



Modern Slavery Statement

2024



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 the Amcor Group reporting entities to assess and address modern slavery risks in its operations and supply chain for the fiscal year ended 30 June 2024 (**FY24**).

This Statement is a joint statement by Amcor plc on behalf of Amcor plc and its controlled entities (**Amcor Group** or **Group**) deemed to be reporting entities under the AU MSA, namely: Amcor Pty Ltd, Amcor Flexibles Group Pty Ltd and Amcor Flexibles (Australia) Pty Ltd. The reporting entities are companies incorporated in Australia.

The information set out in this Statement is a consolidated description for the Amcor Group, except where information is identified as being relevant to a reporting entity. The Statement should be read in conjunction with our public filings lodged with the Australian Stock Exchange and other periodic reports, the Amcor Code of Business Conduct and Ethics, the Amcor Suppliers' Code of Conduct and other policies available at Amcor Corporate Governance Policies and Standards.

This Statement is made in accordance with a resolution of the Board of Directors of Amcor plc as the primary entity of the Amcor Group. The terms "we", "our" or "us" in this Statement refer collectively to the Amcor Group unless otherwise indicated.

Contents

The Amcor Group	3
Amcor at a glance - fiscal year 2024	5
Modern slavery risks in Amcor's operations and supply chains	6-8
Actions taken to assess and address modern slavery risks	9-10
Assessing the effectiveness of Amcor's actions	10
Priorities across the Amcor Group	11
Consultation and approval	11

The Amcor Group

Amcor is a global leader in developing and producing responsible packaging solutions across a variety of materials for food, beverage, pharmaceutical, medical, home and personal-care, and other products.

Amcor maintains a diverse and dynamic product portfolio of highly differentiated responsible packaging solutions unique to our customers' consumers through constant innovation and close collaboration with its customers who are leaders in the food and beverage industry. Amcor's main packaging materials are aluminium-based, paper-based and plastic-based.

Structure

Amcor's history dates back more than 150 years, with origins in both Australia and the United States of America.

Amcor plc is the primary entity of the Amcor Group. It was formed through the merger of Amcor Limited and Bemis Company Inc in 2019. This merger created a global leader in packaging solutions with Amcor plc being the main operating company.

Amcor plc is a public limited company incorporated under the laws of the Bailiwick of Jersey. Amcor plc has a Foreign Exempt Listing via CHESS Depositary Interests which allows it to be traded in the Australian Stock exchange while its primary listing is on the New York Stock Exchange. Amcor plc is headquartered in Zurich, Switzerland and has a significant presence in Europe, North America, Latin America, and the Asia Pacific.

At the highest level of the organization, our board of directors provides input and guidance on Amcor's sustainability strategy as an integrated part of their oversight of the company's overall strategy and risk management.

Our Global Operations

The Amcor Group operates through two main segments – Flexibles Packaging and Rigid Packaging – and its business units in Europe, Middle East and Africa, North America, Latin America, and the Asia Pacific. Amcor business units are supported by centralised corporate functions: Sales & Marketing, Sustainability, Research & Development and Procurement, Group Finance and Information Technology, Strategic Development Group, Corporate Human Resources, Investor Relations, Group Legal and Company Secretarial.

In fiscal year 2024, 41,000 Amcor people generated \$13.6 billion in annual sales from operations that span 212 sites in 40 countries.

Amcor manufacturing sites across the globe hold a range of certifications to internationally recognized standards including ISO 9001, ISO 14001, ISO 15378, ISO 27001, ISO 45001, ISO 50001, Hazard Analysis Critical Control Points (HACCP), British Retail Consortium (BRC), Ethical Trade Initiative (ETI), Aluminium Stewardship Initiative (ASI), Forest Stewardship Council (FSC) Chain-of-Custody, and International Sustainability and Carbon Certification (ISCC). Many sites hold certifications for multiple standards.

41,000

Amcor people generated **\$13.6 billion** in annual sales from operations that span **211** locations in **40** countries.



Our Australian Operations

The reporting entities in Australia are supported by the Amcor's global centralised functions, regional and local supply-chain, procurement, marketing, and sales functions.

