

ASI CERTIFICATION CHAIN OF CUSTODY STANDARD



PRESENTED TO

AMCOR FLEXIBLES

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, appearing to be 'J. H.', written over a dark grey 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 sites Rorschach (Switzerland), Singen and Teningen (Germany), Froges and Sarrebourg (France) and, related corporate management activities at Amcor Flexibles Head Office (Switzerland).

SUMMARY AUDIT REPORT

CHAIN OF CUSTODY

STANDARD

OVERVIEW

MEMBER NAME	Amcor
ENTITY NAME	Amcor Flexibles
CERTIFICATION SCOPE	Amcor Flexibles sites Rorschach (Switzerland), Singen and Teningen (Germany), Froges and Sarrebourg (France) and, related corporate management activities at Amcor Flexibles Head Office (Switzerland).
SUPPLY CHAIN ACTIVITIES	Post-Casthouse
ASI STANDARD	Chain of Custody Standard V1
AUDIT TYPE	<ul style="list-style-type: none">• Certification Audit (28 September 2019, 29 October 2018, 2 April 2019)• Scope Change Audit (11 – 27 June 2019)• Surveillance Audit (8 – 9 December 2020)
AUDIT FIRM	DNV GL
AUDIT DATE	<ul style="list-style-type: none">• 28 September 2018, 29 October 2018, 2 April 2019 (Certification Audit and follow-up desktop audit)• 11 – 27 June 2019 (Scope Change Audit)• 8 – 9 December 2020 (Surveillance Audit)
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none">• 18 December 2018 (Initial Certification Audit Report), re-submitted 13 May 2019 (follow-up desktop audit)• 11 November 2019 (Scope Change Audit Report)• 24 April 2021 (Surveillance Audit)
AUDIT SCOPE	<p><u>Initial Certification Audit:</u></p> <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">• Post-Casthouse <p>Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.</p> <p><u>Scope Change Audit (11 – 27 June 2019):</u></p>

The audit scope covered:

- Amcor Flexibles Sarrebourg SAS
- Amcor Flexible Packaging France SAS, site de Froges
- Amcor Flexibles Teningen Tscheulin-Rothal GmbH
- Amcor Flexibles Rorschach AG
- Amcor Flexibles Singen GmbH

Supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

Surveillance Audit (8 – 9 December 2020):

The audit scope included the Amcor Flexibles Singen site in Germany and the related corporate activities at Amcor Flexibles Head Office in Zurich, Switzerland.

The supply chain activities included in the audit scope:

- Post-Casthouse

Relevant criteria from the ASI Chain of Custody Standard were included in the audit scope.

At the time of the Audit (December 2020), access to the site was not possible, due to COVID-19 related travel restrictions. The Audit has been undertaken as a 'desktop' exercise, in accordance with ASI Interim Policy regarding Audits, Audit-Related Travel and Coronavirus (v4), and included a remote review of relevant documentation.

AUDIT
OUTCOME

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

Re-Certification Audit

NEXT AUDIT
DUE DATE

21 May 2022

CERTIFICATION
NUMBER

15

SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
1 MANAGEMENT SYSTEM AND RESPONSIBILITIES		
1.1 ASI membership	Conformance	Amcor Limited (parent company of the 5 Amcor Entities included in the certification scope) is an active ASI member: https://aluminium-stewardship.org/about-asi/asi-members/amcor/
1.2 Management system	Conformance	Amcor established policies, systems, procedures and processes that comply with the ASI Chain of Custody Standard criteria regarding management systems. The management system 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 sites in-scope of this certification have integrated management systems underpinned by ISO 9001. The sites' ISO 9001 certificate are valid for the certification period.
1.3 Management system reviews	Conformance	The Entity has established mechanisms for the periodic review of the Management System, in line with sites' ISO 9001 certification. Amcor Flexibles Singen has established mechanisms for the periodic review of the Management System, in line with their ISO 9001 certification which is regularly audited in accordance with the ISO standards. For potential areas of non-compliance, Amcor Flexibles Singen will use the procedure for customer complaints management which sets out roles and responsibilities for managing customer complaints about CoC certificates.
1.4 Management representative	Conformance	Each Amcor site in-scope has nominated a management representative to have overall responsibility of the implementation of ASI CoC and authority for the site's conformance with all applicable requirements of the ASI Chain of Custody Standard. This was confirmed during the surveillance audit at Amcor Flexibles Singen and management representative changes were verified.
1.5 Training	Conformance	Amcor sites have communicated and delivered training to relevant personnel to raise awareness of ASI CoC requirements. This criterion was further reviewed at the surveillance audit, training records

