

Modern Slavery Statement

This Modern Slavery Statement is made in accordance with section 54 of the United Kingdom Modern Slavery Act 2015 and section 14 of the Australian *Modern Slavery Act 2018* (Cth). It is made as a joint statement of Amcor plc, Amcor Pty Ltd, Amcor Flexibles Group Pty Ltd, and Amcor Flexibles (Australia) Pty Ltd (collectively referred to as “**Amcor**” or the “**reporting entities**”) for the year ended 30 June 2022.

Amcor’s structure, operations and supply chains

Structure

Amcor plc is a company incorporated in the Bailiwick of Jersey and is listed on the New York Stock Exchange, with CHESSE Depository Interests listed on the Australian Securities Exchange. Amcor plc has around 275 subsidiaries in 57 jurisdictions, including Australia, New Zealand, Europe, USA, Latin America, Asia, and Africa (**Amcor Group**). Amcor Group employs around 44,000 employees and has its corporate head office located in Switzerland with additional corporate offices in Australia, USA and Singapore. Companies in the Amcor Group share central governance and legal functions, regional procurement functions as well as policies and procedures set by Amcor plc.

The reporting entities comprising Amcor are companies incorporated in Australia, with the exception of Amcor plc. Amcor Flexibles (Australia) Pty Ltd is focused on the manufacture and sale of Amcor Group products in Australia, with the remaining reporting entities being focused on providing ancillary support services to entities within the Amcor Group.

Operations

Amcor Group is a global leader in developing and producing responsible packaging solutions for food, beverage, pharmaceutical, medical, home and personal-care, and other products. Amcor Group works with leading companies around the world to protect their products and the people who rely on them, differentiate brands, and improve supply chains through a range of flexible and rigid packaging, specialty cartons, closures, and related services.

Amcor Group’s manufacturing facilities are located in Europe, USA, Latin America, Asia Pacific, and Africa. Amcor’s operations in Australia are supported by the Amcor Group’s centralised R&D activities, and local and regional distribution, purchasing, marketing and sales activities. In fiscal year 2022, Amcor Group generated US\$15 billion in annual sales from operations that spanned 220 locations in 43 countries.

Supply Chain

With over 32,000 suppliers around the world, the Amcor Group relies on an extensive global supply chain. Goods and services are procured by the Amcor Group from a broad range of suppliers in many jurisdictions. In the case of its Australian operations, Amcor’s supply chain consists of over 350 local suppliers, in addition to international suppliers from New Zealand, Indonesia, India, Thailand, Vietnam, China, USA, and Europe.

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Amcor Group's procurement team engages suppliers of all sizes in accordance with its group-wide procurement guidelines. Our suppliers are categorised as strategic, critical, core and other suppliers based on spend, size, and strategic importance to the Amcor Group. Procurement is managed by the Procurement team in each region according to a formalised process. In the case of Amcor's Australian operations, the regional Procurement team primarily manages or approves the procurement of goods and services directly. Goods and services of low value may be purchased without involvement of the Procurement team, provided relevant guidelines are followed.

Amcor procures goods and services used:

- in the manufacturing of packaging, including resin, film, inks, adhesives, solvents, foil and paper; and
- to support its operations, including logistics, pre-press materials, machinery, maintenance, repairs and operations, personal protective equipment and uniforms, IT and professional services, and facilities management.

Modern slavery risks in Amcor Group's operations and supply chains

The Amcor Group strongly values its suppliers as key partners in ensuring the quality of its products and the smooth functioning of its operations. But we also recognise the supply chain is a potential source of environmental, labour, and human rights risk and we have adopted the processes and procedures described below to identify and mitigate those potential risks.

We have considered the extent to which we may contribute to, cause or be linked to modern slavery risks in our operations and supply chain. Though the packaging industry's supply chain is less susceptible to social issues such as child labor and forced or compulsory labor than many other industries, we continue to remain proactive in protecting ourselves, our customers, and our communities. Our human resources processes and policies are designed to ensure our team members are paid fairly, in compliance with applicable labour laws and treated fairly with dignity and respect. Health and safety is a core value of the Amcor Group. We champion a safe work environment and safe and responsible behaviours among all employees, guided by our robust Environmental Health and Safety program. All manufacturing, warehouse, and office sites are subject to global standards for safety and environmental management.

