part of the monthly EHS Scorecard review. |
| 8.2c Biodiversity management (reporting) | Conformance | The Entity has completed a Biodiversity Assessment for its Facilities using the Integrated Biodiversity Assessment Tool (IBAT). The EHS team has also incorporated a Biodiversity checklist into its aspects and impacts assessment, which each Facility completes annually to identify any known issues on the surrounding Biodiversity. Further information is available at: https://www.ball.com/sustainability/operational-excellence |

| CRITERION | RATING | COMMENT |
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| 8.3 Alien Species | Conformance | The Entity has developed a Biodiversity checklist to evaluate the risk of Alien Species. Identified risks are added to each Facility's annual aspects and impact assessment. |
| 8.4a Commitment to "No Go" in World Heritage properties (exploration and new mines) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 8.4b Commitment to "No Go" in World Heritage properties (existing operations) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 8.5a Mine rehabilitation (best available techniques) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| 8.5b Mine rehabilitation (financial provisions) | Not Applicable | This Criterion is not applicable to the Entity's Certification Scope. |
| PRINCIPLE 9 HUMAN RIGHTS | | |
| 9.1a Human Rights Due Diligence (policy) | Conformance | The Entity has established a Human Rights Policy and a Human Trafficking Statement to support the commitment to treating people with dignity and respect, available at: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 9.1b Human Rights Due Diligence (process) | Conformance | The Entity has established a Human Rights Due Diligence process including Human Rights Policy, Business Ethics Code of Conduct, Supplier Code of Conduct and Modern Slavery Statement and seeks to avoid direct and indirect involvement in Human Rights abuses. The Entity undertakes a SMETA 4-Pillar audit every three years, covering the areas of Labour Rights, Freedom of Association, Child Labour, working hours, Migrant Workers and Health and Safety. |
| 9.1c Human Rights Due Diligence (remediation) | Conformance | The Entity is committed to the implementation and fulfillment of Human Rights and has policies and procedures in place to handle situations that require remediation. Suppliers are expected to demonstrate compliance with the Supplier Guiding Principles and corrective action is pursued as necessary. Remediation in the case of Human Rights violations is included in Ball Corporation's Human Rights Policy and related policies. The Entity has implemented a policy and procedure for employees to report discrimination, harassment or retaliation to an anonymous ethics hotline. |
| 9.2 Women's Rights | Conformance | Women's rights are integrated into Ball Corporation's Policies on Human Rights, Business |

| CRITERION | RATING | COMMENT |
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| | | Ethics Code of Conduct, Respect in the Workplace and Prohibition of Discrimination. The Entity has an internal Women's Network (BRG), holds bi-monthly educational events, and focuses on developing women in leadership roles. Further information is available at: https://www.ball.com/careers/diversity-inclusion |
| 9.3 Indigenous Peoples | Not Applicable | This Criterion is not applicable as the Entity is not located on or near lands, territories or resources of Indigenous People. |
| 9.4 Free, Prior, and Informed Consent (FPIC) | Not Applicable | This Criterion is not applicable as the Entity is not located on or near lands, territories or resources of Indigenous People. |
| 9.5 Cultural and sacred heritage | Not Applicable | This Criterion is not applicable as the Entity is not located on cultural or sacred heritage sites. The Entity's Due Diligence process for New Projects avoids locations where cultural or sacred heritage sites may be impacted. |
| 9.6a Resettlements (avoid or minimise) | Not Applicable | This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI. |
| 9.6b Resettlements (where unavoidable) | Not Applicable | This Criterion is not applicable as no Resettlements have been considered or taken place during since the Entity was established or since joining ASI. |
| 9.7a Local Communities (rights and interests) | Conformance | The Entity respects the rights and interests of Local Communities and has developed an inclusive and open dialogue with these Communities. |
| 9.7b Local Communities (impacts) | Conformance | The Entity engages with Local Communities when new permits or changes to existing permits are required. |
| 9.7c Local Communities (livelihoods) | Conformance | The Entity engages with Local Communities when new permits or changes to existing permits are required. The Entity awards grants to non-profit organisations in U.S. communities within their Area of Influence. In 2023, the Entity contributed 41% of charitable resources to recycling efforts, 23% to advancing education in STEM, and 30% to helping communities prepare for disaster and rapid relief. Further information is available at: https://www.ball.com/our-company/the-ball-foundation |
| 9.8 Conflict-Affected and High-Risk Areas | Not Applicable | This Criterion is not applicable as the Entity implements the Ball Supplier Guiding Principles and |

