



# Modern Slavery Statement

2025

# Introduction

This Modern Slavery Statement (**Statement**) is made under the Modern Slavery Act 2015 of the United Kingdom (**UK MSA**) and the Australian Modern Slavery Act 2018 (Cth) (**AU MSA**). It sets out the actions taken by Amcor to identify, assess and address modern slavery risks in its operations and supply chain for the fiscal year ended 30 June 2025 (**FY25**).

This Statement is a joint statement by Amcor plc made on behalf of Amcor plc and its controlled entities that are deemed reporting entities under the AU MSA (together, **Amcor Group**). These entities are Amcor Pty Ltd, Amcor Flexibles Group Pty Ltd and Amcor Flexibles (Australia) Pty Ltd. All three are incorporated in Australia and were consulted during the preparation and review of this Statement.

On 30 April 2025, Amcor plc completed a transformational all-stock merger with Berry Global Group, Inc. (**Berry**) creating one of the world's largest consumer packaging and dispensing solutions for nutrition, health, beauty and wellness. The combined business brings together complementary capabilities in rigid and flexible packaging, material science and sustainability innovation, with a workforce of more than 75,000 employees across over 400 locations in more than 40 countries and with combined annualised sales of US\$23 billion<sup>1</sup>.

As the merger was completed near the end of the reporting period, Berry's operations are not included in this Statement. Integration is underway to align governance frameworks, compliance systems and risk management methodologies across the combined business. Our expanded global footprint and complex supply chains reinforce the need for strong due diligence processes to uphold our commitment to preventing and addressing modern slavery. Future statements will reflect the broader scope of the merged operations as this integration progresses.

Unless otherwise indicated, the information in this Statement is a consolidated description for the Amcor Group, excluding Berry's operations. This Statement should be read in conjunction with our public filings lodged with the Australian Securities Exchange and other periodic reports, our Code of Conduct, our Supplier Code of Conduct and other relevant policies available at Amcor Corporate Governance Policies and Standards.

The terms "we", "our" or "us" in this Statement refer collectively to the Amcor Group unless otherwise indicated.

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<sup>1</sup>Sales figures presented on an unaudited combined basis as if the acquisition of Berry (and Berry's disposals of its Health, Hygiene & Specialties Global Nonwovens and Films businesses) had occurred as of July 1, 2024.

# The Amcor Group

Amcor is a global leader in developing and producing responsible packaging solutions across a range of materials for food, beverage, pharmaceutical, medical, home and personal-care products as well as other consumer goods. Our core packaging materials include plastic, paper and aluminium. These varied materials and markets involve complex supply chains, which we actively assess for modern slavery risks.

Amcor maintains a diverse and evolving product portfolio, delivering highly differentiated packaging solutions through ongoing innovation and close collaboration with customers, including many of the world's leading food and beverage companies.

## Structure and Governance

Amcor has a heritage of more than 150 years, with roots in both Australia and the United States.

Amcor plc is incorporated under the laws of the Bailiwick of Jersey as a public limited company. It maintains a primary listing on the New York Stock Exchange and a Foreign Exempt Listing on the Australian Securities Exchange through CHESSE Depository Interests. The global headquarters are in Zurich, Switzerland and the company operates extensively across Europe, North America, Latin America and the Asia Pacific.

At the highest level of the organisation, the Board of Directors of Amcor plc oversees Amcor's sustainability strategy, which includes oversight of human rights and modern slavery risks as part of its broader strategy and risk management responsibilities.

## Our Global Operations

The Amcor Group operates through two main segments – Global Flexibles Packaging Solutions and Global Rigid Packaging Solutions – supported by corporate functions: including Sales & Marketing, Sustainability, Research & Development, Procurement,

Finance and Information Technology, Strategic Development, Human Resources, Investor Relations, Legal and Company Secretarial.

