
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

AMCOR

CERTIFICATE
NUMBER

14

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

23 MAY 2019

DATE OF EXPIRY

22 MAY 2022

CERTIFIED SINCE

23 MAY 2019

AUTHORISED BY

A handwritten signature in black ink, appearing to be 'John' or similar, written over a green background.

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*Validity of this Certificate is subject to continued
conformance with the applicable ASI Standard
and can be verified at
www.aluminium-stewardship.org*

CERTIFICATION SCOPE

Amcor Flexibles for the Amcor Flexibles Singen
site (Germany).

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles Singen
CERTIFICATION SCOPE	Amcor Flexibles for the Amcor Flexibles Singen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication
ASI STANDARD	<ul style="list-style-type: none">• Performance Standard V2
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit
AUDIT FIRM	DNV GL
AUDIT DATE	11 September 2018, 17 – 19 October 2018, 2 April 2019 (follow-up desktop audit)
AUDIT REPORT SUBMISSION	12 December 2018 (Initial Audit Report) 13 May 2019 (Re-submitted Audit Report following desktop audit)
AUDIT SCOPE	Audit scope covers Amcor Flexibles for the Amcor Flexibles Singen site (Germany). Relevant criteria from the ASI Performance Standard were included in the audit scope. Supply chain activities included in the audit scope: <ul style="list-style-type: none">• Semi-Fabrication
AUDIT OUTCOME	<ul style="list-style-type: none">• Certification

AUDIT
METHODOLOGY
DECLARATION

The Auditors confirm that:

- The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.
- The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.
- The Audit Scope and audit methodology are sufficient to establish confidence that the findings are indicative of the performance of the Entity's defined Certification Scope.
- The Auditor(s) have acted in a manner deemed ethical, truthful, accurate professional, independent and objective.

CERTIFICATION
PERIOD

23 May 2019 – 22 May 2022

NEXT AUDIT
TYPE

Recertification Audit

NEXT AUDIT
DUE DATE

22 May 2022

CERTIFICATE
NUMBER

14

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	<p>Amcor Singen has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. Amcor Singen has systems in place to maintain adequate awareness of and to ensure compliance to applicable law.</p>
1.2 Anti-Corruption	Conformance	<p>Amcor Singen works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. Amcor Singen established adequate anti-corruption measures, such as policies, training, due diligence checks and whistleblowing line, endorsed by senior management. Amcor employees participate in web-based training related to anti-bribery and corruption laws and regulations and improper payments compliance. Please find below references to Amcor's whistleblowing policy and anti-corruption policy:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyl3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/3qxeS8RNeoQ2kCqiA8leQA/327df50886c9f1a5643e9e4a9e2af639/Amcor_Anti_Bribery_Corruption_Policy_English.pdf</p> <p>Please find below reference to Amcor's Whistleblowing Service:</p> <p>https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html</p>
1.3 Code of Conduct	Conformance	<p>Amcor Singen has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. Amcor Singen runs a regular training programme for employees and raised awareness of the Code among business partners and suppliers. More information can be found via the link below:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/lapnuToUbAU8yaiQg24cA/0f7fd5e05ea1034b6305dff8ba8f4329/Amcor_Sustainability_Report_2018.pdf</p>

CRITERION	RATING	COMMENT
		<p>Amcor's Code of Conduct is publicly available at: https://www.amcor.com/investors/corporate-gov/policies-standards</p>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	<p>Amcor Singen's management systems are certified to ISO 14001 and ISO 45001. The site's systems, procedures and processes conform to the environmental, social, and governance practices of the ASI Performance Standard. For further details, please see: https://www.amcor.com/investors/corporate-gov/policies-standards</p>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	<p>Amcor Singen has endorsement and support from senior management in order to provide sufficient resources for regular review of policies, meeting ASI Performance Standard requirements.</p>
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	<p>Amcor Singen communicates policies internally and externally which conform to the ASI Performance Standard requirement. Please see: https://www.amcor.com/investors/corporate-gov/policies-standards Worker interviews conducted during this audit confirmed employee's understanding of the Company's Policies and their duties.</p>
2.2 Leadership	Conformance	<p>Amcor nominated a person at senior management level who has overall responsibility and authority for ensuring conformance with this Standard and to ensure sufficient resources to support the implementation of the Standard.</p>
2.3a Environmental and Social Management Systems (environmental)	Conformance	<p>Amcor Singen holds ISO 14001 certification, certified by SQS. ASI recognizes ISO 14001 as responding to ASI Performance Standard criterion 2.3a.</p>
2.3b Environmental and Social Management Systems (social)	Conformance	<p>Amcor Singen has developed and implemented policies, systems, procedures and processes that conform to the social management systems requirements. The site is ISO 45001 certified. The site has a SMETA/Sedex audit undertaken in 2016 by third party, Intertek. No non-conformances or observations were noted.</p>

