
ASI CERTIFICATION PERFORMANCE STANDARD



PRESENTED TO

AMCOR

CERTIFICATE
NUMBER

11

ASI
STANDARD

PERFORMANCE
STANDARD
(V2 2017)

CERTIFICATION
LEVEL

FULL
CERTIFICATION

ASI
ACCREDITED
AUDITOR

DNV GL

DATE OF ISSUE

16 SEPTEMBER 2019

DATE OF EXPIRY

15 SEPTEMBER 2022

CERTIFIED SINCE

16 SEPTEMBER 2019

AUTHORISED BY

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

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

*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 includes AF Rorschach site
(Switzerland) Development and Production of
Aluminium Packaging Systems.

SUMMARY AUDIT REPORT PERFORMANCE STANDARD

OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles Rorschach
CERTIFICATION SCOPE	Amcor Flexibles includes AF Rorschach site (Switzerland) Development and Production of Aluminium Packaging Systems.
SUPPLY CHAIN ACTIVITIES	<ul style="list-style-type: none">• Semi-Fabrication• Material Conversion• Aluminium Re-melting/Refining
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	13 – 14 September 2018 (initial site audit) 3 June 2019 (follow-up desktop audit)
AUDIT REPORT SUBMISSION	16 November 2018 (Initial Audit Report) 20 July 2019 (Re-submitted Audit Report following desktop audit)
AUDIT SCOPE	Audit scope covers Amcor Flexibles including the AF Rorschach site (Switzerland) 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• Material Conversion• Aluminium Re-melting/Refining
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

16 September 2019 – 15 September 2022

NEXT AUDIT
TYPE

Surveillance Audit

NEXT AUDIT
DUE DATE

15 March 2021

CERTIFICATE
NUMBER

11

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's legal compliance requirements. The Entity has systems in place to maintain awareness of and to ensure compliance with applicable law. The Entity holds ISO 14001 and OHSAS 18001 certifications from an accredited certification body. Amcor Flexibles Headquarters (referred to as Amcor Flexibles HQ) supports the site with legal council.
1.2 Anti-Corruption	Conformance	Amcor Rorschach works against corruption in all its forms, including extortion and bribery, consistent with applicable law and prevailing international standards. Among the instruments, there are Policies, Training, Guidelines, Risk Assessments. More information can be found via the link below: Amcor Sustainability Report 2018
1.3 Code of Conduct	Conformance	Amcor Rorschach has implemented a code of conduct including principles relevant to environmental, social and governance performance. Amcor's group code of conduct can be accessed via the link below: Amcor Code of Conduct
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	Amcor Rorschach has implemented and maintains policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. Amcor Rorschach holds ISO 14001 certification which is current for the Entity's certification scope. More information can be found via the link below: Amcor Sustainability Report 2018
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	In accordance with the ASI Performance Standard as well as their Environmental and Health & Safety Management System, Amcor Rorschach have senior management endorsement and support through provision of resources and regularly review the policies. Amcor Rorschach obtained ISO 14001 and

CRITERION	RATING	COMMENT
		OHSAS 18001 certifications which are consistent with their ASI certification scope.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	Amcor Rorschach has communicated the policies internally and externally as appropriate (company website, intranet). Their Code of conduct is actively communicated to their business partners, especially suppliers.
2.2 Leadership	Conformance	Amcor Flexibles HQ has a nominated 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.
2.3a Environmental and Social Management Systems (environmental)	Conformance	Amcor Rorschach has documented and implemented an accredited Environmental Management System according to ISO 14001.
2.3b Environmental and Social Management Systems (social)	Conformance	Amcor Rorschach has documented and implemented an accredited H&S management system (OHSAS 18001) and a verified social management system (in line with SMETA requirements).
2.4 Responsible Sourcing	Conformance	Responsible sourcing elements are managed by Amcor AF EMEA Procurement organisation. It has developed and implemented policies, systems, procedures and processes that conform to the responsible sourcing requirements. The Entity has implemented a Supplier Code of Conduct, 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.
2.5 Impact Assessments	Conformance	No new projects or major changes to existing facilities took place since Amcor Rorschach has joined ASI.
2.6 Emergency Response Plan	Conformance	Amcor Rorschach has a site specific emergency response plan developed in collaboration with relevant stakeholders such as the community, workers and their representatives, and relevant authorities. Amcor Rorschach also holds ISO 14001 and OHSAS 18001 certifications which are current to the Entity's certification scope under ASI.

