

# ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

# CROWN BEVCAN AND CLOSURES (THAILAND) CO., LTD.

CERTIFICATE  
NUMBER

286

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

CETIZION  
VERIFICA

DATE OF ISSUE

22 MAY 2023

DATE OF EXPIRY

21 MAY 2026

CERTIFIED SINCE

22 MAY 2023

AUTHORISED BY

A stylized signature in black ink.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
[info@aluminium-stewardship.org](mailto: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](http://www.aluminium-stewardship.org)*

CERTIFICATION SCOPE

Manufacture of two-piece aluminium cans for use  
in Beverage Industry (Thailand).

# SUMMARY AUDIT REPORT

## PERFORMANCE

## STANDARD

### OVERVIEW

MEMBER NAME	Crown Holdings, Inc.
ENTITY NAME	Crown Bevcan and Closures (Thailand) Co., Ltd.
CERTIFICATION SCOPE	Manufacture of two-piece aluminium cans for use in Beverage Industry (Thailand).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (6 – 9 February 2023)</li><li>Surveillance Audit (14 – 16 November 2024)</li></ul>
AUDIT FIRM	Cetizion Verifica
AUDIT DATE	<ul style="list-style-type: none"><li>6 – 9 February 2023 (Initial Certification Audit)</li><li>14 – 16 November 2024 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>1 May 2023 (Initial Certification Audit)</li><li>21 March 2025 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (6 – 9 February 2023)</u></p> <p>The Audit Scope covers regional managing activities at Asia Pacific Division office and Two-piece Aluminium Beverage Cans Manufacturing in CROWN Bevcan and Closures (Thailand) Co., Ltd.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All criteria in the ASI Performance Standard were included in the Audit Scope.</p> <p><u>Surveillance Audit (14 – 16 November 2024)</u></p> <p>The Audit Scope covers regional managing activities at Asia Pacific Division office and Two-piece Aluminium Beverage Cans Manufacturing in CROWN Bevcan and Closures (Thailand) Co., Ltd.</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul>

	All criteria in the ASI Performance Standard were included in the Audit Scope.
AUDIT OUTCOME	<ul style="list-style-type: none"> <li>• Certification</li> </ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li> <li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li> <li><input checked="" type="checkbox"/> The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.</li> <li><input checked="" type="checkbox"/> The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.</li> </ul>
CERTIFICATION PERIOD	22 May 2023 – 21 May 2026
NEXT AUDIT TYPE	Re-Certification Audit
NEXT AUDIT DATE	21 May 2026
CERTIFICATION NUMBER	286

## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>The Entity has identified Applicable Law along with detailed requirements, and assigned responsible functions (e.g., Human Resources is responsible for the Labour Protection Act 2541).</p> <p>There is annual planning for mandatory reporting of legal compliances to concerned Government authorities. For example,</p> <ul style="list-style-type: none"> <li>a. stock emission twice a year</li> <li>b. Employment condition and contract reporting by 31st January each year, on the Government website <a href="https://lb.mol.go.th/en">https://lb.mol.go.th/en</a>.</li> </ul> <p>The related topics training is provided to employees e.g., labour rights are covered in an employee handbook given to each employee at the time of joining.</p>
1.2 Anti-Corruption	Conformance	<p>The Entity has developed an anti-Corruption policy: <a href="https://www.crowncork.com/investors/policies/code-business-conduct-and-ethics">https://www.crowncork.com/investors/policies/code-business-conduct-and-ethics</a></p> <p>Employees are trained and tested on anti-Corruption and the senior management team commits to the anti-Corruption declaration: <a href="https://www.crowncork.com/sites/files/2022-10/Anti-Corruption-Anti-Money-Laundering-Certifications.pdf">https://www.crowncork.com/sites/files/2022-10/Anti-Corruption-Anti-Money-Laundering-Certifications.pdf</a></p> <p>An anti-Corruption risk assessment has been undertaken, which considers the local situation in Thailand. For each major function, Corruption risks have been identified with required mitigation measures and residual risk.</p>
1.3 Code of Conduct	Conformance	<p>The Entity has implemented the Crown Code of Conduct: <a href="https://www.crowncork.com/sites/files/2022-03/Code-of-Business-Conduct-2.02.22-FINAL.pdf">https://www.crowncork.com/sites/files/2022-03/Code-of-Business-Conduct-2.02.22-FINAL.pdf</a></p> <p>Employees are trained and tested. Periodic refresher training is delivered on any changes made to the Code of Conduct.</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>The Entity adheres to the following Crown environment, social and governance (ESG) Policies:</p> <p>Governance Guidelines: <a href="https://www.crowncork.com/investors/governance/corporate-governance-guidelines">https://www.crowncork.com/investors/governance/corporate-governance-guidelines</a></p> <p>Environment, Health and Safety Policy: <a href="https://www.crowncork.com/sites/files/2022-03/EHSPolicy_2021_English_Signed.pdf">https://www.crowncork.com/sites/files/2022-03/EHSPolicy_2021_English_Signed.pdf</a></p> <p>Additionally, the Entity has implemented an Environment, Health and Safety Policy developed at the plant level in accordance with corporate guidelines.</p>