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2.4 Responsible Sourcing	Conformance	<p>Amcor developed and implemented a Global Procurement Policy and a Supplier Code of Conduct. Please see below link: https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</p> <p>Amcor undertakes supplier risk assessment via EcoVadis and conducts second party due diligence audits at supplier sites. The procurement team and relevant personnel are trained on an annual basis on responsible sourcing requirements. Please see Amcor's sustainability report for further details: https://assets.ctfassets.net/f7tuyt85vtoa/2EkF2w9NlScqM6uocc0ccU/d979dd59f6e43b70a486a4940a6b1e2e/Amcor_Sustainability_Review_2018.pdf</p> <p>Furthermore, Amcor is a founding member of ASI and participates in several initiatives, including the Carbon Disclosure Project (CDP) and has several sites certified according FSC chain of custody standard. https://info.fsc.org/certificate.php#result).</p>
2.5 Impact Assessments	Conformance	<p>The assembling of the heat recovery units at the air abatement system started in April 2017 and was finished in September 2017. Amcor Singen joined ASI in June 2017, therefore this new project is in scope for the evaluation of conformance against ASI Performance Standard 2.5. Amcor Singen's impact assessment of the new project included an analysis of carbon and energy savings, maintenance risks of occupational, health, safety and environment (OHSE), contractors were checked against the Amcor Code of Conduct, which is conformant to ASI Performance Standard requirements.</p>
2.6 Emergency Response Plan	Conformance	<p>Amcor Singen holds ISO 14001 and ISO 45001, certified by SQS which are recognised by ASI as responding to criterion 2.6. Furthermore, alignment with local authorities was evidenced in joint fire drills. An extensive risk scenario planning was undertaken by the site and the fire brigade of Singen as well as workers, were consulted. Crisis organisation, communication guidelines and yearly trainings were further evidenced by the site during the audit.</p>

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	Amcor implemented due diligence processes regarding mergers and acquisitions which take into account environmental, social and governance aspects. The process includes stage reviews for evaluation, preliminary assessment as well as onsite assessments.
2.8 Closure, Decommissioning and Divestment	Conformance	Amcor developed and implemented policies, systems, procedures and processes that conform to the closure, decommissioning and divestment requirements. Processes were implemented for the environmental impact assessment and mitigation measures, social planning and records for stakeholder consultation were in place.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>Amcor has publicly disclosed its governance approach and its material environmental, social and economic impacts. 2018 Amcor Sustainability Review and GRI report are publically available following the links below.</p> <p>https://assets.ctfassets.net/f7tuvt85vtoa/2EkF2w9NlScqM6uocc0ccU/c738eec8ef4e6a7ad9796594bd2c34b9/Amcor_2018_Sustainability_Review_short_form_-_Final.pdf</p> <p>https://assets.ctfassets.net/f7tuvt85vtoa/lapnuToUbAU8yaiQg24cA/0f7fd5e05ea1034b6305dff8ba8f4329/Amcor_Sustainability_Report_2018.pdf</p> <p>Amcor's Sustainability report 2018 was assured by EY. Please find below a link to their assurance statement:</p> <p>https://amcor-sustainability-review.com/content/media/2018/10/Amcor_Appendix_Exhibit_05.pdf</p>
3.2 Non-compliance and liabilities	Conformance	<p>Amcor provides information on non-compliances and liabilities in its annual sustainability report. Please see below:</p> <p>https://assets.ctfassets.net/f7tuvt85vtoa/2EkF2w9NlScqM6uocc0ccU/c738eec8ef4e6a7ad9796594bd2c34b9/Amcor_2018_Sustainability_Review_short_form_-_Final.pdf</p> <p>https://assets.ctfassets.net/f7tuvt85vtoa/lapnuToUbAU8yaiQg24cA/0f7fd5e05ea1034b6305dff8ba8f4329/Amcor_Sustainability_Report_2018.pdf</p>

