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# ASI CERTIFICATION CHAIN OF CUSTODY STANDARD

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PRESENTED TO

# AMCOR

CERTIFICATE  
NUMBER

15

ASI  
STANDARD

CHAIN OF CUSTODY  
(V1 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 white ink on a dark grey background.

Aluminium Stewardship Initiative Ltd  
ACN 606 661 125, Australia  
info@aluminium-stewardship.org

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CERTIFICATION SCOPE

Amcor Flexibles Chain of Custody certification for  
the Singen site (Germany).

*Validity of this Certificate is subject to continued  
conformance with the applicable ASI Standard  
and can be verified at [www.aluminium-  
stewardship.org](http://www.aluminium-stewardship.org)*

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# SUMMARY AUDIT REPORT

## CHAIN OF CUSTODY

## STANDARD

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### OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles Singen
CERTIFICATION SCOPE	Amcor Flexibles Chain of Custody certification for the Singen site (Germany).
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none"><li>• Post-Casthouse</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>• Chain of Custody Standard V1</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>• Certification Audit</li></ul>
AUDIT FIRM	DNV GL
AUDIT DATE	28 September 2019, 29 October 2018 2 April 2019 (follow-up desktop audit)
AUDIT REPORT SUBMISSION	18 December 2019 (Initial Audit Report) 13 May 2019 (Re-submitted Audit Report following desktop audit)
AUDIT SCOPE	<p>The audit scope covered the Amcor Flexibles Singen site (Germany) and CoC activities managed at the Amcor Flexibles head office (Zurich, Switzerland).</p> <p>Supply chain activities included in the audit scope:</p> <ul style="list-style-type: none"><li>• Post-Casthouse</li></ul> <p>Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p>
AUDIT OUTCOME	<ul style="list-style-type: none"><li>• Certification</li></ul>
AUDIT METHODOLOGY DECLARATION	<p>The Auditors confirm that:</p> <ul style="list-style-type: none"><li><input checked="" type="checkbox"/> The information provided by the Entity is true and accurate to the best knowledge of the Auditor(s) preparing this report.</li><li><input checked="" type="checkbox"/> The findings are based on verified Objective Evidence relevant to the time period for the Audit, traceable and unambiguous.</li></ul>

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- 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.
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CERTIFICATION PERIOD	23 May 2019 – 22 May 2022
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NEXT AUDIT TYPE	Surveillance Audit
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NEXT AUDIT DUE DATE	20 November 2020
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CERTIFICATION NUMBER	15
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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Amcor (parent company of the Amcor Flexibles Singen) is an active ASI member. <a href="https://aluminium-stewardship.org/about-asi/asi-members/amcor/">https://aluminium-stewardship.org/about-asi/asi-members/amcor/</a>
1.2 Management system	Conformance	Amcor Singen established policies, systems, procedures and processes that can comply with ASI CoC criteria regarding a management system. The management system we observed has the capacity to handle ASI CoC material. The existing procedure describes in the detail the site's management system, responsibilities, functions, processes and workflows, documentation and record retention and handling of non-conforming product deliveries. Amcor Singen has an integrated management system underpinned by ISO 9001. The site's ISO 9001 certificate was issued by SQS and is valid for the certification period.
1.3 Management system reviews	Conformance	Amcor Singen established mechanisms for the periodic review of the Management System, in line with their ISO 9001 certification.
1.4 Management representative	Conformance	The site has nominated Plant General Manager of Amcor Singen to have overall responsibility of the implementation of ASI CoC and defined roles and responsibilities to manage the Chain of Custody system (including Quality management department, Supplier management department, Customer service and other relevant departments.)
1.5 Training	Conformance	Amcor Singen delivered training to relevant personnel to raise awareness of ASI CoC requirements this year. Amcor Singen has further plans to implement training measures that make relevant personnel aware of and competent in their responsibilities under the CoC Standard, once ASI certified material is available.
1.6 Record keeping	Conformance	Amcor Singen maintains up-to-date records (Management System) covering all applicable requirements of the CoC Standard. The site's procurement system defines the retention time as required by the ASI CoC Standard.
1.7a Reporting to ASI (Inputs and Outputs)	Not Applicable	Not applicable for first Certification Audit.

CRITERION	RATING	COMMENT
1.7b Reporting to ASI (Input Percentage)	Not Applicable	Not applicable for first Certification Audit.
1.7c Reporting to ASI (Positive Balance)	Not Applicable	Not applicable for first Certification Audit.
1.7d Reporting to ASI (Internal Overdraw)	Not Applicable	Not applicable for first Certification Audit.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	Not applicable for first Certification Audit.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	Not applicable for first Certification Audit.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	Not applicable for first Certification Audit.
<b>2 OUTSOURCING CONTRACTORS</b>		
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Amcor Singen will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2a Control of CoC Material	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2b No further outsourcing	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.2c Risk assessment	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.3 Output Quantity	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.4 Verification and record-keeping	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
2.5 Error management	Not Applicable	The site will not use outsourcing contractors for the purposes of further processing, treatment or manufacturing.
<b>3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL</b>		
3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's certification scope.