CRITERION	RATING	COMMENT
2.7 Mergers and Acquisitions	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to the mergers and acquisitions requirements.</p> <p>The Entity demonstrated procedures, including stage reviews for evaluation, preliminary assessment as well as onsite assessment for mergers and acquisitions that conform to ASI Performance Standard requirements. The Entity implements the due diligence processes.</p>
2.8 Closure, Decommissioning and Divestment	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to the closure, decommissioning and divestment requirements. The Entity's processes were implemented for the environmental impact assessment and mitigation measures, social planning and records for stakeholder consultation were in place.</p>
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	<p>Amcor AF EMEA is responsible for Sustainability Reporting. Amcor has publicly disclosed its governance approach and its material environmental, social and economic impacts. The 2018 Amcor Sustainability Review and GRI report are publicly available following the links below:</p> <p>2018 Amcor Sustainability Review Amcor Sustainability Report 2018</p>
3.2 Non-compliance and liabilities	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to the non-compliance and liabilities requirements. The Entity provides information on non-compliances and liabilities in its annual sustainability report. Please see below:</p> <p>2018 Amcor Sustainability Review Amcor Sustainability Report 2018</p> <p>In FY18, Amcor remained materially compliant with all environmental laws and regulations across the 40+ countries in which it operates.</p>
3.3a Payments to governments (legal and contractual)	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to anti-corruption requirements related to payments to</p>

CRITERION	RATING	COMMENT
		governments and facilitation of payments (among the instruments, there are Policies, Training, Guidelines, Risk Assessments; see. criterion 1.2).
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 Rorschach holds ISO 14001 certification which is current to the Entity's certification scope and as per ASI Assurance Manual, it can be accepted as meeting the ASI Standard requirements. Amcor Rorschach reviewed its internal grievance mechanism, assigned roles and responsibilities to handle any stakeholder complaints. The internal announcements about changes to the procedure are planned and are integrated into communication channels (e.g. welcome visitor video). Amcor also operates a Whistleblower Service which is open to external stakeholders to report any issues, concerns or requests for information.</p> <p>https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html</p>
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's life cycle assessment (LCA) requirements. The Entity has evaluated the life cycle impacts of its major product lines. More information can be found via the links below:</p> <p>https://www.amcor.com/about/media-centre/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game</p>
4.1b Environmental Life Cycle Assessment (cradle to gate)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's life cycle assessment (LCA) requirements. The Entity's LCA data was available upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's LCA communication requirements. The information and the underlying assumptions are available on the company's website:

CRITERION	RATING	COMMENT
		https://www.amcor.com/about/media-centre/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game
4.2 Product design	Conformance	<p>The Entity has 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 Rorschach has developed and implemented policies, systems, procedures and processes to minimize the generation of Aluminium Process Scrap within its own operations and 100% of aluminium scraps are collected and treated separately.</p>
4.3b Aluminium Process Scrap (alloy separation)	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to these material stewardship requirements. Amcor Rorschach has an Aluminium Process Scrap (alloy separation) strategy which was confirmed by our document review and alloy separation was observed 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: https://www.amcor.com/sustainability</p>
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	<p>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</p>

CRITERION	RATING	COMMENT
		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 Rorschach developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's Disclosure of GHG emissions and energy use requirements. The Entity, through its parent company, has disclosed the GHG emissions and energy use. More information can be found via the link below: https://amcor-sustainability-review.com/operations/
5.2 GHG emissions reductions	Conformance	Amcor Rorschach developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's GHG emissions reductions requirements. The Entity, through its parent company, has published its GHG emission reduction information (called EnviroAction). More information can be found via the link below: 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		
6.1 Emissions to Air	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's air emissions requirements. The Entity's has an ISO14001 valid certificate, which is available upon request.
6.2 Discharges to Water	Conformance	The Entity has developed and implemented policies, systems, procedures and processes