CRITERION	RATING	COMMENT
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The various ESG Policies are endorsed and supported by the Entity's senior management through the provision of resources and regular review of the Policies' implementation status.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The ESG Policies are communicated through display, training, and on the website for both internal and external Stakeholders: <a href="https://www.crowncork.com/investors/governance/corporate-governance-guidelines">https://www.crowncork.com/investors/governance/corporate-governance-guidelines</a>
2.2 Leadership	Conformance	The Entity has established an ASI governance team and appointed a Management Representative.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has implemented a documented environment Management System in accordance with regional/corporate guidelines. Periodic monitoring is undertaken at the Entity and by the regional team. There is good practice to identify and work towards sector-specific topics such as heat stress in the workplace.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has implemented a documented social Management System in accordance with regional/corporate guidelines. Periodic monitoring of social performance is undertaken at the Entity and by the regional team. The Entity has undergone external social audits such as SMETA, since the previous ASI Audit.
2.4 Responsible Sourcing	Conformance	<p>The Entity has implemented the Crown Supplier Code of Conduct: <a href="https://www.crowncork.com/sites/files/2022-03/code-conduct-english.pdf">https://www.crowncork.com/sites/files/2022-03/code-conduct-english.pdf</a></p> <p>The Supplier Code of Conduct has been communicated to suppliers and acknowledged. Purchase orders issued to suppliers include reference to Crown's responsible sourcing-related policies and binding terms and conditions. Further information is available at: <a href="https://www.crowncork.com/investors/policies/supplier-code-conduct">https://www.crowncork.com/investors/policies/supplier-code-conduct</a></p> <p>The Entity has implemented the Crown Responsible and Ethical Sourcing Policy, which includes 2025 and 2030 targets and progress against the targets is reviewed at the corporate level in a consolidated manner: <a href="https://www.crowncork.com/investors/policies/responsible-and-ethical-sourcing-policy">https://www.crowncork.com/investors/policies/responsible-and-ethical-sourcing-policy</a></p> <p>The Entity has disclosed information on its responsible sourcing activities in the 2023 Sustainability Report, pages 27, 54 and 55: <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a></p> <p>The Supplier Code of Conduct is incorporated as part of</p>