CRITERION	RATING	COMMENT
		In FY18, Amcor remained materially compliant with all environmental laws and regulations across the 40+ countries in which it operates.
3.3a Payments to governments (legal and contractual)	Conformance	Payments to governments are regularly reviewed and financial accounts are audited by PwC Germany.
3.3b Payments to governments (disclosure – bauxite mining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.4 Stakeholder complaints, grievances and requests for information	Conformance	<p>Amcor has a third-party operated Whistleblower Service which is available in every country where Amcor operates in the local language, thus takes cultural aspects into consideration. The service is available at Amcor's global website: https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html.</p> <p>Complaints are investigated by the Whistleblower Committee which consists of senior representatives from Group Legal, HR and Internal Audit. Complaints and grievances are regularly monitored and evaluated. Amcor Singen implemented local measures to increase awareness of existing reporting mechanisms both for internal and external stakeholders.</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>Amcor evaluates Environmental Life Cycle Assessment (LCA) information for all product lines for which Aluminium is considered and used. 2028 products using aluminium foil and 134 products using aluminium sheet have completed Environmental Life Cycle Assessments. 531 products from Amcor Singen have been evaluated. The methodology has also been certified by Carbon Trust. As per the certification, the model is compliant with PAS25050, GHG Product Standard, ISO14011:2006 and ISO14046:2014. For more information, please visit: https://www.amcor.com/product-listing/asset</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	<p>Amcor provides both cradle-to-gate and cradle-to-grave Life Cycle Assessment (LCA) information on its Aluminium (containing) products to customers upon request. Amcor has developed robust life cycle assessment management systems, such as ASSET and</p>

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		<p>procedures to provide this information to customers upon request. Further information can be found on the website: https://www.amcor.com/product-listing/asset</p>
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	<p>Amcor does not publicly communicate LCA information. LCA information is available upon request following the link below: https://www.amcor.com/about/media-centre/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game</p>
4.2 Product design	Conformance	<p>Amcor developed and implemented policies, systems, procedures and processes that conform to the ASI Performance Standard's product design requirements. Further information on the Entity's product design approach can be found here: https://amcor-sustainability-review.com/products/#innovation</p>
4.3a Aluminium Process Scrap (targets)	Conformance	<p>Amcor Singen implemented policies, procedures and systems to meet the ASI Performance Standard criteria related to Aluminium Process Scrap. When scrap is generated, the site collects 100% of the scrap for recycling or reuse. The site has established alloy separation guidelines for departments. The Aluminium Process Scrap is sold to third parties by alloy grade. Amcor Singen established targets to minimise the generation of Aluminium Process Scrap below 10% of the production volume and demonstrated initiatives to reach this target.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Amcor Singen developed processes to separate Aluminium alloys and grades for recycling. This was evidenced in corporate guidelines and by observations seen during the site tour.</p>
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	<p>Amcor released a pledge in January 2018 to develop all its packaging to be recyclable or reusable by 2025. This makes Amcor the first packaging company to make such a commitment. Amcor worked with Ellen MacArthur Foundation to develop baseline definitions for its targets and measurement system against this pledge. Amcor demonstrated a number of initiatives to assess material flows and enhance the recyclability of its products, working with multiple stakeholders. Further details can be found via the link below:</p>

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		https://www.amcor.com/sustainability
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	Amcor engaged with local, regional, national and global stakeholders to increase the collection and recycling of products containing aluminium at end-of-life. Amcor is working closely with a number of partners, such as Ellen MacArthur Foundation (EMF), World Food Programme (WFP) and Ocean Conservancy as well as other regional initiatives focused on implementing effective and efficient recycling, such as The Recycling Partnership, CEFLEX (A Circular Economy for Flexible), MRFF (Materials Recovery Facilities for the Future) and REDCycle. Further information is available in Amcor's Sustainability Report: https://www.amcor.com/sustainability

PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Conformance	Amcor publicly discloses material GHG emissions and energy use by source on an annual basis. Please see: https://amcor-sustainability-review.com/operations/#enviroaction Amcor is disclosing GHG emission and energy use data to Carbon Disclosure Project Climate Change platform.
5.2 GHG emissions reductions	Conformance	Amcor set a company-wide GHG emission reduction target at 6% Tonnes of CO _{2e} /production unit from FY 17 to FY 19. It has a 60% reduction target to 2030. Amcor Singen implemented a process for energy efficiency improvements. The information of the reduction target is disclosed on the company's EnviroAction section of its sustainability website: https://amcor-sustainability-review.com/operations/
5.3a Aluminium Smelting (management system)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3b Aluminium Smelting (up to and including 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.3c Aluminium Smelting (after 2020)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

PRINCIPLE 6 EMISSIONS, EFFLUENTS AND WASTE

CRITERION	RATING	COMMENT
6.1 Emissions to Air	Conformance	Amcor Singen has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's air emissions requirements and is in compliance with the legal permit thresholds on air emissions. Main sources of emissions to air include Amcor Singen's rolling, conversion processes and emissions attributed to rolling oil.
6.2 Discharges to Water	Conformance	Amcor Singen has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's discharges to water requirements. Amcor Singen obtained ISO 14001 certificate and is compliant with legal requirements on water discharges. Industrial water discharge treatment facility is operated onsite.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. Controls were reviewed to prevent contamination of air, soil and water due to major spills and leakages. No such incidents were reported in 2018.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. The site's controls and external communication plan are detailed in its emergency response plan and are regularly reviewed.
6.4a Reporting of Spills (immediate disclosure)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. Amcor Singen obtained ISO 14001 certificate. No uncontrolled spills or leakage events in 2017/18.
6.4b Reporting of Spills (regular reporting)	Conformance	No uncontrolled incidents of Spills and Leakage were noted since Amcor Singen joined ASI.
6.5a Waste management and reporting (strategy)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's waste management and reporting requirements.

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		Amcor published its waste information (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction
6.5b Waste management and reporting (disclosure)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's waste management and reporting requirements. Amcor published its company-wide waste information (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction
6.6a Bauxite Residue (storage construction)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6b Bauxite Residue (integrity checks and controls)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6c Bauxite Residue (water discharge)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6d Bauxite Residue (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6e Bauxite Residue (start of the art technologies)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.6f Bauxite Residue (remediation)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7a Spent Pot Lining (SPL) (storage and management)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7b Spent Pot Lining (SPL) (recovery and recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7c Spent Pot Lining (SPL) (Untreated SPL)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7d Spent Pot Lining (SPL) (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.7e Spent Pot Lining (SPL) (marine and aquatic environments)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8a Dross (recovery)	Not Applicable	This criterion is not applicable to the Entity's certification scope.

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6.8b Dross (recycling)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
6.8c Dross (review of alternatives)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
PRINCIPLE 7 WATER STEWARDSHIP		
7.1a Water assessment (mapping)	Conformance	Amcor Singen identified and mapped its water withdrawal and use by source and type. The site has undertaken a water balance analysis and identified major sources of water input.
7.1b Water assessment (risk assessment)	Conformance	Amcor Singen completed a water risk assessment and demonstrated legal compliance with regards to water usage.
7.2a Water management (management plans)	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. The site identified multiple opportunities to save water, including saving cooling water and saving water through machine upgrades in degreasing/anodizing process. More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction
7.2b Water management (monitoring)	Conformance	Amcor Singen regularly monitors the implementation of the water management plan and reports water input and output information regularly to Group level.
7.3 Disclosure of water usage and risks	Conformance	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction Furthermore, Amcor is disclosing water usage and water risks to the Carbon Disclosure Project Water platform.
PRINCIPLE 8 BIODIVERSITY		
8.1 Biodiversity assessment	Conformance	Biodiversity risk assessment was carried out which considers the site's operations and area of influence. The study was carried out by the local authority in collaboration with local environmental associations in the City of Singen

