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# ASI CERTIFICATION PERFORMANCE STANDARD

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PRESENTED TO

# AMCOR FLEXIBLES RORSCHACH

CERTIFICATE  
NUMBER

11

ASI  
STANDARD

PERFORMANCE  
STANDARD  
(V2 2017)

CERTIFICATION  
LEVEL

FULL  
CERTIFICATION

ASI ACCREDITED  
AUDITOR

DNV BUSINESS  
ASSURANCE  
SERVICES UK  
LTD.

DATE OF ISSUE

16 SEPTEMBER 2022

DATE OF EXPIRY

15 SEPTEMBER 2025

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  
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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](http://www.aluminium-stewardship.org)**

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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"><li>Material Conversion (Production and Transformation)</li></ul>
ASI STANDARD	<ul style="list-style-type: none"><li>Performance Standard V2</li></ul>
AUDIT TYPE	<ul style="list-style-type: none"><li>Initial Certification Audit (13 – 14 September 2018 and 3 June 2019)</li><li>Re-Certification Audit (12 – 14 July 2022)</li><li>Surveillance Audit (26 September 2023)</li></ul>
AUDIT FIRM	DNV Business Assurance Services UK Ltd.
AUDIT DATE	<ul style="list-style-type: none"><li>13 – 14 September 2018 and 3 June 2019 (Initial Certification Audit)</li><li>12 – 14 July 2022 (Re-Certification Audit)</li><li>26 September 2023 (Surveillance Audit)</li></ul>
AUDIT REPORT SUBMISSION	<ul style="list-style-type: none"><li>16 November 2018 (Initial Certification Audit)</li><li>20 July 2019 (Re-submitted following Desktop Audit)</li><li>16 August 2022 (Re-Certification Audit)</li><li>13 October 2023 (Surveillance Audit)</li></ul>
AUDIT SCOPE	<p><u>Initial Certification Audit (13 – 14 September 2018 and 3 June 2019)</u></p> <p>The Audit Scope covers Amcor Flexibles including the AF Rorschach site (Switzerland).</p> <p>Supply chain activities included in the Audit Scope:</p> <ul style="list-style-type: none"><li>Material Conversion (Production and Transformation)</li></ul> <p>All relevant Criteria from the ASI Performance Standard were included in the Audit Scope.</p>

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Re-Certification Audit (12 – 14 July 2022)

The Audit Scope covers Amcor Flexibles including the AF Rorschach site (Switzerland).

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant Criteria from the ASI Performance Standard were included in the Audit Scope.

Surveillance Audit (26 September 2023)

The Audit Scope covers Amcor Flexibles including the AF Rorschach site (Switzerland).

Supply chain activities included in the Audit Scope:

- Material Conversion (Production and Transformation)

All relevant Criteria from the ASI Performance Standard were included in the Audit Scope.

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AUDIT  
OUTCOME

- Certification

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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.