CRITERION	RATING	COMMENT
		<p>vendor onboarding. The Aluminium supplier is being managed by the Entity's regional APAC sourcing team. The Supplier Code of Conduct is available at: <a href="https://www.crowncork.com/sites/default/files/2022-03/code-conduct-english.pdf">https://www.crowncork.com/sites/default/files/2022-03/code-conduct-english.pdf</a></p> <p>Additionally, there is a documented procedure that now includes Conflict-Affected and High-Risk Areas (CAHRAs) considerations.</p>
2.5 Impact Assessments	Conformance	<p>The Entity as part of global practice considers ESG related risks and impacts in project evaluation and selection. There is a site evaluation checklist covering new sites as well as expansion, which addresses topics related to the environment, social and community.</p>
2.6 Emergency Response Plan	Conformance	<p>The Entity has a documented emergency response plan that identifies possible emergency scenarios such as fire and gas leakage. The Entity has reviewed and updated the emergency plan, which was approved by cross-functional team/managers.</p> <p>Training on emergency preparedness and response is provided to employees, and periodic drills are conducted to validate emergency preparedness.</p>
2.7 Mergers and Acquisitions	Conformance	<p>The Entity has implemented corporate level guidelines for mergers and acquisitions, which address the relevance of ESG and considerations during the Due Diligence process as part of mergers and acquisitions. No merger or acquisition has affected the Entity over the past years.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>The Entity has implemented the corporate level guidelines for closure, decommissioning and divestment, which address the relevance of ESG issues and their consideration during the closure, decommissioning and divestment activities. No closure, decommissioning or divestment has affected the Entity over the past years.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>The Entity has developed and disclosed its Sustainability Reports through the Crown corporate reporting function, Entity level references are included in the 2023 Sustainability Report, pages 17, 27, 37 and 43: <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a></p>
3.2 Non-compliance and liabilities	Conformance	<p>The Entity has no significant fines, judgments, penalties and non-monetary sanctions for failure to comply with Applicable Law. Where these occur, it would be disclosed in the corporate sustainability reporting. The Entity undertakes periodic public disclosures e.g., to local government authorities.</p>

CRITERION	RATING	COMMENT
3.3a Payments to governments (legal and contractual)	Conformance	The Entity only paid legitimate payment such as license fees and taxes. There are no political contributions in-kind or financially made by the Entity.
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	<p>The Entity has a functional Stakeholder engagement and grievance handling system, managed by a third party: <a href="https://www.crowncork.com/investors/policies/whistleblowing-and-business-ethics-hotline-policy">https://www.crowncork.com/investors/policies/whistleblowing-and-business-ethics-hotline-policy</a></p> <p>There were no Stakeholder complaints, grievances or requests for information since the previous ASI Audit as per document review and consultation with responsible employees.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has evaluated the life cycle impacts of its major Product lines. Information on the product Life Cycle Assessment (LCA) and product recovery is available at: <a href="https://www.crowncork.com/sustainability/environment/product-life-cycle">https://www.crowncork.com/sustainability/environment/product-life-cycle</a></p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>The LCA methodology has considered a cradle-to-grave approach, as per ISO 14040:2006, which includes the extraction of Bauxite ore and ends with the recycling and recovery of Used Beverage Cans (UBC). Reasoning for excluding transport and distribution is indicated within the assessment. The Entity provides the LCA to customers on request in addition to the executive summary. The executive summary of LCA results is used for communication with interested customers.</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>The Entity has developed the executive summary of LCA results containing all relevant information such as the methodology, standards/tools used, boundary, results and being used for communication with interested customers. At the corporate level, the Crown's global approach towards product LCA is available at: <a href="https://www.crowncork.com/sustainability/environment/product-life-cycle">https://www.crowncork.com/sustainability/environment/product-life-cycle</a></p>
4.2 Product design	Conformance	<p>The Entity has implemented processes to review and improve product and process design for resource efficiency. Some of the actions include downgauging, and a global commitment to avoid or reduce all perfluorinated chemicals.</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>The Entity has established targets for the reduction of Aluminium Process Scrap (spoilage), which is monitored by management. 100% of process scrap is collected according</p>