CRITERION	RATING	COMMENT
		that conform to ASI Performance Standard's discharges to water requirements. The Entity's has an ISO14001 valid certificate, which is available upon request.
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. The Entity has an ISO14001 valid certificate, which is available upon request.
6.3b Assessment and Management of Spills and Leakage (management)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's assessment and management of spills and leakage requirements. The Entity's has an ISO14001 valid certificate, which is available upon request.
6.4a Reporting of Spills (immediate disclosure)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's reporting of spills requirements. The Entity's has an ISO14001 valid certificate, which is available upon request.
6.4b Reporting of Spills (regular reporting)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's reporting of spills requirements. The Entity's has an ISO14001 valid certificate, which is available upon request.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's waste management and reporting requirements. The Entity, through its parent company, has 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	The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's waste management and reporting requirements. The Entity, through its parent company, has

CRITERION	RATING	COMMENT
		published its 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.
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 Rorschach has developed and implemented policies, systems, procedures and processes that conform to ASI Performance

CRITERION	RATING	COMMENT
		<p>Standard's water assessment requirements. Amcor Rorschah, through its parent company, has published information related to water management (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction</p>
7.1b Water assessment (risk assessment)	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. Amcor Rorschach, through its parent company, has published information related to water management (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction</p>
7.2a Water management (management plans)	Conformance	<p>Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. Amcor Rorschach, through its parent company, has published its water management plan (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction</p>
7.2b Water management (monitoring)	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. The Entity, through its parent company, has published its waster information (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction</p>
7.3 Disclosure of water usage and risks	Conformance	<p>The Entity has developed and implemented policies, systems, procedures and processes that conform to ASI Performance Standard's water assessment requirements. The Entity, through its parent company, has published its waster information (EnviroAction). More information can be found via the link below: https://amcor-sustainability-review.com/operations/#enviroaction</p>

CRITERION	RATING	COMMENT
8.1 Biodiversity assessment	Conformance	<p>Amcor Rorschach carried out a biodiversity risk assessment which was based on third party independent analysis and considered the site's Area of Influence. The assessment concluded low levels of risk to biodiversity values as a result of the site's activities. The site has also integrated impacts on biodiversity values in its environmental aspect analysis and integrated monitoring plans into its environmental management system.</p> <p>As a packaging company, Amcor is party to multiple engagements which help deliver biodiversity benefits. This includes the Ocean Conservancy (initiating infrastructure projects in Asian markets) and the work through the Ellen MacArthur Foundation. Amcor participates in various local efforts such as the International Coastal Clean-Up events to raise awareness among employees and help community engagement. Amcor Flexibles is also one of the signatories for the New Plastics Economy. More information is available via: https://www.amcor.com/sustainability.</p>
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	<p>This criterion is Not Applicable as the biodiversity risk assessment concluded that Amcor Rorschach has no material biodiversity impacts. However, Amcor Rorschach implemented a biodiversity action plan, which identified areas where the site can contribute to biodiversity conservation. The action plan is integrated into the site's environmental management system and reviewed periodically.</p>
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	<p>This criterion is Not Applicable as the biodiversity risk assessment concluded that Amcor Rorschach has no material biodiversity impacts. However, Amcor Rorschach consulted an independent expert when undertaking the biodiversity risk assessment which was also informed by the canton municipality's overall biodiversity strategy.</p>
8.2c Biodiversity management (reporting)	Not Applicable	<p>The biodiversity risk assessment concluded that Amcor Rorschach has no material biodiversity impacts, and therefore reporting on biodiversity outcomes is not required.</p>
8.3 Alien Species	Conformance	<p>Amcor Rorschach integrated risk exposure from the introduction of invasive species in its environmental risk register. The site is taking</p>