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CERTIFICATION  
PERIOD

16 September 2022 – 15 September 2025

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NEXT AUDIT  
TYPE

Surveillance Audit

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NEXT AUDIT  
DUE DATE

15 September 2024

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CERTIFICATE  
NUMBER

11

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## SUMMARY OF FINDINGS

CRITERION	RATING	COMMENT
PRINCIPLE 1 BUSINESS INTEGRITY		
1.1 Legal Compliance	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to the ASI Performance Standard's legal compliance requirements. The Entity has implemented systems to maintain awareness of and to ensure compliance with Applicable Law. Amcor Flexibles Headquarters (referred to as Amcor Flexibles HQ) supports the Entity with legal counsel.
1.2 Anti-Corruption	Conformance	The Entity works against Corruption in all its forms, including Extortion and Bribery, consistent with Applicable Law and prevailing international standards. Among the Ant-Corruption instruments implemented are Policies, training, guidelines, and Risk Assessments. More information is available in the 2021 Sustainability Report: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a>
1.3 Code of Conduct	Conformance	The Entity has implemented a Code of Conduct including principles relevant to environmental, social and governance performance. Amcor's Code of Conduct is available at: <a href="https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf">https://assets.ctfassets.net/f7tuyt85vtoa/6vKfxsmeRisoQumUWIsEQw/09eac164d42103e24abb101c431c9037/Amcor-Supplier-Code-of-Conduct.pdf</a>
PRINCIPLE 2 POLICY & MANAGEMENT		
2.1a Environmental, Social, and Governance Policy (implement and maintain)	Conformance	The Entity's Management Systems are ISO 14001 certified. The Entity has implemented and maintained policies consistent with the environmental, social and governance practices included in the ASI Performance Standard. More information is available in the 2021 Sustainability Report: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a>
2.1b Environmental, Social, and Governance Policy (senior management)	Conformance	The Entity has senior management endorsement and support through the provision of resources and regularly reviews Environmental and Health and Safety Management Systems. The Entity holds valid ISO 14001 and ISO 50001 certificates.
2.1c Environmental, Social, and Governance Policy (communication)	Conformance	The Entity has communicated its Policies internally and externally as appropriate (e.g., company website, intranet). Their Code of Conduct is actively

CRITERION	RATING	COMMENT
		communicated to their business partners, especially suppliers.
2.2 Leadership	Conformance	The Entity has a nominated person at the Senior Management level who has overall responsibility and authority for ensuring conformance with the ASI Performance Standard and to ensure sufficient resources to support the implementation.
2.3a Environmental and Social Management Systems (environmental)	Conformance	The Entity has documented and implemented an accredited Environmental Management System according to ISO 14001:2015.
2.3b Environmental and Social Management Systems (social)	Conformance	The Entity has documented and implemented an accredited Health and Safety (H&S) Management System according to ISO 45001 and a verified Social Management System (achieving SEDEX, SMETA and EcoVadis Rating requirements).
2.4 Responsible Sourcing	Conformance	Amcor Flexibles' Middle East and Africa (EMEA) Procurement organisation manage the Entity's responsible sourcing activities. The Entity undertakes supplier risk assessment via EcoVadis according to the Code of Conduct 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	The Entity adheres to the capital expenditure and investments Due Diligence and impacts assessment processes established by Amcor Flexibles HQ. This includes the estimation of environmental, social, governance and other aspects, for instance, energy efficiency gains, health and safety considerations and impacts on labour rights.
2.6 Emergency Response Plan	Conformance	The Entity has implemented a site-specific Emergency Response Plan developed in collaboration with relevant Stakeholders such as the community, Workers and their representatives, and relevant authorities. The Entity holds valid ISO 14001 and ISO 45001 certificates.
2.7 Mergers and Acquisitions	Conformance	The Entity has developed and implemented procedures to manage Mergers and Acquisitions including stage reviews for evaluation, preliminary assessment, and on-site assessment.

CRITERION	RATING	COMMENT
2.8 Closure, Decommissioning and Divestment	Conformance	The Entity has established Closure and Decommissioning Guidelines and has implemented Environmental Impact Assessment and mitigation measures, including social planning for the Closure, Decommissioning and Divestment.
PRINCIPLE 3 TRANSPARENCY		
3.1 Sustainability Reporting	Conformance	Amcor Flexibles EMEA is responsible for Sustainability Reporting and has publicly disclosed its governance approach and its Material environmental, social, and economic impacts. The 2022 Amcor Sustainability Report is available at: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a>
3.2 Non-compliance and liabilities	Minor Non-Conformance	The Entity provides information on non-compliances and liabilities in the Amcor 2022 Sustainability Report, pages 33 and 38: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a> Amcor reports environmental non-compliances on page 33 however it does not indicate which sites but the total number of violations. There is no information on the corrective action taken by the Entity regarding the non-compliance associated with the release of contaminants into Lake Constance in December 2020 and January 2021. Implementation of measures required by authorities is still under progress in 2023.
3.3a Payments to governments (legal and contractual)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes that conform to Anti-Corruption requirements related to payments to governments and the facilitation of payments.
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	The Entity has recently reviewed its internal grievance mechanism and assigned roles and responsibilities to manage any Stakeholder complaints. Internal announcements about the changes to the procedure are planned and integrated into communication channels (e.g., a welcome visitor video). The Entity has an established Whistleblower Service which is open to external Stakeholders to report any issues, concerns, or requests for information. <a href="https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html">https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html</a> The Entity holds a valid ISO 14001 certification.