CRITERION	RATING	COMMENT
		to material grade and processed through a baler to compress it into a block and send it to a scrap collector for recycling.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	Aluminium Process Scrap is collected according to material grade and processed through a baler to compress into a block and send to scrap collector for recycling.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	The Entity has developed a recycling strategy and is working on a multi-Stakeholder project to analyse the current Aluminium recycling rate in Thailand. The Entity is also a member of the Thailand Institute of Packaging and Recycling Management for Sustainable Environment (TIPMSE) and actively participates in promoting the collection and recycling of products at End of Life.
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity is working closely with Non-Government Organisations (NGOs) and educational institutions through providing recycling bins at schools, teaching the benefits of recycling and the concept of circularity. The foreseen challenges the Entity has identified include re-melting, coil manufacturing and integration with existing similar initiatives such as 'Aluminium Loop' ( <a href="https://aluminiumloop.com/en">https://aluminiumloop.com/en</a> ). At a corporate level, the Entity is working with the International Aluminium Initiative (IAI) and is part of the Global Beverage Can Circularity Alliance (GBCCA) with a target recycling rate of 80% by 2030 and 100% by 2050.

#### PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Minor Non-Conformance	The Entity complies with corporate practices and has collected and reported Greenhouse Gases (GHG) emissions data through Crown's digital tool. Scope 1 and Scope 2 GHG emissions are amalgamated at the corporate level and reported in the 2023 Sustainability Report, page 11: <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a> However, there is no documented procedure at the Entity level to explain the methodology used for determining Material GHG emissions, and emissions factors. An additional quality check for data accuracy noted some inconsistencies.
5.2 GHG emissions reductions	Conformance	The Entity has implemented a plant-level GHG emissions reduction plan that is in line with the corporate 'Twentyby30' goals. The goals and performance are disclosed in the 2023 Sustainability Report, pages 7 and 11: <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a>



CRITERION	RATING	COMMENT
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	<p>The Entity holds a valid permit for its operations within the industrial estate. Emission monitoring has been conducted by a third party for stack emissions and workplace air quality.</p> <p>The Entity has conducted an environmental risk assessment covering emissions from stack vents. Control measures are implemented, and monitoring is undertaken every six months, with emission data reported externally to the Nong Khae Industrial Authority.</p>
6.2 Discharges to Water	Conformance	<p>The Entity has dedicated drains and channels to collect process (washer) wastewater and undertake primary treatment (neutralisation). Subsequently, this primary treated water is sent to a central wastewater treatment plant operated by the industrial park authority. A sample is collected monthly by an externally approved agency to test key wastewater parameters. All tested parameters are within permissible limits. The Entity has implemented actions to further reduce wastewater generation and re-use the primary treated wastewater for alternative applications such as toilet flushing.</p>
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	<p>The Entity has conducted a Spills and Leakage risk assessment for chemicals and wastewater. Training is provided, and practice drills are conducted periodically to check implementation effectiveness. No Spills or Leakages were noted during the Audit site walkthrough.</p>
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	<p>The Entity conducts daily and monthly checks of chemical storage conditions including spillage conditions and availability of spill kits.</p>
6.4a Reporting of Spills (immediate disclosure)	Conformance	<p>The Entity has implemented practices to internally report Spills in the 'Velocity EHS' tool. Spills that impact the local/municipal drain are reported to the regional Crown team.</p> <p>As per Thai regulation, any Spills that affect the vicinity must be reported to authorities and affected Stakeholders. There have been no Spills in the past years.</p>

CRITERION	RATING	COMMENT
6.4b Reporting of Spills (regular reporting)	Conformance	There were no Spills and Leakages noted during the Audit site walkthrough. Any Spills that impact the local/municipal drain are required to be reported to the regional Crown team. As per Thai regulations, any Spills that affect the vicinity must be reported to authorities and affected Stakeholders. There have been no such Spills since the previous ASI Audit.
6.5a Waste management and reporting (strategy)	Conformance	<p>The Entity has mapped the different types of Hazardous Waste and Non-Hazardous Waste generated with the different areas and activities including office, production, outside production building (wastewater treatment plant), and logistics. The Entity has a waste management plan with waste reduction targets that support global targets and has implemented actions such as redirecting the disposal of primary treatment sludge from landfill to alternative reuse applications.</p> <p>The Entity reports monthly to the local Government on waste generated and disposed of by a designated agency. The Entity is working towards 'Zero Waste to Landfill' status, in line with the corporate goals as disclosed in the 2023 Sustainability Report, page 16:  <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a></p>
6.5b Waste management and reporting (disclosure)	Conformance	<p>All waste types and quantities are reported and disclosed on an annual basis in the corporate Sustainability Report:  <a href="https://www.crowncork.com/sustainability/reporting/all-reports">https://www.crowncork.com/sustainability/reporting/all-reports</a></p> <p>The Entity reports both monthly and annually to the industrial state governor/authority indicating all types and quantities of waste disposed of.</p>
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.