Amcor manufacturing sites hold a range of certifications to internationally recognised standards, including ISO 9001, ISO 14001, ISO 15378, ISO 27001, ISO 45001, ISO 50001, Hazard Analysis Critical Control Points (HACCP), Brand Reputation through Compliance Global Standards (BRCGS), Ethical Trade Initiative (ETI), Aluminium Stewardship Initiative (ASI), Forest Stewardship Council (FSC) Chain-of-Custody and International Sustainability and Carbon Certification (ISCC). These certifications support our commitment to responsible business practices and provide a foundation for quality, environmental stewardship and ethical sourcing. Many sites are certified to multiple standards, reflecting the integration of these principles across our operations. We do not have a universal requirement for sites to hold specific certifications. While these certifications do not directly address modern slavery, they form part of our supplier assurance framework and complement our targeted due diligence processes aimed at identifying and mitigating modern slavery risks.

## Our Australian Operations

The reporting entities in Australia are supported by Amcor's corporate functions, as well as regional and local-level support.

Amcor Flexibles (Australia) Pty Ltd is the primary operating entity in Australia, focused on the manufacture and sale of Amcor products in Australia and New Zealand. Some products supplied to Amcor Flexibles (Australia) Pty Ltd customers are manufactured at Amcor sites in New Zealand to support regional demand. Amcor Pty Ltd and Amcor Flexibles Group Pty Ltd provide ancillary support services to members of the Amcor Group.



## Our Supply Chain

Amcor's supply chain is an extensive global network that supports the manufacture and distribution of packaging solutions across multiple sectors.

Our supplier base ranges from individual contractors and small, locally owned enterprises to publicly listed corporations and global multinationals.

In FY25, we engaged with more than 33,000 Tier 1 (direct) external product and service suppliers, with total spend of approximately US\$10.1 billion. Amcor defines Tier 1 suppliers as those with whom we have a direct contractual relationship for the supply goods or services. We may have one-off transactional purchase orders governed by our

standard terms and conditions as well as long-term supply agreements. Tier 2 and beyond are those suppliers who contribute to our supply chain indirectly, by supplying goods, services or labour to our Tier 1 suppliers. While Amcor does not contract with these suppliers directly, we recognise their role in our value chain and the importance of extending our due diligence efforts to these tiers and we intend to develop a strategy that will provide transparency.

In Australia, the procurement (source selection and price negotiation) of goods and services is primarily managed by the local procurement team based in Australia and New Zealand. For certain categories and international suppliers, these teams are supported by the regional

procurement team in Asia Pacific based in Singapore and, in some cases, by the global corporate team. In FY25, approximate spend by our Australian entities was between US\$150-200 million across local procurement and imported goods and services. This involved over 580 Tier 1 local suppliers, in addition to international suppliers from countries such as New Zealand, Indonesia, India, Thailand, China, Singapore, Chile, Hong Kong, Switzerland, the United States of America, the United Kingdom and across Europe.



# Our Workforce<sup>2</sup>

Our workforce is central to our operations and our commitment to ethical and responsible business practices. In FY25, we employed approximately 41,000 people across 40 countries with operations spanning 212 locations. These figures relate to legacy Amcor only and exclude Berry operations.

## Workforce composition

As of FY25, our global workforce (excluding Berry operations) was distributed as follows:

| Workforce data                     | FY22          | FY23          | FY24          | FY25          |
|------------------------------------|---------------|---------------|---------------|---------------|
| <b>Total workforce (headcount)</b> | <b>41,000</b> | <b>41,000</b> | <b>41,000</b> | <b>41,000</b> |
| <b>Workforce by age group</b>      |               |               |               |               |
| Under 30 years old                 | 16%           | 16%           | 19%           | 18%           |
| 30 to 50 years old                 | 55%           | 58%           | 54%           | 55%           |
| Over 50 years old                  | 30%           | 26%           | 27%           | 27%           |
| <b>Workforce by gender</b>         |               |               |               |               |
| Male                               | 78%           | 78%           | 77%           | 77%           |
| Female                             | 22%           | 22%           | 23%           | 23%           |
| <b>Workforce by region</b>         |               |               |               |               |
| North America                      | 30%           | 30%           | 31%           | 31%           |
| Latin America                      | 20%           | 20%           | 21%           | 21%           |
| Europe                             | 30%           | 30%           | 29%           | 29%           |
| Asia-Pacific                       | 20%           | 20%           | 19%           | 19%           |