CRITERION	RATING	COMMENT
		and training materials were inspected at Amcor Flexibles Singen. Amcor sites are progressively expanding the training to more personnel, beyond the supply chain department, to make them aware of and competent in their responsibilities under the ASI CoC Standard as CoC material is coming in.
1.6 Record keeping	Conformance	Amcor sites maintain up to date records covering all applicable requirements of the ASI Chain of Custody Standard and retains them for a minimum of five years.
1.7a Reporting to ASI (Inputs and Outputs)	Conformance	The Entity submits its annual report to ASI in conformance with the following ASI requirement: a. Input and Output Quantities of CoC Material/s over the calendar year. At the time of the surveillance audit, only Amcor Flexibles Singen had Output Quantities of CoC Materials to report over the calendar year. The Mass Balance system was reviewed during the audit.
1.7b Reporting to ASI (Input Percentage)	Conformance	The Entity submits its annual report to ASI in conformance with the following ASI requirement: b. Input Percentage/s calculated for the calendar year.
1.7c Reporting to ASI (Positive Balance)	Conformance	The Entity submits its annual report to ASI in conformance with the following ASI requirement: c. Maximum Positive Balance in the calendar year carried over to the subsequent Material Accounting Period, if any.
1.7d Reporting to ASI (Internal Overdraw)	Conformance	The Entity submits its annual report to ASI in conformance with the following ASI requirement: d. Maximum Internal Overdraw within the calendar year, if any, and the percentage of Input Quantity of CoC Material this represents.
1.7e Reporting to ASI (Eligible Scrap)	Not Applicable	The Entity is not engaged in Aluminium Re-melting/Refining.
1.7f Reporting to ASI (ASI Credits from Casthouses)	Not Applicable	The Entity is not engaged in producing Casthouse Products.
1.7g Reporting to ASI (ASI Credits purchased)	Not Applicable	The Entity is not engaged in the use of ASI Credits and after internal alignment and discussion with customers it was confirmed there was no plan at Amcor overall to use the ASI Market Credits System.

CRITERION	RATING	COMMENT
2.1 Outsourcing Contractors in CoC Certification Scope	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC criteria and definitions.
2.2a Control of CoC Material	Not Applicable	Amcor sites will not use any outsourcing contractor.
2.2b No further outsourcing	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC Standard criteria and definitions.
2.2c Risk assessment	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC Standards criteria and definitions.
2.3 Output Quantity	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC Standards criteria and definitions.
2.4 Verification and record-keeping	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC Standards criteria and definitions.
2.5 Error management	Not Applicable	Amcor sites will not use any outsourcing contractor as per ASI CoC Standards criteria and definitions.

3 PRIMARY ALUMINIUM: CRITERIA FOR ASI BAUXITE, ASI ALUMINA AND ASI LIQUID METAL

3.1a CoC Certification Scope – Bauxite Mining	Not Applicable	This Criterion is not applicable to the Entity's certification scope.
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.

4 RECYCLED ALUMINIUM: CRITERIA FOR ELIGIBLE SCRAP AND ASI LIQUID METAL

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.

CRITERION	RATING	COMMENT
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.
5 CASTHOUSES: CRITERIA FOR ASI ALUMINIUM		
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.
6 POST-CASTHOUSE: CRITERIA FOR ASI ALUMINIUM		
6.1a CoC Certification Scope – Post-Casthouse	Conformance	Amcor controls all in-scope sites for this CoC certification. The sites' operating procedures and strategic plans with current and future ASI certified suppliers work to secure the supply and production of ASI CoC Materials. In addition, through its responsible sourcing strategy Amcor encourages more suppliers to provide ASI certified material. Amcor also drives capacity-building efforts in key supply chains and has helped a number of Value Chain Partners from bauxite mine to semi-fabrication to get ready for the ASI Standards.
6.1b ASI Performance Standard – Post-Casthouse	Conformance	Amcor sites in-scope have achieved certification to the ASI Performance Standard.
6.1c Sourcing ASI Aluminium	Conformance	Amcor's operating procedures and Material Accounting System ensures that the Entity only sources CoC materials from another CoC certified entity via traceable CoC documents.
7 DUE DILIGENCE FOR NON-COC INPUTS AND RECYCLABLE SCRAP MATERIAL		
7.1a Responsible sourcing policy (anti-corruption)	Conformance	Amcor developed a Supplier 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: https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf

CRITERION	RATING	COMMENT
7.1b Responsible sourcing policy (responsible sourcing)	Conformance	Amcor's Supplier Code of Conduct includes the ASI CoC criteria of responsible sourcing policy and has initiatives in place to ensure the policy is implemented, including undertaking EcoVadis risk assessments of key strategic suppliers, engaging through a Responsible Sourcing Commitment form and conducting second party audits covering sustainability indicators.
7.1c Responsible sourcing policy (human rights due diligence)	Conformance	<p>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. The Supplier Code of Conduct is available at:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</p> <p>The Code of Conduct is based on OECD guidelines, the Universal Declaration of Human Rights, and EcoVadis, which is itself on the conventions of the International Labour Organisation (ILO).</p>
7.1d Responsible sourcing policy (conflict affected and high risk areas)	Conformance	<p>Amcor undertakes EcoVadis supplier risk assessments, which consider the inherent risk profiles of countries based on risk criteria, including health, social, corruption, human rights and environment indicators. The EcoVadis assessment takes into account conflict affected and high-risk areas. Amcor implements mitigation measures adequate to the risk ratings.</p> <p>All suppliers are also required to sign the Code of Conduct which is based on OECD guidelines, the Universal Declaration of Human Rights, and EcoVadis, which is itself on the conventions of the International Labour Organisation (ILO):</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</p>
7.2 Risk assessment	Conformance	Amcor Flexibles Head Office is responsible for running the supplier risk assessment programme. EcoVadis assessment is required from 100% of critical, strategic and core suppliers. EcoVadis assessment reports for strategic aluminium suppliers were reviewed during the audit. Relevant procurement managers are trained on how to use the EcoVadis assessment in their purchasing decisions and managing supplier relationships. Where risks are identified by the EcoVadis assessment, a follow up meeting with suppliers is

CRITERION	RATING	COMMENT
		<p>organised by Category Managers and key sustainability personnel to identify gaps in performance and create an action plan to resolve these.</p> <p>Amcor also conducts second party audits of suppliers and this is tracked through the Supplier Relationship Management Database.</p>
7.3 Complaints mechanism	Conformance	<p>Amcor's Whistleblower Policy and independent Whistleblower Service enable 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. Access to Amcor's Whistleblower Policy is available:</p> <p>https://assets.ctfassets.net/f7tuyt85vtoa/A7acCXyI3Qyg8eY4gaS6Q/7785b3379dbc17d9d6d1ce36e4406363/Whistleblower_Policy_and_Charter_-_April_2018_-_English.pdf</p>
8 MASS BALANCE SYSTEM: COC MATERIAL AND ASI ALUMINIUM		
8.1 Material Accounting System	Conformance	<p>Each in-scope Amcor entity operates its own Material Accounting System that records input quantity and output quantity of CoC Material and Non-CoC Material, by mass. The Material Accounting Systems are based on mass balance at each in-scope Amcor Entity.</p> <p>Amcor Flexibles Singen operates its own Material Accounting System that records input quantity and output quantity of CoC Material, by mass. The mass balance system was reviewed during the surveillance audit which included spot checks and re-performance of the CoC and Non-CoC Material volume data. Original source evidence was reviewed to substantiate the reported figures on SAP.</p>
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	Amcor sites' Material Accounting Systems specify a material accounting period, which is aligned to Amcor's financial year 1 st July - 30 th June.
8.4 Input Percentage	Conformance	In-scope entities calculate and record the Input Percentage for a given material accounting period

CRITERION	RATING	COMMENT
		<p>using the required formula, as per ASI guidelines. Further site-level implementation was reviewed during the surveillance audit at Amcor Flexibles Singen. Input across all foil stock is tracked regularly. Input percentage is calculated on a monthly basis and controlled to match the forecasted outputs of ASI Materials. The supply chain and customer services team, as well as material planning have regular monthly governance meetings to ensure the output do not proportionally exceed the inputs.</p>
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	<p>The Entity has processes in place to ensure that the output quantities of ASI Material do not proportionally exceed the input quantities of ASI Material.</p> <p>During the surveillance audit at Amcor Flexibles Singen it was noted that over the material accounting period in 2020 to date, the output quantities of ASI CoC Materials were lower than the input quantities. Spot checks were carried out on invoices sent to customers, accompanying CoC Documents and order forecasts to ensure the reported figures are accurate and robust.</p>
8.7 Output Quantity designation	Conformance	In-scope entities have demonstrated that the output quantity of CoC Material, which may be a subset of total production, will be designated as 100% CoC Material. Mass of total shipment and mass of total ASI CoC Material (by type) in shipment is defined on the CoC Documents issued to customers.
8.8 Output Quantity – Pre-Consumer Scrap	Not Applicable	At present, Amcor sites do not intend to determine waste material as ASI pre-consumer scrap.
8.9 Outputs not exceed inputs	Conformance	<p>In-scope entities' Material Accounting Systems ensure that the total output of CoC Material and/or Eligible Scrap does not proportionally exceed the input percentage as applied to total input of CoC Material and/or Eligible Scrap over the material accounting period.</p> <p>The effectiveness of these measures were further reviewed during the surveillance audit at Amcor Flexibles Singen. Amcor Flexibles Singen has set up internal governance procedures to ensure the forecasted outputs are met by the inputs ordered from ASI CoC certified suppliers. The review of the mass balance system shows that Amcor Flexibles</p>