CRITERION	RATING	COMMENT
PRINCIPLE 4 MATERIAL STEWARDSHIP		
4.1a Environmental Life Cycle Assessment (life cycle impacts)	Conformance	The Entity has evaluated the life cycle impacts of its major product lines. More information is available at: <a href="https://www.amcor.com/media/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game">https://www.amcor.com/media/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game</a>
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 is available upon request.
4.1c Environmental Life Cycle Assessment (public communication)	Conformance	The Entity's LCA information and the underlying assumptions used are available at: <a href="https://www.amcor.com/media/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game">https://www.amcor.com/media/news/b/amcor-flexibles-life-cycle-assessment-tool-at-the-top-of-the-game</a>
4.2 Product design	Conformance	Amcor Flexibles HQ has developed a procedure documenting how sustainability and environmental life cycle performance and objectives are incorporated into the design and development process of products or components containing Aluminium. The Entity has implemented this procedure on site, further information on the Entity's product design approach is available at: <a href="https://www.amcor.com/sustainability">https://www.amcor.com/sustainability</a>
4.3a Aluminium Process Scrap (targets)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes to minimise the generation of Aluminium Process Scrap within its operations. The Entity has an objective to recycle 100% of its Aluminium Process Scrap.
4.3b Aluminium Process Scrap (alloy separation)	Conformance	The Entity has implemented an Aluminium Process Scrap (alloy separation) strategy and process.
4.4a Collection and recycling of products at end-of-life (strategy)	Conformance	Amcor Flexibles HQ announced a commitment in January 2018 to develop all packaging to be recyclable or reusable by 2025. Amcor worked with the Ellen MacArthur Foundation to develop baseline definitions for its targets and measurement system against this pledge. The Entity has demonstrated several initiatives to assess Material flows and enhance the recyclability of its products, collaborating with multiple Stakeholders. Further information is available in the 2022 Sustainability Report: <a href="https://www.amcor.com/sustainability">https://www.amcor.com/sustainability</a>

CRITERION	RATING	COMMENT
4.4b Collection and recycling of products at end-of-life (engagement)	Conformance	The Entity has engaged with local, regional, national, and global Stakeholders to increase the collection and recycling of products containing Aluminium at end-of-life. It is working closely with several partners, such as the Ellen MacArthur Foundation (EMF), World Food Programme (WFP) and Ocean Conservancy, as well as other regional initiatives focused on implementing effective and efficient recycling, such as 'The Recycling Partnership', CEFLEX (A Circular Economy for Flexible), MRFF (Materials Recovery Facilities for the Future and REDCycle). Further information is available in the Amcor 2022 Sustainability Report: <a href="https://www.amcor.com/sustainability">https://www.amcor.com/sustainability</a>

#### PRINCIPLE 5 GREENHOUSE GAS EMISSIONS

5.1 Disclosure of GHG emissions and energy use	Conformance	The Entity through its parent company has disclosed the Greenhouse Gas (GHG) Emissions and energy use. Further information is available in the Amcor 2022 Sustainability Report: <a href="https://www.amcor.com/sustainability">https://www.amcor.com/sustainability</a>
5.2 GHG emissions reductions	Conformance	The Entity, through its parent company, has published its GHG Emissions reduction information (called EnviroAction). Further information is available in the Amcor 2022 Sustainability Report: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a>
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 annually reports its Air Emissions such as Carbon dioxide CO <sub>2</sub> and Volatile Organic Compounds (VOCs). Other gas emissions (CO and NOx) are reported yearly. The authorities take regenerative Thermal Oxidizer (RTO) Emission control measurements.
6.2 Discharges to Water	Conformance	The Entity has developed and implemented a water management plan and procedure to monitor the water quality that is discharged.