| Gender representation in management              | FY22 | FY23 | FY24 | FY25 |
|--|------|------|------|------|
| <b>All management positions (levels 2-5)</b>     |      |      |      |      |
| Male   | 67%  | 65%  | 64%  | 63%  |
| Female   | 33%  | 35%  | 36%  | 37%  |
| <b>Junior management positions (level 5)</b>     |      |      |      |      |
| Male   | 64%  | 58%  | 57%  | 57%  |
| Female   | 36%  | 42%  | 43%  | 43%  |
| <b>Middle management positions (level 4)</b>     |      |      |      |      |
| Male   | 72%  | 74%  | 75%  | 72%  |
| Female   | 28%  | 26%  | 25%  | 28%  |
| <b>Top management positions (levels 2 and 3)</b> |      |      |      |      |
| Male   | 82%  | 82%  | 79%  | 78%  |
| Female   | 18%  | 18%  | 21%  | 22%  |

Amcor provides mechanisms for raising and addressing concerns, including anonymous reporting channels to address unethical or exploitative practices. These mechanisms are supported by our Whistleblower Policy and local HR procedures. Employees may also raise concerns directly with their manager, Human Resources or other appropriate contacts. We aim to ensure that information about the Whistleblower Service is displayed in visible and accessible locations across Amcor sites.

<sup>2</sup>The workforce data in this section includes all employees of legacy Amcor entities as at April 30, 2025. This covers anyone employed and paid directly by Amcor, including temporary employees and part-time employees. Contractors who provide services to Amcor but are not directly employed, are excluded. All data is from April 30, 2025, before our combination with Berry. Integration began immediately after completion and it would have been difficult to isolate the legacy Amcor population thereafter. We believe the data from before the merger provides the most accurate representation of Amcor's workforce for FY25. To estimate annual new hire and turnover rates, the figures were adjusted by a factor of 1.2 to account for two months of missing data.

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

## Identifying Risks

Amcor values its suppliers as key partners in maintaining product quality and ensuring operational continuity. We recognise that modern slavery risks may be heightened in certain parts of our supply chain and operations due to factors such as category type, our areas of operation, the geographical location of suppliers and worker risk profiles.

We have assessed the extent to which we may cause, contribute or be directly linked to modern slavery risks. While we are exposed to potential modern slavery risks in relation to permanent and temporary workers in our operations, we consider these to be low given our payroll and compliance systems. We consider that our more relevant risks reside principally in our supply chain, rather than in our own operations.

## FY25 Risk Assessment

In FY25, we launched the newest element of our responsible sourcing program, a supply chain abstract risk assessment focused on human rights and environmental risks. Using this tool, we assessed more than 7,700 of our Tier 1 suppliers—representing 93% of our total global spend—mapping potential risks based on each supplier's industry and location. These findings are informing our risk-based responsible sourcing goals for FY26 and beyond.

## Illustrative Risk Examples - Australian supply chain

Potential areas of risk include:

- **Facilities management suppliers:** potential use of child labour or illegal migrant workers to manage costs and demand fluctuations.
- **Personal protective equipment and uniform suppliers:** risks of child labour, servitude or forced labour in textile production, including upstream materials and finished goods such as uniforms, gloves, protective glasses, hats and ear plugs.
- **Ocean freight suppliers:** possible forced labour and debt bondage among low-cost country labour at shipping ports or onboard cargo ships. Appointed shippers may reassign cargo to other freighters, reducing direct control over labour practices.
- **Local transportation suppliers:** potential use of child labour or illegal migrant workers by transport and warehouse operators to reduce costs or respond to demand variations.
- **Waste management/processing:** risks of child labour or forced labour in recycling processes for post-consumer and post-industrial waste.
- **Raw material suppliers reliant on extractive industries:** risks of child labour or illegal migrant workers in extraction and processing operations.



# Actions taken to address modern slavery risks

Amcor has a framework in place to assess and address modern slavery risks across its operations and supply chains. Forming part of this framework are our due diligence and remediation processes and supporting policies designed to identify, manage and mitigate these risks.

## Supplier-Focused Actions

### Supplier Due Diligence and Engagement

While the packaging industry may be considered lower risk for certain forms of exploitation compared to other sectors, we recognise that modern slavery can occur in any industry and jurisdiction. Amcor remains vigilant and proactive in identifying and addressing risks across our operations and global supply chain. This Statement outlines our key modern slavery risk exposures and the actions we take to mitigate them.