CRITERION	RATING	COMMENT
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		
7.1a Water assessment (mapping)	Conformance	The Entity has prepared a water flow diagram indicating the quantity of water consumed at major stages. The Entity uses the Aqueduct Water Risk Atlas tool to assess water risk. Surface water is sourced by the industrial park authority from the nearby Rapheepat Canal, it is pre-treated and supplied to industrial park occupants including the Entity.
7.1b Water assessment (risk assessment)	Conformance	The Entity uses the Aqueduct Water Risk Atlas tool to assess water risk in the Watershed. An assessment has also been conducted by a third party to determine the water-related risks in the Watershed within the Entity's Area of Influence. The Entity has also developed detailed water assessments analysing input, consumption and output water streams, as well as water saving projects.
7.2a Water management (management plans)	Conformance	The Entity has developed a water management plan that addresses water metering, usage monitoring, leakage control measures as well as water saving projects.
7.2b Water management (monitoring)	Conformance	Water consumption per million cans is monitored by the Entity monthly. There is a regional as well as Entity level water roadmap to 2030 in line with the corporate 'Twentyby30' goals i.e., 100% water replenishment by 2030 for water stress areas.

CRITERION	RATING	COMMENT
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has implemented systems and practices to monitor, analyse and report water usage internally as well as to external Stakeholders through various means such as corporate level sustainability reports, and statutory reporting to the industrial park authority. The Entity has established a water task force to improve water resource efficiency as part of management's commitment towards water-related issues.</p> <p>The Entity has reported its water usage and risk through the 2023 Sustainability Report, pages 13-15:  <a href="https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf">https://www.crowncork.com/sites/default/files/2024-07/Crown_Sustainability_Report_2023.pdf</a></p>
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	<p>The Entity has undertaken an on-site detailed biodiversity assessment addressing the on-site area and buffer zone to identify and assess Biodiversity aspects such as flora and fauna, the presence of Protected Areas, World Heritage sites and IUCN Red List species.</p>
8.2a Biodiversity management (biodiversity action plans)	Conformance	<p>The Entity has a documented biodiversity management plan based on the outcome of the biodiversity risk assessment as well as the corporate 'Twenty by 30' goals. There is no Material risk and/or impact has been identified as part of the biodiversity risk assessment. Training is provided to employees responsible for the implementation of the biodiversity management plan. The Entity has supported a tree plantation program with the industrial area authority. The corporate level biodiversity plans are publicly available at:  <a href="https://www.crowncork.com/sustainability/environment/biodiversity">https://www.crowncork.com/sustainability/environment/biodiversity</a></p> <p>There is a documented Biodiversity management plan for each unit/area specifically based on recommendations for improvement and to fulfil ambitions of corporate 'Twenty by 30' goals.</p> <p>The Entity has taken necessary actions as part of the biodiversity management plan including employee awareness, and native tree plantation, and was checked during the factory visit. The Entity has received a 'Green Star' award for its biodiversity initiatives.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Conformance	<p>The Entity has developed a biodiversity management plan in consultation with employees and external Stakeholders and their perspectives, and inputs have been incorporated.</p>
8.2c Biodiversity management (reporting)	Conformance	<p>The corporate level biodiversity plans are publicly available at:  <a href="https://www.crowncork.com/sustainability/environment/biodiversity">https://www.crowncork.com/sustainability/environment/biodiversity</a></p>