Amcor Flexibles (Australia) Pty Ltd is the primary operating entity in Australia and is focused on the manufacture and sale of Amcor products in Australia and New Zealand. The other reporting entities, Amcor Pty Ltd and Amcor Flexibles Group Pty Ltd, provide ancillary support services to members of the Amcor Group.

Our Supply Chain

Amcor's Procurement team engages with a diverse supplier base in accordance with its group-wide procurement guidelines. Amcor's supply chain is a complex global network consisting of more than 31,000 external product and service suppliers, with whom we spent approximately \$9.8 billion in FY24. We categorize our suppliers as strategic, critical, core and other based on spend, size and strategic importance to Amcor. We reassess our supplier categorization annually to ensure the list is accurate and up to date. In FY24, we had 124 suppliers considered strategic or critical; combined, they represented approximately \$4.86 billion of our total spend.

We strongly value our suppliers as partners in ensuring the quality of our products, supporting the continuity and smooth functioning of our operations, driving progress toward our long-term sustainability goals, and ensuring labour and human rights are protected across the supply chain.

In Australia, the procurement (source selection and price negotiation) of goods and services is managed by the regional procurement team in the Asia Pacific, based in Singapore. Our Australian procurement team engages with over 550 local suppliers, in addition to international suppliers from New Zealand, Indonesia, India, Thailand, China, Singapore, Chile, Hong Kong, USA, United Kingdom and Europe.



Amcor at a glance - fiscal year 2024

Global sales USD

\$~13.6bn

Flexibles
76%

Rigid packaging
24%

Employees

~41,000

Countries
40

Sites
212

Global sales by region

48%
North America

22%
Western Europe

27%
Emerging markets

3%
Australia & New Zealand

Our business

Flexibles

Amcor's Flexibles business has a global presence and is one of the world's largest developers and suppliers of flexible packaging and specialty folding cartons.

Overview 2024

Sales USD10.3 billion
Number of plants 160*
Countries 36
Employees ~36,000*

End markets

The business develops and produces flexible packaging for food, beverage, pharmaceutical, medical, home and personal care, and other products.



Rigid packaging

Amcor's Rigid Packaging business is one of the world's largest suppliers of plastic containers and closures.



Overview 2024

Sales USD3.3 billion
Number of plants 52
Countries 11
Employees ~5,000

End markets

The business develops and produces rigid containers and closures for food, beverage, spirits, home and personal care, and healthcare products.

*Includes sites and employees in corporate functions.

Note: All amounts referenced throughout this document are in US dollars unless otherwise indicated and numbers may not add up precisely to the totals provided due to rounding.



Modern slavery risks in Amcor'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. We recognise that the risks of modern slavery may be heightened in some parts of our supply chain and operations because of the geographical location of suppliers and our areas of operation.

We have considered the extent to which we may be exposed 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.
- **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 to produce recycled materials.
- **Raw material suppliers reliant on feedstock from extractive industries:** use of child labour and/or illegal migrant workers in mining operations.

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.

Modern slavery

Though the packaging industry's supply chain is less susceptible to social issues such as child labour and forced or compulsory labour than many other industries, we nevertheless recognise that modern slavery has the potential to exist within our operations and complex supply chain and we continue to remain proactive in protecting ourselves, our customers and our communities from potential negative impacts stemming from our sourcing activities. This includes preparing a Modern Slavery and Human Trafficking Statement in accordance with section 54 of the United Kingdom Modern Slavery Act 2015 and section 14 of the Australian Modern Slavery Act 2018, as well as a Canadian Anti-Forced Labour and Child Labour Report in accordance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act. In these documents, which are both accessible through Amcor's public website, we identify our most relevant modern slavery risk exposures and share the actions we take to assess and address these risks.

In FY24, we also hosted modern slavery training for procurement team members in roles that require interaction with suppliers. We achieved a 97% completion rate, with 113 individuals completing the training. 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.