CRITERION	RATING	COMMENT
6.3a Assessment and Management of Spills and Leakage (assessment)	Conformance	The Entity has developed and implemented Policies, systems, procedures, and processes for handling Spills and Leakage including an assessment of potential events and what controls should be implemented.
6.3b Assessment and Management of Spills and Leakage (management)	Minor Non-Conformance	<p>The Entity has developed a process to manage Spills and Leakages that includes implementing corrective actions and has implemented a procedure to report environmental pollution or Spills. However, a release of contaminants from firefighting foam containing Perfluorooctanesulfonic acid (PFOS) into Lake Constance occurred in December 2020 and January 2021. The Entity was fined as an outcome of a court case in February 2022. No additional environmental conditions were imposed by the environmental authorities however preventive and corrective actions were implemented. An Eight Discipline Methodology (8D) investigation was undertaken, and a report was made available, which indicates that all measures including monitoring and implementation of technical solutions were established to prevent re-occurrence.</p> <p>This latest audit confirmed that some more measures are still required to be implemented by the local environment authority (Amt für Umwelt) in 2023. AF Rorschach must extend the fire water retention volume on-site to avoid re-occurrence.</p>
6.4a Reporting of Spills (immediate disclosure)	Minor Non-Conformance	The Entity has developed a process to manage Spills and Leakages, including documenting details of Spills and has implemented a procedure to report environmental pollution or Spills. Following a Spill of contaminants into Lake Constance in December 2020 and January 2021. The Entity immediately disclosed the Spill upon detection, however, did not disclose the incident to the correct authority (i.e., the Environment Ministry).
6.4b Reporting of Spills (regular reporting)	Minor Non-Conformance	The Entity has developed and implemented processes and procedures to report on Spills and the remediation actions taken. However, following a Spill of contaminants into Lake Constance in December 2020 and January 2021, public communication regarding the incident was not disclosed. The Entity has implemented corrective action, led by Amcor's Zurich Head Office Communication Team. Public information was provided in July 2022.

CRITERION	RATING	COMMENT
		In 2023, additional corrective actions are required to be implemented by the environmental authority (Amt für Umwelt). AF Rorschach must extend the fire water retention volume on-site to avoid reoccurrence.
6.5a Waste management and reporting (strategy)	Conformance	The Entity has implemented a Waste Management Strategy on-site as a part of the global waste management of Amcor Flexibles EMEA. Defined Waste management data are exchanged with Amcor Flexibles EMEA. Switzerland requires special waste to be registered on the Pollutant Release and Transfer Register (PRTR). The Entity, through its parent company, has published its Waste information as a part of Amcor's EnviroAction Program.
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 published its Waste information as part of the EnviroAction Program.
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 (state 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.

CRITERION	RATING	COMMENT
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	The Entity has implemented processes to conduct annual water assessments and analyses of water. Through its parent company, the Entity has published information related to water management as part of the EnviroAction Program.
7.1b Water assessment (risk assessment)	Conformance	The Entity has implemented a water risk assessment and a water risk plan. A contract for unlimited water extraction with the local water authority is in place. Temperature and water quality controls are implemented regularly.
7.2a Water management (management plans)	Conformance	The Entity has implemented a water management plan based on an improvement of the process to reduce water usage. The plan is revised every year, it is reviewed and monitored by Amcor Flexibles HQ.
7.2b Water management (monitoring)	Conformance	The Entity has implemented a water risk assessment and a water risk plan. Through its parent company, it has published information related to water management (EnviroAction). A contract for unlimited water extraction with the local water authority is in place. Temperature and water quality controls are undertaken regularly.
7.3 Disclosure of water usage and risks	Conformance	The Entity reports water usage data and water-related risks to the parent company, and Amcor discloses consolidated results in the Sustainability Report 2022, available at: <a href="https://www.amcor.com/sustainability-report">https://www.amcor.com/sustainability-report</a>