CRITERION	RATING	COMMENT
8.3 Alien Species	Conformance	<p>The Entity has conducted a risk assessment and control measures are documented to prevent the introduction of Alien Species and remediate areas affected by Alien Species.</p> <p>There were no invasive species were recorded inside the on-site zone in the biodiversity risk assessment. However, two invasive species <i>Ipomoea obscura</i> and <i>Lantana camara</i> were recorded within the buffer zone.</p>
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	<p>The Entity last updated its Human Rights Policy in April 2024, and is made available on the website and in the Thai language:</p> <p><a href="https://www.crowncork.com/sites/default/files/2024-04/HumanRights24_English_a.pdf">https://www.crowncork.com/sites/default/files/2024-04/HumanRights24_English_a.pdf</a></p> <p><a href="https://www.crowncork.com/sites/default/files/2024-04/HumanRights24_TH.pdf">https://www.crowncork.com/sites/default/files/2024-04/HumanRights24_TH.pdf</a></p> <p>The Entity’s global Human Rights Policy, refers to the UN Guiding Principles on Business and Human Rights and the UN Universal Declaration on Human Rights.</p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has developed a Human Rights Due Diligence document addressing employees, women, Indigenous Peoples, migrant Workers, third party contractors and its supply chain. The Human Rights Due Diligence is conducted following a systematic approach (i.e. mapping, analysis, assessment criteria and action plan).</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>The Entity has available a complaints mechanism that can be accessed (via an app, QR code or toll-free telephone number) for complaints on Human Rights impacts. The ethics hotline is available at:</p> <p><a href="https://www.crowncork.com/investors/policies/whistleblowing-and-business-ethics-hotline-policy">https://www.crowncork.com/investors/policies/whistleblowing-and-business-ethics-hotline-policy</a></p> <p>The responsibility to handle any complaints is defined, and to date, no complaints have been received.</p>

CRITERION	RATING	COMMENT
		Operation-level grievances are handled through the employee's welfare committee.
9.2 Women's Rights	Conformance	<p>The Entity promotes gender diversity and inclusion and implements the global commitment to diversity and inclusion:</p> <p><a href="https://www.crowncork.com/sustainability/social/diversity-inclusion">https://www.crowncork.com/sustainability/social/diversity-inclusion</a></p> <p>There are women representatives in the employees' welfare committee and other governance committees.</p>
9.3 Indigenous Peoples	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples in the Entity's Area of Influence. There are nine "hill tribes" officially recognised but none are present in the area.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This Criterion is not applicable, as there are no Indigenous Peoples whose land is used by the Entity and thus FPIC is not applicable.
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable, as there are no cultural and sacred heritage sites or values within a 10 kilometre area. However, heritage is included in the checklist for new plant projects.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable, as the Entity is operating in a government managed industrial park. There is no resettlement caused due to the establishment of business activities by the Entity.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable, as the Entity is operating in a government managed industrial park. There is no resettlement caused due to the establishment of business activities by the Entity.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of Local Communities in their lands and livelihoods and their use of natural resources. There is a Local Community outside the industrial area, and many of the employees live nearby thus providing employment opportunities. There are sixteen villages altogether. The Entity undertakes Corporate Social Responsibility (CSR) activities. It was confirmed during community interviews that there is a good relationship with the Entity and there were no complaints by the Local Community regarding environmental impacts.
9.7b Local Communities (impacts)	Conformance	<p>The Entity has taken appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities.</p> <p>The Entity works closely with affected Stakeholders</p>