Recognising the level of control we exercise over our operations, including our risk management and compliance systems, we consider that relevant risk exposures reside principally in our supply chain, rather than in our operations. Using Amcor's Australian operations as an example, we view potential areas of risk in the supply chain as follows:

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- *Facilities management suppliers:* use of child labour and/or illegal migrant workers to potentially manage costs as well as business demand variation.
- *Personal protective equipment and uniform suppliers:* use of child labour, servitude and/or forced labour in the textile industry that produces both upstream material as well as finished goods. Such items include uniforms, gloves, protective glasses, protective hats and ear plugs.
- *Ocean freight suppliers:* use of low-cost country labour at shipping ports of despatch, as well as labour onboard cargo ships, may present a risk of forced labour and debt bondage, where the economic circumstances and unskilled labour from low-cost countries may be exploited. Appointed shippers can also reassign cargo to other freighters to assist in efficient container routing and this results in loss of direct control of practices for goods imported into Australia potentially adding to this risk.
- *Local transportation suppliers:* use by transport and/or warehouse operators of child labour and/or illegal migrant workers to reduce costs and in response to variations in business demand.
- *Waste management/processing:* use of child labour and/or forced labour particularly as it pertains to mechanically and/or chemically recycled post-consumer and post-industrial waste for the production of recycled materials.

Actions taken to assess and address modern slavery risks

The Amcor Group has a framework in place to assess and address modern slavery risks in its operations and supply chains (and which applies in respect of the reporting entities). Forming part of that framework are our due diligence and remediation processes, and policies that underpin those processes.

Due diligence processes

The following are key elements in Amcor Group's effort to prevent modern slavery in its operations and supply chains:

- Supplier Code of Conduct (Supplier Code): Amcor Group's suppliers are required to comply with the principles outlined in its Supplier Code. To comply, suppliers are required to sign the Supplier Code, or demonstrate they have an equivalent code in place. The Supplier Code covers the areas of business integrity, labour standards, occupational health, and environmental management and improvement. More specifically, the Supplier Code addresses child labour, forced labour, working hours, compensation and freedom from harassment. The Supplier Code sets out that under no circumstances may a supplier use or benefit from forced labour or utilise factories or production facilities that force work to be performed by unpaid or indentured labourers. It also provides that the use of child labour is strictly prohibited.

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We aim for 100% of strategic and critical suppliers to sign the Supplier Code or demonstrate they have an equivalent code in place. In the financial year ending on 30 June 2022, the Amcor Group achieved this aim.

- **EcoVadis:** EcoVadis is a platform for corporate social responsibility (CSR) assessment, monitoring, and performance improvement. The Amcor Group completes an annual EcoVadis assessment of its operations at a global level. EcoVadis is also used to assess and manage many of our largest suppliers. These assessments evaluate how well a supplier has integrated the principles of CSR into its business and management systems and suggest areas for continued improvements. Our customers use these assessments to better understand and manage their supply chain risk.

The Amcor Group requests all of its strategic and critical suppliers to complete assessments through the EcoVadis global supply chain sustainability rating platform. EcoVadis helps us evaluate these suppliers' performance in the areas of environment, labor practices and human rights, fair business practices, and procurement sustainability. Based on a supplier's response, our procurement and sustainability teams can assess whether additional interventions are necessary to reduce risk and, if so, to correctively engage with the supplier.

Our global goal is for at least 75% of our strategic and critical suppliers to have completed an EcoVadis assessment within the past two years. In the financial year ending on 30 June 2022, the Amcor Group achieved this goal.

- **Supplier questionnaire:** As part of the supplier onboarding process, all new suppliers managed centrally through Amcor Group's global and Business Group procurement functions are required to complete a self-assessment questionnaire. This questionnaire contains a set of sustainability-related questions which helps our procurement teams assess and address potential environmental and social risks before we initiate a relationship with the supplier. Covered topics vary slightly between Business Groups based on the most relevant local issues, but commonly include environmental incidents, labor/OSHA violations, ethical supply chain audits, participation in EcoVadis or equivalent reporting, environmental certifications, business ethics and environmental management policies, sustainability goals, and coverage of environmental, health, safety, human rights, and social requirements in the supplier's code of conduct.
- **AIM-PROGRESS:** The Amcor Group participates in AIM-PROGRESS, a forum of leading Fast-Moving Consumer Goods manufacturers and common suppliers, which offers a pre-competitive environment for collaboration and brainstorming on human rights and environmental issues in the supply chain. Some of the projects the Amcor Group contributes to in this capacity are:

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- the development of a supplier assessment module to evaluate human rights risks in the recycled content supply chain,
 - the mutual recognition of supplier audits and other assessments,
 - the engagement of indirect suppliers in responsible sourcing activities, and
 - the alignment of best practices around supplier codes of conduct.
- Sedex: The Amcor Group is also a member of Sedex, the Supplier Ethical Data Exchange, a not-for-profit organisation dedicated to driving improvements in ethical and responsible business practices in global supply chains.
 - Training: Procurement teams across the various Business Groups are trained on how to review and understand EcoVadis survey scores and responses. This includes labour and human rights sections of the surveys so they are well placed to identify potential modern slavery risks and work with suppliers if necessary. More in-depth training on modern slavery is a focus for the Amcor Group in fiscal year 2023.