CRITERION	RATING	COMMENT
		Singen effectively implemented these checks and balances.
8.10a Internal Overdraws (not exceed 20%)	Conformance	<p>Where CoC Material is under contract for delivery to an entity within a given material accounting period, but is subject to a force majeure situation, Amcor sites' Material Accounting System may carry over an Internal Overdraw to the subsequent material accounting period. The Internal Overdraw shall not exceed 20% of total Input Quantity of CoC Material for the Material Accounting Period, Amcor sites have demonstrated awareness of this rule.</p> <p>Amcor Flexibles Singen integrated the internal overdraw rules as per ASI CoC criteria in their management system manual and internal process. To date, the ASI CoC outputs did not exceed the ASI CoC input quantities.</p>
8.10b Internal Overdraws (not exceed affected amount)	Conformance	<p>Where CoC Material is under contract for delivery to an entity within a given material accounting period, but is subject to a force majeure situation, Amcor sites' Material Accounting Systems may carry over an Internal Overdraw to the subsequent material accounting period. The Internal Overdraw shall not exceed the amount of CoC Material affected by the force majeure situation. Amcor sites have demonstrated awareness of this rule.</p> <p>Amcor Flexibles Singen integrated the internal overdraw rules as per ASI CoC criteria in their management system manual and internal process. To date, the ASI CoC outputs did not exceed the ASI CoC input quantities.</p>
8.10c Internal Overdraws (period to make up)	Conformance	<p>Where CoC Material is under contract for delivery to an Entity within a given material accounting period, but is subject to a force majeure situation, Amcor sites' Material Accounting Systems may carry over an Internal Overdraw to the subsequent material accounting period. The Internal Overdraw shall be made up within the subsequent material accounting period. Amcor sites have demonstrated awareness of this rule.</p> <p>Amcor Flexibles Singen integrated the internal overdraw rules as per ASI CoC criteria in their management system manual and internal process. To date, the ASI CoC outputs did not exceed the ASI CoC input quantities.</p>
8.11a Positive Balance (carry over)	Conformance	Each in-scope Amcor entity operates its own Material Accounting System. Where an Amcor entity has a Positive Balance of output CoC Material at the

CRITERION	RATING	COMMENT
		<p>end of a material accounting period, there are plans in place to carry this over to the subsequent material accounting period. The Entity's Material Accounting System must clearly identify any carry over of a Positive Balance. Amcor sites have demonstrated awareness of this rule.</p> <p>The Entity did not carry over any Positive Balance from the previous accounting period. Amcor Flexibles Singen is aware of the ASI criteria related to Positive Balance, which is documented in its internal instructions and part of training provided to employees.</p>
8.11b Positive Balance (expiry)	Conformance	<p>Where an Amcor site has a Positive Balance of output CoC Material at the end of a material accounting period, there are plans in place to carry this over to the subsequent material accounting period, and for the positive balance to expire at the end of that Period if not drawn down.</p> <p>The Entity did not carry over any Positive Balance from the previous Accounting Period. Amcor Flexibles Singen is aware of the ASI criteria related to Positive Balance, which is documented in its internal instructions and is part of the training provided to employees.</p>
9 ISSUING COC DOCUMENTS		
9.1 Shipments and transfers	Conformance	Amcor sites have systems enabling shipment and transfer of CoC documents, ensuring that these are controlled, issued and stored as per ASI Chain of Custody Standard requirements.
9.2a Date of issue	Conformance	Amcor issues the following information on invoice documents as required by ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2b Reference number	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2c Issuing Entity	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee,

CRITERION	RATING	COMMENT
		conformance statement, type and mass of CoC material and mass of total material.
9.2d Receiving customer	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2e Responsible employee	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2f Conformance statement	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2g Type of CoC Material	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2h Mass of CoC Material	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.2i Mass of total material	Conformance	Amcor issues the following information on invoice documents as required by the ASI Chain of Custody Standard: date of issue, reference number, issuing entity, receiving customer, responsible employee, conformance statement, type and mass of CoC material and mass of total material.
9.3a Sustainability Data (optional)	Not Applicable	In-scope entities are not planning on filling out the sustainability data about CoC Material on the CoC documents.