We categorise our suppliers as strategic, critical, core or other, based on spend, size and strategic importance to Amcor. This categorisation is reviewed annually to ensure accuracy and relevance. In FY25, 139 Tier 1 suppliers were considered strategic or critical, representing approximately US\$5 billion of total spend. These suppliers are subject to enhanced oversight and engagement, including contractual obligations, performance monitoring and risk assessments.

We strongly value our suppliers as partners in delivering product quality, maintaining operational continuity, advancing our sustainability goals and upholding labour and human rights across our supply chain. We recognise that modern slavery risks vary by geography, sector and supplier type and we prioritise engagement with suppliers in higher-risk regions and industries.

### EcoVadis Compliance

Amcor requests that all our strategic and critical suppliers complete assessments through the EcoVadis global supply chain sustainability rating platform. EcoVadis helps us evaluate each supplier's performance regarding the environment, labour practices and human rights, fair business practices and procurement sustainability. Based on a supplier's responses, 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 75% of our strategic and critical suppliers to have completed an EcoVadis

assessment within the past two years, with a minimum score of 45 – the minimum acceptable risk threshold as identified by EcoVadis.

As of June 2025, 113 (81%) of legacy Amcor strategic and critical suppliers – representing US\$4.1 billion in total spend – had reached this benchmark. We identified 5 suppliers with a score below 45 and followed up through EcoVadis to request the suppliers engage in corrective actions to improve their scores. Where suppliers fail to meet minimum standards or improve following corrective action requests, Amcor may escalate engagement, suspend orders or terminate the relationship.

Amcor also completes its own EcoVadis assessment to demonstrate that Amcor has the necessary policies and established practices that prohibit modern slavery including our practices in respect of working with people under the age of 18. Customers can view our EcoVadis assessment score and verify the level of risk Amcor has in its own operations in respect of human rights or labour rights (of which modern slavery risk is a subset).

In October 2025, Amcor was recognised with the EcoVadis Silver Medal for our ongoing commitment to sustainability. Amcor's overall score placed us in the top 15% of companies assessed by EcoVadis. This recognition highlights the significant strides we have made toward our sustainability goals, including responsible procurement practices and continuous improvements in our supply chain.



Received EcoVadis Silver Medal ranking in the top 15% of companies assessed



81% of critical and strategic suppliers were assessed by EcoVadis

## Supplier Code of Conduct compliance

Amcor's Supplier Code of Conduct (SCoC) covers business integrity, labour standards, occupational health and environmental management. Our goal is for all our suppliers to sign our SCoC or demonstrate they have an equivalent internal code of conduct in place. In FY25, we achieved 93% compliance with this goal across legacy Amcor strategic and critical suppliers. As a standard part of our supplier onboarding process, all new suppliers managed centrally through Amcor's global and business group procurement teams are expected to sign and comply with our SCoC before they start doing business with us.

Following our combination with Berry, we updated Amcor's SCoC to integrate the strongest elements of both legacy companies' standards. We will roll out this new SCoC to the combined supplier base over the coming year.

## SEDEX and Social Audits

Amcor participates in SEDEX in two ways: self-assessment questionnaires (SAQs) and SEDEX Members Ethical Trade Audits (SMETA). We aim for all our manufacturing sites to update their SAQs annually. These assessments focus on topics like company policies, safety standards, working conditions and environmental impact. Following SEDEX's update of the SAQ module in October 2023, Amcor set a goal for all our sites to have updated their SAQs by the end of calendar year 2024. This goal was successfully achieved.

In fiscal year 2025, Amcor also conducted 45 full and follow-up SMETA audits, as well as a range of other customer-specific social audits focused on ensuring responsible and

ethical management practices at Amcor sites. These four-pillar audits provide a standardised and verifiable approach for assessing performance related to labour, health, and safety, environment and business ethics. The number of audits performed each year fluctuates due to audit schedules and customer demands. We use the results of these audits to identify and share best practices and implement corrective actions to drive improvements.