CRITERION	RATING	COMMENT
		measures to mitigate against these risks, including changes to its supplier and transportation checks.
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	The Entity has issued a Code of Conduct which is communicated to internal and external stakeholders. Please see below link: Amcor Code of Conduct
9.1b Human Rights Due Diligence (process)	Conformance	<p>Amcor implemented a Code of Conduct that covers the policy-level commitment to respect Human Rights. The Amcor has also issued a Modern Slavery statement in 2017: https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf.</p> <p>Amcor Rorschach considered vulnerable groups (such as women, migrant workers, apprentices etc.) and adequate measures to mitigate these risks in its HR Management System. Furthermore, Amcor's 2017 Modern Slavery Statement confirms its approach to human rights. Amcor issued a Supplier Code of Conduct and asks its suppliers to submit due diligence information via EcoVadis. Amcor operates a Whistleblowing Service which has been communicated to employees as well as external stakeholders onsite in Rorschach. Locally, the site defined a grievance mechanism through which interested parties can report any issues or concerns. We note that Amcor Rorschach has completed Sedex SMETA audit with zero non-conformances and several good practices observed.</p>

CRITERION	RATING	COMMENT
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. Further details can be found via Amcor's Whistleblower Service line: https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html
9.2 Women's Rights	Conformance	Amcor Rorschach has developed and implemented policies, systems, procedures and processes that conform to the women's rights requirements. During the site tour, interviews and document review, no indication for discrimination of women was observed. The Entity is reporting publicly on gender diversity indicators such as the number of female/male workers and male/female senior managers.
9.3 Indigenous Peoples	Not Applicable	This criterion does not apply as indigenous peoples or their lands, territories and resources has been identified as not 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 has been identified as not present.
9.5 Cultural and sacred heritage	Not Applicable	This criterion does not apply as indigenous peoples or their lands, territories and resources has been identified as not present.
9.6a Resettlements (avoid or minimise)	Not Applicable	These criteria do not apply as resettlements are not being considered or taking place during the period since joining ASI or expected to occur during the Certification Period.
9.6b Resettlements (where unavoidable)	Not Applicable	This criterion does not apply as resettlements are not being considered or taking place during the period since joining ASI or expected to occur during the Certification Period.
9.7a Local Communities (rights and interests)	Conformance	The Entity respects the legal and customary rights and interests of local communities in their lands and livelihoods and their use of natural resources.
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on local

CRITERION	RATING	COMMENT
		community livelihoods resulting from its activities.
9.7c Local Communities (livelihoods)	Conformance	The Entity explores with local communities' opportunities to respect and support their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	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. Amcor also operates a conflict minerals due diligence process which considers conflict affected and high-risk areas.
9.9 Security practice	Conformance	Amcor Rorschach does not contribute to armed conflict or Human Rights abuses in Conflict-Affected and High-Risk Areas.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	Amcor Rorschach respects the rights of workers to unite freely in the unions, seek representation and join the works councils without interference.
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	Amcor Rorschach respects the rights of workers to collective bargaining. We noted that there is no collective agreement with regards to wages as it is not a legal requirement in Switzerland. Amcor Rorschach has set-up a system to determine the wages depending on job grade, individual performance and budget-increase (which is linked to general economic situation of the country).
10.1c Freedom of Association and Right to Collective Bargaining (alternative means)	Not Applicable	This criterion is not applicable as the entity does not operate in countries where applicable law restricts the right to freedom of association and collective bargaining.
10.2a Child Labour (minimum age)	Conformance	Amcor Rorschach does neither use nor support the use of child labour. Minimum working age of 15 years is respected. The youngest worker (apprentice) was 16 years old.
10.2b Child Labour (hazardous)	Conformance	Amcor Rorschach does neither use nor support the use of child labour and does not engage in or supporting hazardous child labour. Young workers are employed for educational purpose only. If at all, work with hazardous substances