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		and in its surroundings. The report concludes that the site does not have material impacts on biodiversity areas and populations. Amcor Singen integrated biodiversity aspects into its management system.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	As there were no material impacts identified in the assessment conducted under Criterion 8.1, a Biodiversity Action Plan is not required under Criterion 8.2.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	As there were no material impacts identified in the assessment conducted under Criterion 8.1, a Biodiversity Action Plan is not required under Criterion 8.2.
8.2c Biodiversity management (reporting)	Not Applicable	As there were no material impacts identified in the assessment conducted under Criterion 8.1, a Biodiversity Action Plan is not required under Criterion 8.2.
8.3 Alien Species	Conformance	Amcor Singen established internal processes to prevent accidental or deliberate introduction of alien species. This includes instructions for suppliers to treat wooden pallets according to international standards, such as ISPM No. 15.
8.4a Commitment to “No Go” in World Heritage properties (exploration and new mines)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.4b Commitment to “No Go” in World Heritage properties (existing operations)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5a Mine rehabilitation (best available techniques)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
8.5b Mine rehabilitation (financial provisions)	Not Applicable	This criterion is not applicable to the Entity’s certification scope.
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	Amcor’s Code of Conduct and Ethics Policy is regularly reviewed and communicated conforming to ASI Performance Standard requirements.
9.1b Human Rights Due Diligence (process)	Minor Non-Conformance	Amcor implemented a Corporate Code of Conduct and Ethics Policy that covers the policy-level commitment to respect Human Rights. Amcor has also issued a Modern

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		<p>Slavery statement in 2017 (please find link below: https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf</p> <p>However, Amcor Singen has not undertaken a Human Rights Due Diligence process that seeks to identify, prevent, mitigate and account for how it addresses its actual and potential impacts on Human Rights. This process should evaluate salient human rights risk which should go beyond focusing on identifying and managing material risks to the company itself. The human rights due diligence must also assess risks and impacts to rightsholders – such as customers, employees, communities, Indigenous Peoples and other stakeholders. We noted that Amcor Singen completed Sedex/SMETA audit in April 2019 and no non-conformances were found. Amcor Singen demonstrated legal compliance on human rights requirements according to German law.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	Amcor operates a Whistleblower Policy and independent Whistleblower Service that enables employees and external stakeholders to report anonymously potential modern slavery related concerns and other breaches of the Code of Conduct and Ethics Policy or Supplier Code of Conduct.
9.2 Women's Rights	Conformance	<p>Amcor implements initiatives to increase gender diversity within the company. Amcor is reporting publicly on gender diversity indicators such as the number of female/male workers and male/female senior managers. More information about Amcor's Talent through Diversity policy can be found below: https://assets.ctfassets.net/f7tuyt85vtoa/21v1llh0xmoW88CGowuGWO/60b3e08c2357c0fce04b9e79f197f66b/Talent-through-Diversity-Policy.pdf</p>
9.3 Indigenous Peoples	Not Applicable	This criterion does not apply as Indigenous Peoples or their lands, territories and resources have not been present.
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	This criterion does not apply as Indigenous Peoples or their lands, territories and resources have not been present.

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This criterion does not apply as no cultural heritage sites have been identified.
9.6a Resettlements (avoid or minimise)	Not Applicable	This criterion does not apply as no resettlements took place.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion does not apply as no resettlements took place.
9.7a Local Communities (rights and interests)	Conformance	Amcor Singen implemented an interested party, external communication procedure which identified relevant stakeholders, their rights and their interest. Consequent communication plans are put in place. The site also raised awareness of channels available to local communities and neighbours to contact the site.
9.7b Local Communities (impacts)	Conformance	Amcor Singen implemented an interested party, external communication procedure which identified relevant stakeholders, their rights and their interest. Consequent communication plans are put in place. Channels available to community members, neighbours or visitors to report complaints or grievances are advertised by the site on posters, notice boards, website as well as the visitor introduction video. The local community recognises Amcor Singen as part of the business community and a major employer in the local area.
9.7c Local Communities (livelihoods)	Conformance	Amcor Singen supports local charitable organisations with an annual community investment fund.
9.8 Conflict-Affected and High-Risk Areas	Conformance	Amcor Singen operates a conflict minerals due diligence process. Furthermore, Amcor undertakes an EcoVadis supply chain risk assessment which identifies high-risk suppliers from a human rights perspective and the Company implemented adequate mitigation measures. Conflict affected and high-risk areas are included as a screening criterion in the risk assessment.
9.9 Security practice	Not Applicable	The criterion does not apply as Amcor Singen does not directly employ security personnel.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Amcor Singen respects the rights of workers to unite freely, seek representation and join the works councils without interference.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Amcor Singen respects the rights of workers to unite freely in the unions, seek representation and join the works councils without interference.
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	Amcor Singen developed and implemented policies, systems, procedures and processes that conform to these Freedom of Association and Right to Collective Bargaining requirements. The Entity respects the rights of workers to unite freely in the unions, seek representation and join the works councils without interference.
10.2a Child Labour (minimum age)	Conformance	Amcor Singen does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law. The age of workers is regularly checked as part of their onboarding process.
10.2b Child Labour (hazardous)	Conformance	Amcor Singen does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law including. Amcor Singen is not engaging in or supporting Hazardous Child Labour.
10.2c Child Labour (worst forms)	Conformance	Amcor Singen does neither use nor support the use of child labour as defined in ILO Conventions C138 and C182, and does comply with related national and international law. The Entity is not engaging in or supporting worst forms of child labour. Amcor requires its suppliers to respect all laws in their jurisdiction with regards to child labour. Please see Amcor's Modern Slavery statement: https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf
10.3a Forced Labour (human trafficking)	Conformance	Amcor Singen does neither engage in nor support the use of forced labour as defined in ILO Conventions C29, along with protocol P29 (2014) to this Convention, and C105. Amcor Singen does not engage in or support human trafficking either directly or through any employment or recruitment agencies. Please see Amcor's Modern Slavery Statement: https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf

CRITERION	RATING	COMMENT
10.3b Forced Labour (deposits, fees, advances)	Conformance	Amcor Singen developed, implemented and maintains systems, policies and procedures to conform with ASI Performance Standard requirements related to forced labour. Worker interviews confirmed that no recruitment fee or deposit is required.
10.3c Forced Labour (migrant workers)	Conformance	Amcor Singen developed, implemented and maintains systems, policies and procedures to conform with ASI Performance Standard requirements related to forced labour. It does not require migrant workers to lodge deposits.
10.3d Forced Labour (debt bondage)	Conformance	Amcor Singen developed, implemented and maintains systems, policies and procedures to conform with ASI Performance Standard requirements related to forced labour.
10.3e Forced Labour (freedom of movement)	Conformance	Amcor Singen developed, implemented and maintains systems, policies and procedures to conform to the ASI Performance Standard requirements related to forced labour. The site does not restrict the free movement of workers as confirmed by worker interviews.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Amcor Singen has developed, implemented and maintains systems, policies and procedures that conform to the ASI Performance Standard requirements related to forced labour. It does not confiscate worker's original identification documents. Copies of these are kept on personal files.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Amcor Singen developed, implemented and maintains systems, policies and procedures that conform to the ASI Performance Standard requirements related to forced labour.
10.4 Non-Discrimination	Conformance	Amcor Singen has developed, implemented and maintained systems, policies and procedures that conform to ASI Performance Standard requirements related to non-discrimination. Please see Amcor's Corporate Code of Conduct and Ethics Policy for further detail: https://assets.ctfassets.net/f7tuyt85vtoa/2li3tufMugU4MMgIksOqMA/c838a0ae757273ddd99f28c827537942/Code-of-Conduct-approved-by-the-board.pdf
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, Amcor Singen ensures open

CRITERION	RATING	COMMENT
		communication and direct engagement with workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without threat of reprisal, intimidation or harassment (e.g. team briefings, infoboard, meetings with worker representatives).
10.6 Disciplinary practices	Conformance	Amcor Singen developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Disciplinary practices. The Entity operates a Whistleblower Policy and an independent hotline for confidential reporting: https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyl3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf
10.7a Remuneration (living wage)	Conformance	Amcor Singen developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration.
10.7b Remuneration (method of payment)	Conformance	Amcor Singen developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Remuneration.
10.8 Working Time	Conformance	Amcor Singen developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Working hours.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.1.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.1.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.1.

CRITERION	RATING	COMMENT
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Amcor Singen developed, implemented and maintained systems, policies and procedures that conform to the ASI Performance Standard requirements related to Occupational Health and Safety (OH&S) Policy (right to stop unsafe work). The site obtained ISO 45001 certifications which is recognised by ASI as meeting Performance Standard criterion 11.1.
11.2 OH&S Management System	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.2.
11.3 Employee engagement on health and safety	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.3.
11.4 OH&S performance	Conformance	Amcor Singen obtained ISO 45001 certificate for Occupational Health and Safety Management System, which is recognised by ASI as meeting Performance Standard criterion 11.4.