## Supplier Onboarding Questionnaire

We require our suppliers to help us minimise the potential environmental, labour, and human rights risks within our supply chain. Many of our business groups require new suppliers to complete a self-assessment questionnaire during the onboarding process. This questionnaire contains a set of sustainability-related questions, which help our procurement teams assess and address potential environmental and social risks before we initiate a relationship with the supplier. The topics covered vary slightly between business groups and are based on the most relevant local issues, but they commonly include environmental incidents, labour/safety violations, ethical supply chain audits, participation in environmental reporting, environmental certifications, business ethics and environmental management policies, sustainability goals and the coverage of environmental, health, safety, human rights and social requirements in the supplier's code of conduct.

Insights from supplier assessments, grievance mechanisms and audit outcomes are used to inform risk prioritisation, supplier engagement strategies and the allocation of resources.

## Broader Organisational Actions

### Our people and community engagement

We prioritise fostering an inclusive workplace culture, bringing together people from various nationalities and backgrounds. This approach supports our business success and helps create an environment where respect and dignity are upheld – reducing vulnerability to exploitation.

In FY25, we developed a global community engagement framework focused on four key areas: caring for future talent, caring for people, caring for the environment and emergency relief. These initiatives aim to make a positive impact and reinforce our broader human rights commitments.

### Health and safety

We are committed to fostering a safe, inclusive and respectful workplace. Our global Environment, Health and Safety (EHS) programmes help reduce risks of exploitation by promoting accountability and worker participation. These measures form part of our broader human rights approach, helping to reduce vulnerabilities that may contribute to exploitative practices. In FY25, approximately 80 per cent of legacy



Amcor employees were represented by joint management–worker safety committees, which meet regularly to identify and address workplace risks.

Our employees are central to our commitment to ethical and responsible business practices. In FY25, we reduced recordable injuries by 2% compared with the previous year, while 68% of our sites were injury-free. Amcor’s recordable case frequency rate (RCFR) was 1.35 (0.27 total recordable injury rate), which corresponded to 126 recordable injuries. This includes all employee injuries requiring medical treatment. Our lost time injury frequency rate (LTIFR) was 0.34 (0.07 lost-time incident rate), corresponding with 32 lost-time injuries. This includes all employee injuries resulting in time away from the job. We recorded zero cases of work-related illnesses and zero employee fatalities in FY25. These metrics include temporary workers under the direct supervision of Amcor personnel.

Amcor’s global contractor management program sets minimum expectations for all locations, mandating a rigorous approach for selection, training, work authorisation and inspection of contractor work. Contractors are third-party companies hired to conduct specialised work on Amcor’s behalf. While contractor injuries are not included in our LTIFR or RCFR metrics, all contractor injuries on Amcor premises are reported, investigated and addressed as needed. In FY25, 51 contractor injuries were recorded at Amcor facilities, ranging from minor first aid injuries to more serious injuries and incidents. Compared with the previous year, this represented a slight decrease in the number of injuries. We recorded zero contractor fatalities.

These results reflect the effectiveness of our global EHS programmes, which include rigorous protocols, enhanced training and active employee engagement. We recognise that unsafe working conditions can be indicators of broader human rights risks, including modern slavery. By prioritising worker welfare, we help ensure that our operations and supply chains are free from exploitative practices. Our EHS systems are integrated with our broader human rights framework and due diligence processes, helping us identify and mitigate risks of exploitation across our operations and supply chain.

Safety committees play a key role in fostering a culture of safety and accountability. They generally meet monthly and consist of management team members and employees from various departments, job functions and shifts. Meaningful engagement at site level helps raise awareness, align behaviours and ensure ongoing responsibility for safety matters. These committees are a common way for site leaders to engage with colleagues and gather ideas on measures to mitigate unsafe behaviours and conditions in the workplace.

## Due Diligence Processes and Governance

The following sections describe the processes and policies that help keep Amcor informed about developing trends, tools, and requirements for modern slavery risk management which we consider when evolving our practices and processes on identifying, assessing, and managing modern slavery risk in our supply chain.

Amcor recognises the importance of honesty, integrity and fairness in conducting our business

and is committed to increasing shareholder value in conjunction with fulfilling our responsibilities as a good corporate citizen. Ethical corporate governance and transparency underpin our approach and support oversight of human rights and modern slavery risks.