#### PRINCIPLE 8 BIODIVERSITY

8.1 Biodiversity assessment	Conformance	The Entity has conducted a biodiversity risk assessment based on an independent third-party
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CRITERION	RATING	COMMENT
		analysis taking its Area of Influence into consideration. It concluded low levels of risk to Biodiversity Values because of the site's activities. The Entity has integrated impacts on Biodiversity Values in its environmental aspect analysis and integrated monitoring plans into its Environmental Management System.
8.2a Biodiversity management (biodiversity action plans)	Not Applicable	This Criterion is not applicable as the Biodiversity risk assessment identified there are no Material Biodiversity impacts. However, the Entity has 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.
8.2b Biodiversity management (consultation and mitigation hierarchy)	Not Applicable	This Criterion is not applicable as the Biodiversity risk assessment identified there are no Material Biodiversity impacts. However, the Entity has consulted an independent expert when undertaking the Biodiversity risk assessment which takes into consideration the canton municipality's overall Biodiversity strategy.
8.2c Biodiversity management (reporting)	Not Applicable	This Criterion is not applicable as the Biodiversity risk assessment identified there are no Material Biodiversity impacts and therefore reporting on Biodiversity outcomes is not required.
8.3 Alien Species	Conformance	The Entity has implemented an integrated risk exposure for the introduction of invasive species in its environmental risk register. It has also taken measures to mitigate 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.

CRITERION	RATING	COMMENT
PRINCIPLE 9 HUMAN RIGHTS		
9.1a Human Rights Due Diligence (policy)	Conformance	<p>The Entity has implemented a Code of Conduct that incorporates a Policy-level commitment to respect Human Rights. It is communicated to internal and external Stakeholders.</p> <p><a href="https://www.amcor.com/investors/corporate-gov/policies-standards">https://www.amcor.com/investors/corporate-gov/policies-standards</a></p> <p>Amcor released a Modern Slavery Statement in 2017:</p> <p><a href="https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf">https://assets.ctfassets.net/f7tuyt85vtoa/IP5QWZToqW2sSeyQo4soO/01ea37aaaaa20ec654c65f5183e6103d/Modern-Slavery-Statement.pdf</a></p>
9.1b Human Rights Due Diligence (process)	Conformance	<p>The Entity has considered vulnerable groups (e.g., women, migrant Workers, apprentices etc.) and has implemented measures to mitigate these risks in its Human Resources Management System. The Supplier Code of Conduct requires suppliers to submit Due Diligence information via EcoVadis.</p>
9.1c Human Rights Due Diligence (remediation)	Conformance	<p>Amcor operates a Whistleblowing Service which is communicated to employees and external Stakeholders on-site in Rorschach. Locally, the Entity has established a grievance mechanism through which interested parties can report any issues or concerns. The process 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. More information is available at:</p> <p><a href="https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html">https://secure.ethicspoint.eu/domain/media/en/gui/104827/index.html</a></p>
9.2 Women's Rights	Conformance	<p>The Entity has developed and implemented Policies, systems, procedures, and processes regarding women's rights. The Entity has publicly reported on gender diversity indicators such as the number of female/male Workers and male/female senior managers. Through interviews, observations, and document review there was no indication of Discrimination against women.</p>
9.3 Indigenous Peoples	Not Applicable	<p>This Criterion is not applicable as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.</p>
9.4 Free, Prior, and Informed Consent (FPIC)	Not Applicable	<p>This Criterion is not applicable as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.</p>