CRITERION	RATING	COMMENT
3.1b ASI Performance Standard – Bauxite Mining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.2a CoC Certification Scope – Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.2b ASI Performance Standard – Alumina Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.3a CoC Certification Scope – Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's certification scope.
3.3b ASI Performance Standard – Aluminium Smelting	Not Applicable	This criterion is not applicable to the Entity's certification scope.
<b>4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL</b>		
4.1a CoC Certification Scope – Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.1b ASI Performance Standard – Aluminium Re-Melting/Refining	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.2a Pre-Consumer Scrap and Dross	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.2b Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3a Supplier records	Not Applicable	This criterion is not applicable to the Entity's certification scope.
4.3b Cash payments	Not Applicable	This criterion is not applicable to the Entity's certification scope.
<b>5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM</b>		
5.1a CoC Certification Scope – Casthouses	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.1b ASI Performance Standard – Casthouses	Not Applicable	This criterion is not applicable to the Entity's certification scope.
5.2 Casthouse Products	Not Applicable	This criterion is not applicable to the Entity's certification scope.
<b>6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM</b>		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Amcor has systems in place to ensure that its producing ASI Aluminium only from an Entity and/or facility/ies. In addition, Amcor also demonstrated leadership initiatives and drove capacity building efforts in key supply chains and helped a number of Value Chain Partners from bauxite mine to semi-

CRITERION	RATING	COMMENT
		fabrication to get ready for the new ASI Standard. Press release can be found below: <a href="https://packagingeurope.com/sig-and-amcor-push-responsible-aluminium-sourcing-further/">https://packagingeurope.com/sig-and-amcor-push-responsible-aluminium-sourcing-further/</a>
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Amcor Singen has achieved certification to the ASI Performance Standard which was in process at the time of the site visit for this audit.
6.1c Sourcing ASI Aluminium	Conformance	Amcor's operating procedures and strategic plans with future ASI certified suppliers will secure the supply and production of ASI CoC materials.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Amcor developed a Suppliers Code of Conduct covering the ASI CoC criteria of anti-corruption. A copy of the Suppliers Code of Conduct can be found on the company's website: <a href="https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf">https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</a>
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Amcor established a responsible sourcing policy and has initiatives in place to ensure the policy is implemented. For instance, Amcor is undertaking EcoVadis risk assessment of key strategic suppliers. It is also conducting second party audits covering sustainability indicators.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	Amcor's Supplier Code of Conduct addresses human rights elements, such as non-discrimination, child labour, forced labour and freedom from harassment as they relate to international labour standards. Supplier Code of Conduct is available below: <a href="https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf">https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWlsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</a> Furthermore, Amcor also undertakes a regular EcoVadis supplier risk assessment and implemented appropriate mitigation measures.
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	Amcor has undertaken an EcoVadis supplier risk assessment, which considers risk profiles of countries based on risk criteria, which includes Health, Social, Corruption, Human rights and Environment indicators. Amcor implemented mitigation measures adequate to the risk ratings. 70% of Amcor's most important (strategic and critical) suppliers have been assessed which equals to 85% of Amcor's global procurement spend.

CRITERION	RATING	COMMENT
7.2 Risk assessment	Conformance	Amcor undertakes EcoVadis risk assessments of all its strategic, critical and core suppliers and completes risk mitigation efforts where relevant. Procurement colleagues are trained on how to use the EcoVadis assessment in their purchasing decisions and managing supplier relationships. Amcor also conducts second party audits of its supply chain. Amcor in cooperation with SIG Combibloc are leading efforts to increase the responsible sourcing of aluminium. Further information can be found via the link below: <a href="https://www.sig.biz/en/media/press-releases/sig-and-amcor-push-responsible-aluminium-sourcing-further">https://www.sig.biz/en/media/press-releases/sig-and-amcor-push-responsible-aluminium-sourcing-further</a>
7.3 Complaints mechanism	Conformance	Amcor's Whistleblower Policy and independent Whistleblower Service 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. Please find below link to access Amcor's Whistleblower Policy: <a href="https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyl3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf">https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyl3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf</a>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	Amcor Singen established a Material Accounting System that can record Input Quantity and Output Quantity of CoC Material and Non-CoC Material, by mass which will conform to ASI CoC requirement. These include SAP and Hydra systems in use. Planned process for ASI CoC/Material Planning was reviewed during the audit.
8.2a Post-Consumer Scrap	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.2b Pre-Consumer Scrap (total)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.2c Pre-Consumer Scrap (Eligible Scrap)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.3 Material Accounting Period	Conformance	The Material Accounting Period is defined as 12 months, in accordance with Amcor's financial year.
8.4 Input Percentage	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI CoC requirements. At the time of the audit, there were no examples of