CRITERION	RATING	COMMENT
9.3b Sustainability Data (passing on)	Not Applicable	In-scope entities are not planning on filling out the sustainability data about CoC Material on the CoC documents.
9.3c Post-Casthouse ASI Certification status	Conformance	ASI Performance Standard certification statuses are indicated on the CoC documents issued by Amcor Flexibles Singen.
9.4 Supplementary Information (optional)	Not Applicable	Amcor sites do not intend to include supplementary information on the CoC documents.
9.5 Response to verification requests	Conformance	Customer service teams are responsible for handling the CoC requests from customers at all individual Amcor sites in-scope. Customer service team members have received training on their duties. Furthermore, Amcor has integrated error management within its current processes under ISO 9001.
9.6 Error management	Conformance	Amcor's Knowledge Management System, KMS, handles errors related to ASI CoC Materials. Amcor has implemented processes to inform different stakeholders, such as clients or suppliers, on the non-conformity or error and agree on necessary corrective actions.
10 RECEIVING COC DOCUMENTS		
10.1 Verify required information included	Conformance	The in-scope entities' capacity at the site which enables them to meet CoC criteria has been observed. The SAP system is used to handle incoming materials, and training has been given to relevant personnel on how to verify received CoC documents. Amcor Flexibles Singen has demonstrated how they meet the criteria on received CoC documents. The SAP system is used for handling incoming materials, and training has been given to relevant personnel on how to verify CoC documentation.
10.2 Verify consistency with shipments	Conformance	The in-scope entities established processes to ensure that CoC documents are controlled, issued and stored as per ASI CoC requirements. Amcor Flexibles Singen has demonstrated how they meet the criteria on received CoC documents and the traceability on existing transfers and shipments was observed. The SAP system is used for handling incoming materials, and training has been given to relevant personnel on how to verify CoC documentation.

CRITERION	RATING	COMMENT
10.3 Verify supplier CoC Certification status	Conformance	The in-scope entities established robust processes to ensure suppliers have a valid ASI certificate and trigger adequate processes if any changes occur to their status. The process is managed by Amcor's central procurement function. Amcor Flexibles Singen has demonstrated how they meet the criteria on received CoC documents and the traceability on existing transfers and shipments was observed. The SAP system is used for handling incoming materials, and training has been given to relevant personnel on how to verify CoC documentation.
10.4 Error management	Conformance	Amcor integrated error management with its current processes under ISO 9001. The operation of its Knowledge Management System was observed, which was robust to document errors, corrective actions and any potential preventive measures to meet ASI Chain of Custody Standard criteria.

11 MARKET CREDITS SYSTEM: ASI CREDITS

11.1a Material Accounting System – allocation	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.1b Link to Casthouse Products	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.1c No double counting	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.1d No Positive Balance for ASI Credits	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2a Date of issue	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2b Reference number	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2c Issuing Entity	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2d Receiving Entity	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2e Conformance statement	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.2f ASI Credits statement	Not Applicable	Amcor does not intend to utilise the ASI market credits system.

CRITERION	RATING	COMMENT
11.2g Quantity	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3a CoC Certification Scope – purchasing ASI Credits	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3b Material Accounting System – purchasing	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3c Expiry	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3d No re-trading	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3e No allocation to physical products	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3f Verify supplier CoC Certification status	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
11.3g Five years maximum for ASI Credits purchasing	Not Applicable	Amcor does not intend to utilise the ASI market credits system.
12 CLAIMS AND COMMUNICATIONS		
12.1a ASI Claims Guide	Conformance	Amcor has appointed a representative and defined 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 claim has been made yet.
12.1b Verifiable evidence	Conformance	Amcor has appointed a representative and defined 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 claim has been made yet.
12.1c Employee training	Conformance	The Entity has defined guidelines for communicating public claims and representations outside of CoC documents (such as website, social media, press releases, investor relations, and other publications) and all communications must be approved by senior management prior to publication. It has also communicated these guidelines to appropriate personnel.

Document Control and Version History

Revision	Date	Notes
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0	23 May 2019	Issued.
1	11 December 2019	Updated to reflect Certification Scope change with addition of Amcor Flexibles Sarrebourg SAS, Amcor Flexible Packaging France SAS, site de Froges, Amcor Flexibles Teningen Tscheulin-Rothal GmbH and Amcor Flexibles Rorschach AG.
2	20 May 2021	Surveillance audit. Update of Certification Scope for readability and inclusion of activities at Head Office.