We strive to maintain a corporate culture that prioritises internationally accepted practices and considers our impact on people and communities. Oversight of human rights, including modern slavery, forms part of our broader governance framework and is supported by Board-level responsibility for sustainability and risk management.

We believe honest, open dialogue with and among our stakeholders is essential to building a more sustainable future for the packaging industry. We regularly engage in transparent discussions about our sustainability strategies, impacts and opportunities with customers, investors, suppliers and other interested parties.

Throughout the year, we complete assessments through external ratings platforms at the request of various stakeholders. Such assessments help us to benchmark our performance and identify areas for improvement. These are carried out via disclosure platforms such as CDP, EcoVadis, S&P Corporate Sustainability Assessment, SEDEX, MSCI, Sustainalytics, ISS ESG and FTSE4Good.

In FY25, we formed an ESG regulatory reporting team to strengthen compliance and transparency in this evolving regulatory environment.

## Policies

In FY25, Amcor reviewed its core governance policies, including the Code of Conduct, Anti-Bribery

and Corruption Policy, Fraud Risk Management Policy, Whistleblower Policy and Supplier Code of Conduct, to ensure alignment with evolving human rights and modern slavery expectations.

In addition, we took an important step forward on our human rights journey by developing Amcor's first Human Rights Policy. It describes our priorities for conducting business in a manner that aligns with internationally respected human rights and respects the dignity of all people, prioritising focus areas that include workplace health and safety, freedom from discrimination and harassment, freedom from child labour, freedom from forced labour, freedom of association and collective bargaining, compensation, working hours and environmental justice. It describes the grievance mechanisms that we have in place for reporting potential human rights issues and the corrective action and remediation process we are committed to in the event of a confirmed incident.

All directors, managers and employees are expected to demonstrate integrity and objectivity at all times, consistently working to strengthen Amcor's reputation and performance. These core principles, which Amcor plc's Board of Directors and senior management team are committed to upholding, are enshrined in our values and reflected in our global policies. Our public policies, including those referenced above, can be accessed in the Investors section of our website.

Whistleblowing and grievance mechanisms: Following the merger with Berry, Amcor commenced a comprehensive review of its whistleblower processes and procedures. This review aims to harmonise the legacy Amcor and Berry systems, reduce case closure

times and ensure consistency in how concerns are received, triaged, investigated and resolved across the combined organisation. The integration process is ongoing and expected to continue into fiscal year 2026. As part of this effort, we are assessing opportunities to streamline reporting channels, enhance case management tools and improve feedback loops to ensure that all stakeholders — including employees, suppliers and third parties — have access to effective, trusted and timely grievance mechanisms.

The Whistleblower Service enables co-workers and third parties, such as suppliers, consumers, contractors, and customers, to report potential misconduct within the organisation. It is available online and through a dedicated, multilingual hotline that operates 24 hours a day via an independent third-party service provider. Complaints may be submitted anonymously where permitted by law. All complaints received are referred to Amcor's Whistleblower Committee for investigation in collaboration with the relevant business group or internal audit function. Posters promoting the Whistleblower Service are displayed in visible and accessible locations at every Amcor site, helping to ensure that all employees and visitors are aware of the reporting channels available to them.

Where concerns are substantiated, Amcor is committed to working with affected individuals and relevant stakeholders to ensure appropriate remediation and support.

Reports on matters raised through the Whistleblower Service are also provided regularly to the Audit Committee and Compensation Committee, depending on the nature of the matter raised.

In FY25, we completed 205 whistleblower investigations. These included five related to accounting and internal controls, 18 to business integrity, 16 to misuse and misappropriation of corporate assets, 21 to health, safety and the environment, 96 to HR and labour practices, 48 to harassment and discrimination and one related to other compliance topics. These numbers reflect only incidents reported through whistleblower mechanisms, and not matters that were reported solely to, and investigated solely by, our HR function.

In addition to our Whistleblower Service, Amcor offers other ways in which internal and external stakeholders can communicate concerns or grievances. Our communications teams are active on social media channels, through which we engage with our community members, employees, and other stakeholders. The Contact Us section of our public website allows all stakeholders to submit information or request a point of contact. We additionally share a contact email address in our sustainability report every year.