Supplier Code of Conduct compliance

Amcor's Supplier Code of Conduct (**SCoC**) covers the areas of business integrity, labour standards, occupational health and environmental management and improvement. Our goal is for all our suppliers to sign our SCoC or demonstrate they have an equivalent internal code of conduct in place. In FY24, we achieved 100% compliance with this goal across our strategic and critical suppliers. As a priority, Amcor's Supplier Code of Conduct is being extended to address high risk categories previously identified.

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 in the areas of 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 2024, 85% of our strategic and critical suppliers – representing \$4 billion in total spend – had completed an EcoVadis assessment with a minimum score of 45 within the past two years.

Amcor 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).



Achieved EcoVadis score in the **95th** percentile of all companies assessed



75% of critical and strategic suppliers were assessed by EcoVadis

Amcor has been recognised with the EcoVadis Gold medal for its ongoing commitment to sustainability. Amcor's overall score increased from 70 to 73 this year, placing us in the top 5% of companies assessed by EcoVadis and in the top 1% within our sector for sustainable procurement. This recognition highlights the significant strides we have made toward our sustainability goals, including responsible procurement practices and continuous improvements in our supply chain.

SEDEX

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. SEDEX updated the SAQ module in October 2023. Following that update, Amcor set a goal for all our sites to have updated their SAQs using the new module by the end of calendar year 2024. As of June 2024, over 85% of Amcor's sites have updated their SAQ.

In fiscal year 2024, Amcor conducted 33 full SMETA audits as well as a range of other customer-specific 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.

Supplier onboarding questionnaire

We require our suppliers to help us minimize the potential environmental, labour, and human rights risks within our supply chain. All new suppliers managed centrally through Amcor's global and business group procurement functions must 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. Covered topics vary slightly between business groups based on the most relevant local issues, but commonly include environmental incidents, labour/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.

Our people

Our employees are the foundation of our robust safety culture and the reason we celebrated our safest year on record at Amcor in FY24. This achievement reflects the strong safety culture our global teams have built, embraced, and embodied. Our rigorous safety protocols and enhanced training led to a 12% reduction in our total recordable injury rate (TRIR) compared to FY23. Our milestone achievement of a 1.36 recordable case frequency rate (RCFR) and a 0.27 TRIR not only positions us as a leader in the industry but also underscores the dedication and commitment of our workforce. Each team member plays a critical role in fostering a culture of safety, care, and mutual support, ensuring that every colleague returns home healthy at the end of each workday.

Our workplace brings together a diverse group of employees from various nationalities and backgrounds. We prioritize fostering an inclusive culture where everyone feels valued and a sense of belonging. The diversity of our team members is not just valuable — they are essential to Amcor's business success. We understand that diversity, equity, and inclusion are vital to creating an environment where innovation and creativity can thrive.

Amcor is committed to creating an empowering workplace. We understand the critical importance of community engagement. In FY24, we developed a global community engagement framework that strategically guides our efforts in four

key areas: caring for future talent, caring for people, caring for the environment and emergency relief.

Health and safety

At Amcor, we put people at the centre of everything we do. We recognize that they are the driving force behind our aspiration to become the leading global packaging company.

Our work to improve workplace safety, develop and support talent, foster diversity and engage our communities helps us act as one global team in which everyone has a voice and can make a difference. Amcor establishes expectations for managing health and safety risks in the workplace through a global management system comprised of Environment, Health, and Safety (EHS) Standards, co-worker training and development, EHS audits and self-assessments and core management principles. These program elements are integrated and upheld through management commitment and co-worker engagement globally.

Across the spectrum of EHS, our principal areas of focus remain on safety, compliance, and culture. Safety is a core value at Amcor. We champion safe and responsible behaviour among all co-workers, guided by a rigorous EHS program. Our goal is a workplace free from serious risks and undesired incidents.

Globally, approximately 80% of Amcor co-workers are represented by joint management/worker safety committees, which generally meet monthly. These committees are comprised of management team members and employees from various departments, job functions and shifts.

Safety 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. The focus areas for these committees in FY24 included training, milestone celebrations, machine guarding improvements, safety communications, material handling improvements, safety culture improvements, laceration prevention and hazard elimination or reduction. Our colleagues are encouraged to actively engage in their site's safety programs.