CRITERION	RATING	COMMENT
		including villages/communities, Nong Khae Industrial Estate Authority and Local Government, as discussed during external Stakeholder consultations. Other activities include provision of school supplies, medical devices provided to the Nong Khae Government Hospital, blood donations support and tree planting initiatives.
9.7c Local Communities (livelihoods)	Conformance	The Entity has undertaken various activities to support the livelihoods of Local Communities, many of the employees belonging to Local Communities.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has implemented the Crown Conflict Minerals Policy and is communicated to suppliers: <a href="https://www.crowncork.com/investors/policies/conflict-minerals-policy">https://www.crowncork.com/investors/policies/conflict-minerals-policy</a> There are no conflict minerals used as part of business activities. Conflict-Affected and High-Risk Areas (CAHRAs) are addressed through the Responsible and Ethical Sourcing Policy and the Supplier Code of Conduct. <a href="https://www.crowncork.com/sites/files/2022-03/responsible-ethical-sourcing-policy.pdf">https://www.crowncork.com/sites/files/2022-03/responsible-ethical-sourcing-policy.pdf</a> and <a href="https://www.crowncork.com/sites/files/2022-03/code-conduct-english.pdf">https://www.crowncork.com/sites/files/2022-03/code-conduct-english.pdf</a>
9.9 Security practice	Conformance	Security practices are included in the Entity's Human Rights risk assessment. The security guards are from external agencies. Interviews with security personnel confirmed conformance with applicable requirements. The security guards' practices adhere to the principles of Human Rights.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Freedom of Association and the right to Collective Bargaining is addressed in the Entity's Human Rights Policy: <a href="https://www.crowncork.com/investors/policies/human-rights-policy">https://www.crowncork.com/investors/policies/human-rights-policy</a> The new welfare committee is composed of both men and women elected, the process was conducted under independent supervision, and formally communicated to the Provincial Labour Office of Saraburi Province. Related records are maintained such as meeting minutes and were checked during the plant visit (notice board) and during Workers' interviews.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Freedom of Association and the right to Collective Bargaining is addressed in the Human Rights Policy, which commits the Entity to respect the rights of Workers to Collective Bargaining and participate in any Collective Bargaining process in good faith to the extent possible



CRITERION	RATING	COMMENT
		under Applicable Law. There is no Collective Bargaining agreement at the Entity. <a href="https://www.crowncork.com/investors/policies/human-rights-policy">https://www.crowncork.com/investors/policies/human-rights-policy</a>
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	The Criterion is not applicable, as the right to Freedom of Association and Collective Bargaining is not restricted by labour laws in Thailand.
10.2a Child Labour (minimum age)	Conformance	Child Labour is addressed in the Human Rights Policy: <a href="https://www.crowncork.com/investors/policies/human-rights-policy">https://www.crowncork.com/investors/policies/human-rights-policy</a> Child Labour is also part of the Human Rights Due Diligence. The Entity verifies the age of Workers during the hiring process, and this is recorded as part of employment records.
10.2b Child Labour (hazardous)	Conformance	The Entity does not engage in or support Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	The Entity does not engage in or support the Worst Forms of Child Labour in its business activities.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in or support Human Trafficking either directly or through any employment or recruitment agencies.
10.3b Forced Labour (deposits, fees, advances)	Conformance	Forced Labour is addressed in the Human Rights Policy: <a href="https://www.crowncork.com/investors/policies/human-rights-policy">https://www.crowncork.com/investors/policies/human-rights-policy</a> Forced Labour is also part of the Human Rights Due Diligence. There is no practice of keeping original documents, financial security or other means leading to Forced Labour.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time during the employment period.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work in order to pay off a debt.
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain any original copies of Workers' identity papers, work permits, travel documents or training certificates.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice



CRITERION	RATING	COMMENT
		of reasonable length as mentioned in the employment contract.
10.4 Non-Discrimination	Conformance	<p>There is no Discrimination in hiring, training, and promotion e.g., Hiring: interviews conducted by more than one person. Training needs are identified and provided as per the competency matrix. The Entity is open to employing personnel from minority communities. Discrimination is also addressed in the Crown Human Rights Policy:</p> <p><a href="https://www.crowncork.com/investors/policies/human-rights-policy">https://www.crowncork.com/investors/policies/human-rights-policy</a></p>
10.5 Communication and engagement	Conformance	The Entity has established a communication procedure detailing various channels of communication, related topics, and functional responsibility. Town hall meetings occur each quarter which are facilitated by the Area General Manager.
10.6 Disciplinary practices	Conformance	The Entity has established disciplinary rules, detailed in the employee handbook that prohibits corporal punishment, mental or physical coercion, harassment, and gender-based violence including sexual harassment, or verbal abuse of Workers. Disciplinary rules are also addressed during employee induction training. Workers understand the disciplinary rules, as confirmed during interviews.
10.7a Remuneration (living wage)	Conformance	The Entity compiled a salary survey using government statistical data as well as an employee survey to estimate the living wage. The minimum wage paid by the Entity is above the mandatory minimum wage plus it also provides an additional cost of living allowance.
10.7b Remuneration (method of payment)	Conformance	The Entity pays wages above the legal minimum wage. Salaries are paid on the 25 <sup>th</sup> of each month via bank transfer. A salary slip is distributed one day before payment and details income, working hours, social security deductions, and allowances. The Entity shares information every June and December to inform employees about the status of their social security deposits.
10.8 Working Time	Minor Non-Conformance	<p>Working hours are recorded through a biometric attendance system. The Entity monitors working hours and Overtime using statistical tools such as run charts. Working hours and Overtime premium payments are detailed in the employee handbook.</p> <p>It was identified that some employees' working hours exceed the legal Overtime limit of 36 hours per week as per Thai Labour Laws (BE 2541). The Entity has developed a corrective action plan for the non-conformance and improvements have been made during recent months.</p>

CRITERION	RATING	COMMENT
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	<p>The Entity has implemented Crown's global Environment, Health and Safety (EHS) Policy:  <a href="https://www.crowncork.com/investors/policies/environment-health-and-safety-policy">https://www.crowncork.com/investors/policies/environment-health-and-safety-policy</a></p> <p>Training and communication on the EHS Policy are provided to employees and Visitors. Senior management has endorsed the Policy and provided the necessary commitment and resources to implement its provisions.</p>
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The EHS Policy has been developed to apply to all Workers and Visitors present in any area or activities under the Entity's control.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	The EHS Policy has been developed with a commitment to comply with Applicable Law on Workers' health and safety, international standards, and ILO Conventions on Occupational Health and Safety.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The EHS Policy has been developed and addresses the right of Workers to understand the hazards and safe practices for their work, and the authority to refuse or stop unsafe work.
11.2 OH&S Management System	Minor Non-Conformance	<p>The Entity has implemented a documented Occupational Health and Safety (OH&amp;S) Management System that includes standard operating procedures, OH&amp;S training and procedures on work permits, lock out-tag out, personnel hygiene control programs, and allergen control programs. A first aid room is provided and accessible to Workers.</p> <p>The Entity's OH&amp;S Management System has identified some weaknesses in its implementation, as detailed below:</p> <ul style="list-style-type: none"> <li>- workplace heat stress test results do not comply with applicable standards</li> <li>- no proper use of PPE and the fume extraction system during the ink mixing process</li> <li>- the bailing press safety interlock was found to be ineffective.</li> </ul>
11.3 Employee engagement on health and safety	Conformance	<p>There are monthly workplace safety committee meetings held to discuss and engage employees on safety topics. The Entity manages a visual display on safety topics to inform and engage employees, and Visitors on safety issues. Rewards and recognition are provided to employees to promote and encourage safe behaviour.</p>
11.4 OH&S performance	Conformance	<p>The Entity reports OH&amp;S data within the internal enterprise resource planning (ERP) tool. Data is extracted every month for the Crown global primary balanced safety scorecard and linked with performance management. Parameters include site internal audit scores, Asia Pacific (AP) regional site audits and others.</p>

**Document Control and Version History**

Revision	Date	Notes
0	22 May 2023	Initial Certification Audit - Full Certification
1	11 April 2025	Surveillance Audit