For employees, our business groups have established complaint reporting and resolution procedures to provide a prompt, systematic, orderly, and confidential method of discussing and resolving problems and differences of opinion among co-workers or between co-workers and the company, work-related misconduct such as discrimination, harassment, dishonesty, and other workplace issues. Reported issues are investigated by Human Resources leadership. The third-party SMETA social that audits many of our sites complete each year, also provide a way for employees at those sites to communicate any concerns or grievances.

## Cybersecurity

Cybersecurity is a critical element of Amcor's activities to protect our digital assets and ensure smooth business operations. Our information and information processing infrastructure are vital assets requiring protection equal to their value or risk to Amcor. Amcor's IT Security Policy guides our approach to cybersecurity, specifying how company information, applications, systems, and networks must be managed to ensure security, confidentiality, integrity and availability.

## Training

To keep our procurement teams updated on the latest goals and issues related to responsible procurement, we conduct annual

sustainability-related training, which is mandatory for team members at or above the level of category manager. We also develop ad-hoc training as needed to support progress across various responsible sourcing initiatives, including those listed below.

In FY25, we also hosted modern slavery training for procurement team members in roles that require interaction with suppliers. We achieved a 100% completion rate, with 107 individuals completing the training. After our combination with Berry, we rolled out the training to 160 new colleagues. The training module introduces the concept of modern slavery, identifies potential risk areas in Amcor's supply chain and explains the practices we have implemented to mitigate these risks.

In addition, Amcor delivered a global Code of Conduct training to approximately 11,000 individuals globally, achieving a completion rate of over 96 per cent. This training focused on core ethical principles, expectations of behaviour and the importance of speaking up. While the training did not specifically address modern slavery, it supports our broader compliance culture. A dedicated modern slavery module is planned for inclusion in the next iteration of the Code of Conduct training in FY26, providing employees with a targeted awareness of modern slavery risks and reporting mechanisms.

# Assessing the effectiveness of Amcor's actions

## Amcor evaluates the effectiveness of its actions through multiple mechanisms, including supplier assessments, audit outcomes, grievance mechanism data and compliance monitoring.

In FY25, these measures included EcoVadis ratings which informed corrective actions for five suppliers scoring below our minimum threshold. We also track compliance with our Supplier Code of Conduct and training completion rates.

Insights from these evaluations inform our ongoing improvements to risk management and supplier engagement.

To improve our approach, we are enhancing data collection and analysis, refining risk assessment tools and strengthening supplier engagement.

Following the merger with Berry, Amcor recognises that integration of legacy systems, supplier standards and organisational cultures may temporarily affect visibility and consistency in modern slavery risk management.

We are actively working to harmonise due diligence processes, supplier onboarding protocols and grievance mechanisms across the combined business.

Amcor is not aware of any instances of child labour, forced labour or human trafficking within its operations during the reporting period.

## Priorities across Amcor

We aim to advance our practices to better identify, assess and address modern slavery risks. Building on progress made in FY25, our focus areas for FY26 and beyond include:

- Expanding the use of SEDEX self-assessment questionnaires (SAQs) across Amcor and Berry operations. Following updates at legacy Amcor sites, we intend to extend this process to Berry sites to improve coverage and visibility.
- Refining supplier risk assessment approaches in higher-risk categories and geographies, drawing on insights from our FY25 screening of over 7,700 suppliers.
- Increasing modern slavery awareness across the organisation, including plans to integrate a modern slavery module into the global Code of Conduct training.
- Improving the use of data and digital tools to inform supplier engagement and track performance.
- Evaluating the effectiveness of risk mitigation efforts in our supply chain.
- Continuing to identify and address areas of elevated modern slavery risk.
- Aligning procurement, compliance, sustainability and operational decision-making with our Human Rights Policy.

## Consultation and approval

It is made in accordance with a resolution of the Board of Directors of Amcor plc as the primary entity of the Amcor Group and was separately approved by the directors of each Australian reporting entity.

In preparing this Statement, Amcor engaged a cross-functional

working group with responsibility for procurement, sustainability, legal and risk oversight.

Management team members with operational responsibility for the reporting entities covered by this Statement (and the entities owned or controlled by them) were also consulted and invited to provide feedback.



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Amcor plc



[www.amcor.com](http://www.amcor.com)