CRITERION	RATING	COMMENT
9.5 Cultural and sacred heritage	Not Applicable	This Criterion is not applicable as Indigenous Peoples or their lands, territories and resources are not present in the Entity's Area of Influence.
9.6a Resettlements (avoid or minimise)	Not Applicable	This Criterion is not applicable as no Resettlements are being considered or taking place or are expected to occur during the Certification Period.
9.6b Resettlements (where unavoidable)	Not Applicable	This Criterion is not applicable as no Resettlements are being considered or taking place or are 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. This is verified through evidence of engagement with Local Communities could be verified (e.g., Environmental authority, labour authorities, and nature protection communities).
9.7b Local Communities (impacts)	Conformance	The Entity takes appropriate steps to prevent and address any adverse impacts on Local Community livelihoods resulting from its activities and identifies risks by conducting Impact Assessments.
9.7c Local Communities (livelihoods)	Conformance	The Entity has developed a community engagement plan and explores with the Local Community to identify opportunities to respect and support their livelihoods.
9.8 Conflict-Affected and High-Risk Areas	Conformance	The Entity has undertaken an EcoVadis supply chain risk assessment which identifies high-risk suppliers from a Human Rights perspective and has implemented adequate mitigation measures. Conflict-Affected and High-Risk Areas (CAHRAs) are included as screening criteria in the risk assessment. The Entity has established a conflict mineral Due Diligence process that considers CAHRAs.
9.9 Security practice	Conformance	The Entity is not involved with public and private security providers, respect for Human Rights and good practices of security services are required, if contracted.
PRINCIPLE 10 LABOUR RIGHTS		
10.1a Freedom of Association and Right to Collective Bargaining (freedom of association)	Conformance	The Entity respects the rights of Workers to unite freely in the unions, seek representation and join the works council without interference.

CRITERION	RATING	COMMENT
10.1b Freedom of Association and Right to Collective Bargaining (collective bargaining)	Conformance	The Entity respects the rights of Workers to bargain collectively. However, there is no collective agreement in place regarding wages as it is not a legal requirement in Switzerland. The Entity has set up a system to determine the wages of Workers depending on job grade, individual performance, and budget increases.
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 a country (Switzerland) where Applicable Law restricts the right to Freedom of Association and Collective Bargaining.
10.2a Child Labour (minimum age)	Conformance	The Entity does neither use nor support the use of Child Labour. The minimum working age of 15 years is respected. The youngest worker (an apprentice) is 16 years old.
10.2b Child Labour (hazardous)	Conformance	The Entity does neither use nor support the use of Child Labour and does not engage in or support Hazardous Child Labour. Young Workers are employed for educational purposes only. Work with hazardous substances happens only under the supervision and as part of vocational education.
10.2c Child Labour (worst forms)	Conformance	The Entity does neither use nor support the use of child labour and does not engage in or support the Worst Forms of Child Labour.
10.3a Forced Labour (human trafficking)	Conformance	The Entity does not engage in nor support the use of Forced Labour or support Human Trafficking directly or through any employment or recruitment agencies. Further information is available in Amcor's Modern Slavery Statement: <a href="https://www.amcor.com/investors/corporate-gov/policies-standards">https://www.amcor.com/investors/corporate-gov/policies-standards</a>
10.3b Forced Labour (deposits, fees, advances)	Conformance	The Entity does not demand any form of deposit, recruitment fee or equipment advance from Workers.
10.3c Forced Labour (migrant workers)	Conformance	The Entity does not require Migrant Workers to lodge deposits or security payments at any time, this was verified through interviews and document review.
10.3d Forced Labour (debt bondage)	Conformance	The Entity does not hold Workers in Debt Bondage or force them to work to pay off a debt, this was verified through on-site observation, interviews, and document review.



CRITERION	RATING	COMMENT
10.3e Forced Labour (freedom of movement)	Conformance	The Entity does not unreasonably restrict the freedom of movement of Workers in the workplace or on-site housing. This was verified through on-site observation, interviews, and document review.
10.3f Forced Labour (retention of identity papers, permits, certificates)	Conformance	The Entity does not retain original copies of Workers' identity papers, work permits, travel documents or training certificates. This was verified through interviews and document review.
10.3g Forced Labour (freedom to terminate employment)	Conformance	The Entity does not deny Workers the freedom to terminate their employment at any time without penalty, given notice of reasonable length, this was verified through interviews and document review.
10.4 Non-Discrimination	Conformance	The Entity ensures equal opportunities for Workers and does not engage in or support Discrimination in hiring, salary, promotion, training, advancement opportunities or termination of any Worker based on 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	The Entity ensures open communication and direct engagement with Workers and their representatives regarding working conditions and resolution of workplace and compensation issues, without the threat of reprisal, intimidation, or harassment (e.g., team briefings, information board, meetings with worker representation).
10.6 Disciplinary practices	Conformance	The Entity has implemented a Corporate Policy Ethic Code of Conduct and does engage in nor tolerate verbal or physical violence, gender-based violence or other harsh treatment of Workers. This is addressed within Swiss regulations on disciplinary practices (e.g., written warnings).
10.7a Remuneration (living wage)	Conformance	The Entity respects the rights of Workers to earn a living wage and ensures that wages paid for a normal working week meet the industry standard. Wages are compared to existing statistics to ensure a decent income.
10.7b Remuneration (method of payment)	Conformance	The Entity makes wage payments in a timely manner and in accordance with legal requirements. Workers are provided with pay slips.