| CRITERION | RATING | COMMENT |
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| | | does not source material from Conflicted-Affected and High-Risk Areas. |
| 9.9 Security practice | Conformance | The Entity's Human Rights Policy stipulates that proportionate security arrangements be adopted. The Entity ensures that the provision of security is consistent with local laws and relevant international standards and guidelines. |
| PRINCIPLE 10 LABOUR RIGHTS | | |
| 10.1a Freedom of Association and Right to Collective Bargaining (freedom of association) | Conformance | The Entity has developed a Human Rights Policy that addresses a commitment to respecting Freedom of Association in accordance with national and international laws. |
| 10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining) | Conformance | The Entity has developed a Human Rights Policy that addresses a commitment to respecting the right to Collective Bargaining in accordance with national and international laws. |
| 10.1c Freedom of Association and Right to Collective Bargaining (alternative means) | Conformance | The Entity has developed a Human Rights Policy that addresses a commitment to respecting the right to Collective Bargaining in accordance with national and international laws. |
| 10.2a Child Labour (minimum age) | Conformance | The Entity's Child and Forced Labor Policy is to stringently adhere to all regulations and laws related to Child Labour laws and compulsory or Forced Labour. The Entity does not employ individuals under the age of 18. The Child and Forced Labor Policy is published at: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 10.2b Child Labour (hazardous) | Conformance | The Entity has a 'zero-tolerance policy' on Child Labour. The Child and Forced Labor Policy has been developed to ensure the Entity neither uses nor supports the use of Child Labour in hazardous work areas. |
| 10.2c Child Labour (worst forms) | Conformance | The Entity has a 'zero-tolerance policy' on Child Labour. It has developed a Child and Forced Labor Policy that ensures the Entity neither uses nor supports the use of the Worst Form of Child Labour. |
| 10.3a Forced Labour (human trafficking) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour or Human Trafficking practices, and has the same expectations of businesses within its supply chain. |
| 10.3b Forced Labour (deposits, fees, advances) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour. It neither engages in nor |

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| | | supports the use of Forced Labour nor demands any deposits from its employees. |
| 10.3c Forced Labour (migrant workers) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour. It neither engages in nor supports the use of Forced Labour or uses Migrant Workers. |
| 10.3d Forced Labour (debt bondage) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour. It neither engages in nor supports the use of Forced Labour and does not practice Debt Bondage through advance payment. |
| 10.3e Forced Labour (freedom of movement) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour. It neither engages in nor supports the use of Forced Labour and does not restrict Workers' freedom of movement inside work areas. |
| 10.3f Forced Labour (retention of idEntity papers, permits, certificates) | Conformance | The Entity has a 'zero-tolerance policy' on Forced Labour. It neither engages in nor supports Forced Labour and does not retain employees' original education, training, or identity certificates. |
| 10.3g Forced Labour (freedom to terminate employment) | Conformance | The Entity has a 'zero-tolerance policy' on the use of Forced Labour. It neither engages in nor supports the use of Forced Labour and allows its employees to terminate their contracts with reasonable notice as per the mutually agreed employment contract. |
| 10.4 Non-Discrimination | Conformance | The Entity does not tolerate Discrimination in the workplace and has a Discrimination, Harassment and Retaliation Policy. An ethics compliance hotline is available for anonymous reporting. |
| 10.5 Communication and engagement | Conformance | The Entity supports open communication through the Communication Plan, ethics hotline, and the Prohibition of Discrimination, Harassment, and Retaliation Policy. |
| 10.6 Disciplinary practices | Conformance | The Entity neither engages in nor tolerates the use of corporal punishment, mental or physical coercion, Harassment, and gender-based Violence, including sexual Harassment or verbal abuse of Workers. The Entity's Policies, including the Prohibition of Discrimination, Harassment and Retaliation Policy, Workplace Threats and Violence Policy, Employee Conduct and Discipline Policy and the Code of Conduct, are available to employees on an internal web portal and are included in employee training. |