Remediation processes

The Amcor Group has a number of processes in place to work with suppliers on corrective actions if necessary. We also have a number of mechanisms which allow employees and third parties to report concerns about suspected or actual improper conduct, including in relation to modern slavery. These include the following:

- Code of Business Conduct and Ethics: The Amcor Group Code of Business Conduct and Ethics (**Code**) provides a framework for making ethical business decisions, with regard to the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. It establishes the importance of exercising sound, ethical judgment and to recognize the shared values we have with our customers, shareholders, employees, suppliers and other third parties with whom we do business.

The Code is applicable to all directors, officers, employees, agents, contractors and secondees of the Amcor Group and includes a set of detailed standards and guidance related to areas such as business integrity, labour practices, health and safety, legal compliance, conflicts of interest, risk management, and escalation of issues. Topics covered include non-discrimination, freedom from harassment, prohibition of child labour, and freedom of association.

The Code is communicated to all new employees in their local language and all Amcor Group employees are required to review and sign the Code to confirm their understanding and adherence. The Code is also available on the Amcor Group website.

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- **Whistleblower Service:** The Amcor Group has a Whistleblower Policy and an independent, third-party Whistleblower Service which enables employees and external stakeholders to report wrongdoing online or through a dedicated, multilingual hotline that operates 24 hours a day via an independent third-party service provider. A report may be submitted anonymously where permitted by law. Wrongdoing can include but is not limited to potential modern slavery related concerns, and other breaches of our Codes of Conduct and other policies. The Whistleblower Service and all supporting information is available in all the local languages where the Amcor Group operates.

All complaints received are referred to Amcor's Whistleblower Committee for investigation in collaboration with the relevant Business Group or internal audit function. Outcomes from each investigation are reported to the Board of Directors. No modern slavery related concerns have been raised through the Service in the financial year ending 30 June 2022.

- **EcoVadis:** Suppliers who fail to obtain a minimum score of 45 in their EcoVadis assessments require follow-up action. This score is the threshold suggested by EcoVadis for acceptable performance. Through these assessments, we identified several suppliers who had received a score below this threshold. Using corrective action plans developed based on the EcoVadis assessment results, we worked with these suppliers to improve their environmental and social performance.

Assessing the effectiveness of Amcor's actions

Amcor Group has put in place key performance indicators to monitor the effectiveness of the actions that it has (and the reporting entities have) taken to mitigate modern slavery risks in its operations and supply chains.

- **EcoVadis:** The Amcor Group completes an annual EcoVadis assessment of its operations at a global level, including in respect of the reporting entities. EcoVadis evaluates how well we have integrated the principles of corporate social responsibility into our business and management systems and suggests areas for continued improvement. In our latest assessment, the Amcor Group achieved an EcoVadis Gold rating, placing us in the top 5% of all companies assessed by EcoVadis and in the top 1% of companies in our sector regarding sustainable procurement.
- **Social Audits:** Amcor Group conducted 54 social and ethical site audits at the request of its customers in the financial year ending 30 June 2022. These were primarily Sedex Members Ethical Trade Audit (SMETA) audits, though they also included a number of audit modules developed by individual customers. The number of audits performed each year fluctuates due to audit schedules and customer demands.

Priorities across the Amcor Group

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In fiscal year 2022, Amcor Group achieved its goal of 75% of strategic and critical suppliers completing an EcoVadis assessment within the past two years, and 100% having signed our Supplier Code or demonstrate an acceptable equivalent.

Amcor Group's priorities moving forward are to better leverage tools, such as EcoVadis, to evaluate, assess and help improve suppliers that are identified as higher risk.

To ensure our Procurement teams remain up-to-date on the latest goals and issues related to responsible procurement, our sustainability team conducts ongoing training for Procurement team members, with mandatory trainings for team members at or above the level of category manager. In fiscal year 2023, modern slavery will be added as a topic to this training schedule. This is in addition to the training already provided to Procurement teams on understanding EcoVadis survey responses.

In addition, we will be conducting more in-depth training on modern slavery across the Amcor Group as part of a larger set of training related to Amcor Group's Code of Business Conduct and Ethics.

Consultation and approval

In preparing this Modern Slavery Statement, Amcor consulted with a cross-functional working group of employees with responsibility for the oversight of procurement, sustainability, legal and risk processes across the business. Amcor Group management team members with specific operational responsibility for the reporting entities covered by this Statement (and the entities owned or controlled by them), were also asked to provide feedback on the Statement prior to it being presented to the Board of Amcor plc for final review and approval.

This statement is made in accordance with a resolution of the Board of Directors of Amcor plc.



Ron Delia
Managing Director and Chief Executive Officer