

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).

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 CHESS Depository Interests listed on the Australian Securities Exchange. Amcor plc has over 280 subsidiaries in 57 jurisdictions, including Australia, New Zealand, Europe, USA, Latin America, Asia, and Africa (**Amcor Group**). Amcor Group's corporate head office is 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 of the Amcor Group for the purposes of this Statement for the year ended 30 June 2020 are Amcor plc, Amcor Pty Ltd, Amcor Services Pty Ltd, Amcor Flexibles Group Pty Ltd, and Amcor Flexibles (Australia) Pty Ltd (collectively referred to as "**Amcor**").

Operations

Amcor Group is a leading global packaging business with approximately 47,000 employees, 230 sites in over 40 countries, and revenues of approximately US\$12.5 billion. We produce rigid and flexible packaging, specialty cartons and closures for consumer and healthcare products. Amcor Group's manufacturing facilities are located in Europe, USA, Latin America, Asia Pacific, and Africa. Our operations are supported by the Amcor Group's centralised R&D activities, and local and regional distribution, purchasing, marketing and sales activities.

Supply Chain

With over 37,000 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 900 local suppliers, in addition to international suppliers from New Zealand, Indonesia, India, Thailand, Vietnam, China, USA, and Europe.

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 direct goods and services used in the manufacturing of packaging, and indirect goods and services used to support its operations. Direct goods and services include resin, film and speciality goods (such as inks, adhesives, solvents, foil and paper). Indirect goods and services broadly include logistics, pre-press materials, machinery, maintenance, repairs and operations, and facilities management.

During the reporting period for the year ended 30 June 2020, the Amcor Group operated its 230 sites around the world with minimal disruption despite the COVID-19 outbreak and did not experienced significant business continuity issues related to accessing raw materials.

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. Though the packaging industry's supply chain is less susceptible to such issues than many other industries, we are aware of the need to remain vigilant to protect ourselves, our customers, and our communities.

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. 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:

- *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.

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. 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:

- Amcor Group's suppliers are required to comply with the principles outlined in its Supplier Code of Conduct (**Supplier Code**), which covers the areas of business integrity, labour standards, occupational health, and environmental management and improvement. More specifically, 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. We aim for 100% of strategic and critical suppliers to sign the Supplier Code or demonstrate they have an equivalent code in place.

- We also engage with EcoVadis, a global supply chain sustainability ratings platform. We utilize the platform to evaluate our suppliers and understand their performance on four themes: environment, labour practices and human rights, fair business practices, and procurement sustainability. Based on suppliers' overall EcoVadis scores, our procurement teams determine next steps for corrective engagement, if necessary. In general, we require suppliers to provide us with an updated EcoVadis survey every 1 to 2 years. Several of our Business Groups also require suppliers to answer a set of sustainability-related questions during the supplier onboarding process. Our sustainability and procurement teams are collaborating to standardize this process across Business Groups.
- The Amcor Group participates in AIM-PROGRESS, a forum of leading Fast-Moving Consumer Goods manufacturers and common suppliers. In doing so, we work with customers and peers to advance responsible procurement across the industry, which offers a pre-competitive environment for collaboration and brainstorming on human rights and environmental issues in the supply chain.
- 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.

Remediation processes

The Amcor Group has 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:

- The Amcor Group has a Code of Conduct and Ethics Policy (**Code**) providing a framework for making ethical business decisions, to establish the importance of exercising sound, ethical judgment and to recognize the shared values we have with our customers, stockholders, employees, suppliers and other third parties with whom we do business, having regard to the OECD Guidelines for Multinational Enterprises. The Code is applicable to all directors, officers, employees, agents, contractors and secondees of the Amcor Group. The Code is communicated to all new employees and new employees are required to confirm their understanding of the Code.
- The Amcor Group has a Whistleblower Policy and an independent, third-party Whistleblower Service which enables employees and external stakeholders to report anonymously potential modern slavery related concerns and other breaches of our Codes of Conduct.

Assessing the effectiveness of Amcor Group's actions

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

The Amcor Group completes an annual EcoVadis assessment of its operations at a global level. 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, we achieved an EcoVadis Silver rating, placing us in the top 4% of companies assessed by EcoVadis in the manufacture of plastic products industry.

Other ways in which Amcor Group assesses the effectiveness of its actions in response to modern slavery risk are summarised below:

- Amcor Group sites complete annual Sedex self-assessments and selected sites undergo third party Sedex Members Ethical Trade Audit (SMETA) assessments.

- The Amcor Group responds to customer-specific self-assessment surveys and has undergone ethical audits against customer protocols.
- All Amcor Group co-workers are required to review and sign our Code which covers identification and management of human rights issues. Additionally, 69 social and ethical audits were conducted across the Amcor Group during the year ended 30 June 2020. The number of audits performed in any one year may fluctuate as a result of audit schedules and customer demands. The audits conducted this year are considered to cover a representative number of Amcor Group sites. We share the information collected in the Sedex and EcoVadis assessments with our customers.

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 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