CRITERION	RATING	COMMENT
10.8 Working Time	Conformance	The Entity has established and implemented a Working Time Policy which is included in employment contracts. A clocking-in system, time records and time bank account are in place.
PRINCIPLE 11 OCCUPATIONAL HEALTH AND SAFETY		
11.1a Occupational Health and Safety (OH&S) Policy (policy)	Conformance	The Entity has implemented an H&S Management System and is certified according to ISO 45001:2018 by accredited certification body SQS. An Environment, Health and Safety (EHS) Policy is implemented and communicated to all employees and interested parties. The EHS policy is displayed at the site/shopfloor and is valid for everyone. The content of the Policy is communicated to contractors. Contractors must sign a safety contract.
11.1b Occupational Health and Safety (OH&S) Policy (workers and visitors)	Conformance	The Entity holds a valid ISO 45001:2018 certification. The Entity's Occupational Health and Safety (OH&S) Policy is applied to Workers and Visitors present in any area and activities under its control. It is communicated internally and externally, and training is periodically conducted. Compliance with Applicable Law is periodically checked. Management regularly reviews the Policy and procedures.
11.1c Occupational Health and Safety (OH&S) Policy (applicable law and standards)	Conformance	An EHS policy is displayed across the Entity, including the 'shop floor' and is valid for everyone. The EHS Policy includes all relevant requirements based on Applicable Law for Workers Health and Safety, international standards and ILO Conventions.
11.1d Occupational Health and Safety (OH&S) Policy (right to stop unsafe work)	Conformance	The Entity holds a valid ISO 45001:2018 certification and has implemented an OH&S Management System. As part of the Management System, an EHS policy has been established and includes that Workers have the right to understand the hazards and safe practices for their work and that they have the right to refuse or stop unsafe work.
11.2 OH&S Management System	Conformance	The Entity holds a valid ISO 45001 certification for its OH&S Management System. The OH&S Management System is implemented with a high level of performance. Additionally, a risk management system is in place for assessing all risks of all work areas on site. Risk reduction measures are ongoing. Occupational Health, Safety

CRITERION	RATING	COMMENT
		and Environment (OHSE) training held and recorded.
11.3 Employee engagement on health and safety	Conformance	The Entity holds a valid ISO 45001 certification for its OH&S Management System. A health and safety committee has been implemented and meets every month. The outcomes of the committee meetings are communicated to all Workers and actions are reported and documented. Accidents and near misses are recorded and analysed. Toolbox talks as behaviour audits are planned throughout the year and a safety captain concept is driven by the Workers.
11.4 OH&S performance	Conformance	The Entity holds a valid ISO 45001 certification for its OH&S Management System. The Health and Safety activities are managed by KPI targets and regular evaluation. OH&S objectives are defined and KPIs are monitored periodically.

#### **Document Control and Version History**

Revision	Date	Notes
0	16 September 2019	Initial Certification Audit - Full Certification
1	2 June 2021	Non-Audit Revision - update 'next audit type' and 'date' to replace Surveillance Audit (consistent with ASI Assurance Manual V1 for High Overall Maturity Rating, Table 1, page 14)
2	16 September 2022	Re-Certification Audit and correction to the Supply Chain Activities and Audit Scope for the Initial Certification Audit.
3	31 October 2023	Surveillance Audit