CRITERION	RATING	COMMENT
		happens only under supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	Amcor Rorschach does neither use nor support the use of child labour and does not engage in or supporting worst forms of child labour.
10.3a Forced Labour (human trafficking)	Conformance	Amcor Rorschach does neither engage in nor support the use of forced labour. The entity does not engage in or support human trafficking either directly or through any employment or recruitment agencies. Please see Amcor's Modern Slavery Statement :
10.3b Forced Labour (deposits, fees, advances)	Conformance	Amcor Rorschach does neither engage in nor support the use of forced labour. The entity does not demand any form of deposit, recruitment fee or equipment advance from workers.
10.3c Forced Labour (migrant workers)	Conformance	Amcor Rorschach does neither engage in nor support the use of forced labour. The entity does not require migrant workers to lodge deposits or security payments at any time, as was confirmed by interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	Amcor Rorschach does not hold workers in debt bondage or force them to work in order to pay off a debt, as confirmed during site tour, by interviews and document review.
10.3e Forced Labour (freedom of movement)	Conformance	Amcor Rorschach does not unreasonably restrict the freedom of movement of workers in the workplace or in on-site housing, as confirmed during site tour, by interviews and document review.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	Amcor Rorschach does not retain original copies of workers' identity papers, work permits, travel documents or training certificates, as confirmed by interviews and document review.
10.3g Forced Labour (freedom to terminate employment)	Conformance	Amcor Rorschach does not deny workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, as confirmed by interviews and document review.
10.4 Non-Discrimination	Conformance	As confirmed by interviews and document review, Amcor Rorschach does ensure equal opportunities and does not engage in or support discrimination in hiring, salary, promotion,

CRITERION	RATING	COMMENT
		training, advancement opportunities or termination of any worker on the basis of gender, race, national or social origin, religion, disability, political affiliation, sexual orientation, marital status, family responsibilities, age, or any other condition that could give rise to discrimination.
10.5 Communication and engagement	Conformance	As confirmed by interviews and document review, Amcor Rorschach does ensure open 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 representation).
10.6 Disciplinary practices	Conformance	As confirmed by interviews, Amcor Rorschach does neither engage in nor tolerate verbal or physical violence or other harsh treatment of workers.
10.7a Remuneration (living wage)	Conformance	Amcor Rorschach does respect the rights of workers to a living wage and ensures that wages paid for a normal working week meet the industry standard.
10.7b Remuneration (method of payment)	Conformance	As confirmed by interviews and document review, Amcor Rorschach does make wage payments in a timely manner and in accordance with legal requirements. Workers are provided with pay slips.
10.8 Working Time	Conformance	Amcor Rorschach does comply with applicable law and industry standards on working time, public holidays and paid annual leave. A working time policy is in place and part of each employment contract. Clocking-in system is in place. Records are on hand.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	Amcor Rorschach is certified according to OHSAS 18001 by an accredited certification body therefore it is eligible for harmonization. Amcor Rorschach has implemented and communicated it's OHS policy as required by the ASI Performance Standard.

CRITERION	RATING	COMMENT
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	Amcor Rorschach has obtained OHSAS 18001 certification and is therefore eligible for harmonization. Amcor Rorschach does apply the policy to all workers and visitors present in any area or activities under its control. It is communicated internally and externally. Compliance with applicable law is periodically checked. Training is periodically conducted. Management regularly reviews the policy and procedures.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	Amcor Rorschach obtained OHSAS 18001 certificate which is current to the Entity's certification scope under ASI and is therefore eligible for harmonisation.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	Amcor Rorschach obtained OHSAS 18001 certificate which is current to the Entity's certification scope under ASI and is therefore eligible for harmonisation.
11.2 OH&S Management System	Conformance	Amcor Rorschach obtained OHSAS 18001 certificate which is current to the Entity's certification scope under ASI and is therefore eligible for harmonisation.
11.3 Employee engagement on health and safety	Conformance	Amcor Rorschach obtained OHSAS 18001 certificate which is current to the Entity's certification scope under ASI and is therefore eligible for harmonisation.
11.4 OH&S performance	Conformance	Amcor Rorschach obtained OHSAS 18001 certificate which is current to the Entity's certification scope under ASI and is therefore eligible for harmonisation.