CRITERION	RATING	COMMENT
		effective implementation of the system as no ASI CoC material was available on the market.
8.5 Input Percentage (Aluminium Re-Melting and Refining)	Not Applicable	This criterion is not applicable to the Entity's certification scope.
8.6 Output Quantity determination	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI CoC requirements. However, the effectiveness of this calculation could not be checked due to no CoC material available on the market.
8.7 Output Quantity designation	Conformance	Amcor's output quantity can be designated as 100% CoC material as per Material Account System procedures and processes. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	At present Amcor Singen does not intend to determine waste material as ASI pre-consumer scrap.
8.9 Outputs not exceed inputs	Conformance	Amcor Singen's accounting system is developed to have updated information on inventory balance on a frequent basis which conforms to the ASI Chain of Custody Standard requirement. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
8.10a Internal Overdraws (not exceed 20%)	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
8.10b Internal Overdraws (not exceed affected amount)	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
8.10c Internal Overdraws (period to make up)	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.

CRITERION	RATING	COMMENT
8.11a Positive Balance (carry over)	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
8.11b Positive Balance (expiry)	Conformance	Amcor Singen established a Material Accounting system in compliance with ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	Amcor Singen has a system that can produce shipment and transfer of CoC documents, ensuring that these are controlled, issued and stored as per ASI Chain of Custody Standard requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2a Date of issue	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2b Reference number	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2c Issuing Entity	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2d Receiving customer	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2e Responsible employee	Conformance	Amcor Singen identified responsible employees to verify information on CoC document. At the time of the audit, there were no examples of effective

CRITERION	RATING	COMMENT
		implementation of the system as no ASI CoC material was available on the market.
9.2f Conformance statement	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2g Type of CoC Material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2h Mass of CoC Material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.2i Mass of total material	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.3a Sustainability Data (optional)	Not Applicable	Amcor Singen is not planning on filling out the sustainability data as Amcor communicates on a Group level with regards to its sustainability data and not site-level.
9.3b Sustainability Data (passing on)	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.3c Post-Casthouse ASI Certification status	Not Applicable	Post-Casthouse Performance Standard certificate can be shared with clients once it is achieved. Please note the Entity is going through the certification process at the time of this audit.
9.4 Supplementary Information (optional)	Conformance	Amcor Singen will issue information on invoice documents as required by ASI Chain of Custody Standard. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
9.5 Response to verification requests	Conformance	We observed Amcor Singen's current SAP system has the capacity to store delivery papers and corresponding Purchase Orders. ASI certificate can

CRITERION	RATING	COMMENT
		be stored on the corresponding file. Quality Assurance Team will respond to requests for verification of information in CoC Documents issued by Amcor Singen.
9.6 Error management	Conformance	Amcor Singen will integrate error management with its current processes under ISO 9001. We observed the operation of its Knowledge Management System, which appeared to be robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	Amcor Singen will implement the developed verification steps of received CoC documents as required by ASI Chain of Custody Standard. We observed how foil stock information is currently entered into systems and the potential processing of received CoC documents was discussed at the management interview. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
10.2 Verify consistency with shipments	Conformance	Amcor Singen established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
10.3 Verify supplier CoC Certification status	Conformance	Amcor appeared to have planned robust processes to ensure suppliers have a valid ASI certificate and trigger adequate processes if any changes occur to their status. The process will be managed by central procurement function.
10.4 Error management	Conformance	Amcor Singen will integrate error management with its current processes under ISO 9001. We observed the operation of its Knowledge Management System, which appeared to be robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody criteria.
11 MARKET CREDITS SYSTEM: ASI CREDITS		
11.1a Material Accounting System – allocation	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.

CRITERION	RATING	COMMENT
11.1c No double counting	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.1d No Positive Balance for ASI Credits	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2a Date of issue	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2b Reference number	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2d Receiving Entity	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2e Conformance statement	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.2g Quantity	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3b Material Accounting System – purchasing	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3c Expiry	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3d No re-trading	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Not applicable as Amcor Singen does not intend to utilise the ASI market credits system.
<b>12 CLAIMS AND COMMUNICATIONS</b>		
12.1a ASI Claims Guide	Conformance	Amcor appointed roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. At the time of the audit, there

CRITERION	RATING	COMMENT
		were no examples of effective implementation of the system as no ASI CoC material was available on the market.
12.1b Verifiable evidence	Conformance	Amcor appointed roles and responsibilities to ensure that claims are made in a manner consistent with the ASI Claims Guide. At the time of the audit, there were no examples of effective implementation of the system as no ASI CoC material was available on the market.
12.1c Employee training	Conformance	Amcor Singen intends to deliver a training program for relevant employees once the CoC system is developed and fully designed. It will be linked to the entity's ISO9001 management system.