Amcor believes meaningful engagement is a cornerstone for a safe workplace. Many Amcor locations rely on local teams to develop and support local EHS programs. The team-based approach helps raise employee awareness, align beliefs and behaviours, and assure ongoing accountability for safety matters. Many plants have directive ownership programs where specific aspects of the site's EHS program are led by a colleague experienced in that topic area.



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 (**Framework**). Forming part of the Framework are our due diligence and remediation processes, and policies that underpin those processes.

Due diligence processes

The following sections describe the processes and policies that help keep the Amcor Group 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.

Corporate governance

Amcor recognizes 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 are fundamental to achieving our winning aspiration of being THE leading global packaging company.

We strive to maintain a corporate culture that prioritizes conducting business in accordance with internationally accepted practices and procedures and factoring in our impact on human rights.

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, Amcor discloses data related to our ESG impacts at the request of customers, investors, ratings agencies, and the broader public. These disclosure platforms include CDP, EcoVadis, S&P Corporate Sustainability Assessment, SEDEX, Moody's ESG, MSCI, Sustainalytics, ISS ESG and FTSE4Good.

Policies

All directors, managers and employees are expected to act with the utmost integrity and objectivity, always striving to enhance Amcor's reputation and performance. These core principles, which Amcor'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 summarized below, can be accessed in the Investors section of our website.

- Anti-Bribery and Corruption Policy:

This policy describes Amcor's zero-tolerance approach to bribery and corruption, provides information and guidance to recognize and deal with related issues and outlines the steps Amcor takes to manage associated risks.

- Code of Business Conduct and Ethics:

This policy provides a framework for making ethical business decisions. It is written having regard to the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. The policy 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, reporting breaches, risk management and escalation of issues. Topics covered include non-discrimination, freedom from harassment, prohibition of child labour and freedom of association. It is available in 22 languages in addition to English.

- Fraud Prevention Policy:

This policy establishes the general principles and minimum requirements for managing fraud risks across Amcor.

- Privacy Policy:

This policy directs the management of personal information, how it is collected, the purpose of its collection and to whom the information will be disclosed.

- Whistleblower Policy:

This policy describes the procedure for reporting wrongdoing, the investigation process and confirms Amcor's commitment to ensuring a safe reporting environment.

- **Whistleblowing and grievance mechanisms:**

Amcor's Whistleblower Service enables co-workers and third parties, such as suppliers, consumers, contractors, and customers, to report potential misconduct within the organization. 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. Outcomes from each investigation are reported to the board of directors but are not disclosed externally due to confidentiality protections.

In FY24, there were 141 whistleblower investigations completed. These included four related to accounting and internal controls, four related to bribery and corruption, ten related to business integrity, three related to misuse and misappropriation of

corporate assets, eleven related to health, safety, and environment, 44 related to HR and labour practices, 56 related to harassment and discrimination, and nine 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 senior HR 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.

Assessing the effectiveness of Amcor's actions

Amcor is currently working on creating key performance indicators and metrics to evaluate and monitor the effectiveness of our efforts to mitigate modern slavery risks within our supply chain and operations.

We acknowledge that this is a continuous and evolving process, and we are dedicated to establishing and continuously improving them. During this reporting period, we remain focused on having modern slavery clauses

included in our precedent contracts, ensuring our suppliers complete our self-assessment questionnaire, or where modern slavery cases are identified, taking appropriate action to remediate them.

Priorities across the Amcor Group

Amcor's priorities moving forward are to:

- develop a human rights due diligence strategy for fiscal year 2025;
- increase awareness of modern slavery and modern slavery risks in our operations and supply chain;
- make better use of tools, such as EcoVadis, S&P Corporate Sustainability Assessment and SEDEX;
- better understand and use data and insight from these tools to gain a more comprehensive understanding of our supply chain and operations;
- identify areas where modern slavery risks might arise or exist;
- take proactive steps to mitigate such risks; and
- uphold ethical practices across our enterprise.

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 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.



Peter Konieczny
Chief Executive Officer
Amcor plc



www.amcor.com