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| 10.7a Remuneration (living wage) | Conformance | The Entity respects the rights of Workers to a living wage and complies with local, state and federal regulations to ensure that wages paid for a normal working week meet at least legal or industry minimum standards. |
| 10.7b Remuneration (method of payment) | Conformance | The Entity makes timely wage payments, in legal tender and fully documented. |
| 10.8 Working Time | Conformance | Each employee handbook outlines the Entity's Working Time policies, including Overtime pay and distribution. The Entity provides reasonable working hours and fair wages in compliance with local laws and labour contracts where applicable. In addition, each plant posts the 'Federal Labor Wage Poster' in a common area. |
| PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY | | |
| 11.1a Occupational Health and Safety (OH&S) Policy (policy) | Conformance | The Entity has implemented an integrated Ball Global Environmental, Health and Safety (EHS) Policy, and each manufacturing Facility implements site-specific Facility Safety Rules. The EHS Policy is available at: https://www.ball.com/sustainability/sustainability-reporting/downloads |
| 11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors) | Conformance | The Entity has implemented an integrated Ball Global Environmental, Health and Safety (EHS) Policy, and each manufacturing Facility implements site-specific Facility Safety Rules that address Occupational Health and Safety (OH&S) and applies to all Workers and Visitors. |
| 11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards) | Conformance | The Entity identifies four types of compliance obligations within the EHS Management System: Operational (law and regulation related to industrial operations and facilities), Product (legal and customer requirements related to products), Internal (corporate EHS standards), and Voluntary (industry standards and guidelines). |
| 11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work) | Conformance | The Entity has developed a Facility Safety Rules procedure that reaffirms that Workers have the right to understand the hazards and safe practices of their work and the authority to refuse or stop unsafe work. |
| 11.2 OH&S Management System | Conformance | The Entity maintains a structured EHS Management System (EHSMS) equivalent to ISO 14001:2015 Environmental Management Systems and ISO 45001:2018 Occupational Health and Safety Management Systems. The components of |

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| | | the EHSMS are outlined in both the Entity's EHSMS Manual and the Manufacturing Excellence Handbook, and apply to all of the operational locations and include the organisation's policies, procedures, plans, resources, processes, and the delineation of roles and responsibilities, all of which are aimed at achieving products, solutions, and services in a manner consistent with EHS policies and organisational objectives. |
| 11.3 Employee engagement on health and safety | Conformance | The Entity has established processes for employees to participate and provide input specific to environmental or safety concerns. Employees communicate with management via Safety Committee meetings, Plant Safety Team participation, suggestion boxes, and regular shift meetings. |
| 11.4 OH&S performance | Conformance | The Entity monitors and measures its EHS performance and publishes a monthly EHS Scorecard. Each Facility highlights leading and lagging metrics and implements corrective action plans as required. |

Document Control and Version History

| Revision | Date | Notes |
|----------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 0 | 9 March 2022 | Initial Certification Audit – Full Certification |
| 1 | 25 February 2025 | Surveillance Audit and Scope Change Scope Change to remove Kent, Phoenix, St. Paul and Wallkill sites. Extension to Audit Expire date granted for three months. |