

## FRAUD PREVENTION POLICY

### 1. Purpose

- 1.1. This policy sets out the general principles and minimum requirements for managing fraud risks across the Amcor Group and all its member and affiliated companies (collectively referred to herein as “the Company”).
- 1.2. It is the policy of the Company that all co-workers are committed to the highest standards of integrity through honest and ethical behaviour and refrain from engaging in fraud.

### 2. Applicability and Scope

- 2.1 This policy applies to all co-workers, officers and directors of the Company.
- 2.2 Furthermore Amcor expects any person involved in the Company’s business to act with integrity and to share its attitude to fraud.

### 3. Definitions

- 3.1 The term “fraud”, as used in this policy, refers generally to any “intentional act committed to secure an unfair or unlawful gain” including, but not limited to, asset misappropriation and fraudulent statements.
- 3.2 These can be further categorised as;

Fraud Classification System		
Source: Association of Certified Fraud Examiners (ACFE)		
Asset Misappropriation	Fraudulent Statements	Corruption★
<b>Cash</b> <ul style="list-style-type: none"><li>• Theft of cash</li><li>• False payment requests</li><li>• Cheque fraud</li><li>• Billing schemes</li><li>• Misuse of accounts</li></ul> <b>Non-cash</b> <ul style="list-style-type: none"><li>• Theft of inventory/ fixed assets</li><li>• Theft of information or IP</li><li>• False invoicing</li><li>• Payroll fraud</li><li>• Accounts receivable fraud</li></ul>	<b>Financial</b> <ul style="list-style-type: none"><li>• Intentional improper revenue recognition</li><li>• Intentional misstatement of assets, liabilities and/ or expenses</li><li>• Other intentional accounting misstatements (e.g. capitalization of expenses, concealment of losses)</li></ul> <b>Non-financial</b> <ul style="list-style-type: none"><li>• Falsified employment credentials</li></ul>	Addressed by the Company Anti-Bribery & Corruption Policy
Addressed by this Policy		

★ Due to the global nature of Amcor's operations; Amcor has a separate policy for Bribery & Corruption to meet the requirements of increased regulations, specifically, the US Foreign Corrupt Practices Act and UK Bribery Act.

## 4. Policy Objectives

4.1 This policy seeks to minimise the financial, operational and reputational damage that can be caused to the Company through fraud.

## 5. Policy Statement

5.1 The overarching principles that this policy sets out are;

1. Fraud of any kind will not be tolerated
2. Amcor will maintain an effective and continuously improving fraud prevention program
3. Amcor expects suppliers and customers to act with integrity and to share its attitude to fraud
4. A system of internal financial controls to minimize the potential for fraud to go undetected

5.2. Minimum requirements

### Principle 1: Fraud of any kind will not be tolerated

- Fraud of any kind will not be tolerated.
- All co-workers have a responsibility to be alert to the signs of fraud, and to report suspected fraud without delay.
- Through their behaviour and leadership, executives and managers will promote a culture of openness, honesty and integrity.

### Minimum requirement

- As a minimum, leadership teams must communicate the Company position on fraud at least annually to co-workers. This communication must reinforce the principles set out in this policy and should ensure that co-workers are aware of their responsibilities and the support available to them. This can be accomplished in a number of ways i.e. ASX declaration, email, eLearning, conferences etc.

### Principle 2: Amcor will maintain an effective and continuously improving fraud prevention program

- Amcor is committed to the prevention, detection and investigation of fraud, with an overriding aim to prevent the occurrence of fraud in the first instance.
- Amcor will respond to all incidents, seeking to recover losses, taking action against those who perpetrate fraud and will report incidents to the authorities as appropriate.
- All businesses within the Company will implement a fraud risk management framework that is appropriate for the size, nature and complexity of the fraud risks

they face.

## Minimum requirement

The leadership team for each Business Group must ensure that:

- An appropriately experienced individual is given responsibility for coordinating, implementing and maintaining the fraud risk management process;
- A periodic fraud risk assessment is conducted. Any risks identified are investigated and followed up with controls tailored to manage the risks;
- A fraud awareness program exists;
- Proactive data analysis tools are available to monitor high risk transactions; and
- The Company fraud response and investigation procedure is adhered to.

Upon notification of fraud, managers must decide on the appropriate course of action and record this in line with the reporting requirements set out below;

- Frauds involving senior management, or which may exceed US\$100k, must be reported immediately to the Chief Executive Officer, copying the Group General Counsel, Group CFO and VP Group Internal Audit. "Senior management" is defined as the direct reports to a member of Business Group Executive Team and/or member of Group Executive Team; and
- All other suspected or proven frauds will be reported to the VP Group Internal Audit, who will advise Group Chief Financial Officer and the Audit & Compliance Committee. If this is not possible, they should report their findings or suspicions to an independent Senior Manager or through Amcor's Whistleblower Service (where permitted).

Principle 3: Amcor expects suppliers and customers to act with integrity and to share its attitude to fraud

- The Company expects our business partners to uphold similar principles for fraud prevention and to share the Company's attitude to fraud.

## Minimum requirement

- All agents, joint venture partners and other business partners should be made aware of the Company's standards of behavior and attitude to fraud.
- All businesses should adopt local policies to ensure that its agents, joint venture partners and other business partners are the subject of appropriate due diligence checks (which may include background/ reference checks) and review to ensure that the Company principles and standards of behavior relating to fraud are maintained (refer to the Company Supplier Handbook and qualification process).

Principle 4: A system of internal financial controls to minimize the potential for fraud to go undetected

- All businesses within the Company must keep books, records and accounts, which, in reasonable detail, accurately and fairly reflect the transactions and dispositions

of company assets.

- Co-workers and Amcor representatives must exercise caution regarding the giving or receiving of business related gifts and hospitality.

## Minimum requirement

- Each business must have in place rigorous internal procedures that control and segregate the process of approving and paying expenses and other payments. Such processes must be audited periodically (by both management and internal audit).
- There are certain types of gifts that should never be accepted by a co-worker or Amcor representative regardless of value. These are: money, drugs or other controlled substances, discounts for product or services that are not available to other co-workers, personal use of accommodation or transportation, and payments or loans to be used to purchase personal property.
- A gift and hospitality register must be maintained and accurate records kept of all transactions relating to the offering or acceptance of gifts (refer to the ABC Policy for more information).

## 6. Responsibility and Accountability

This section summarises the key responsibilities for the delivery of an effective fraud prevention program.

### 6.1 All co-workers

All co-workers are required to act in accordance with this policy and related policies including the Corporate Code of Conduct & Ethics Policy, Anti-Bribery & Corruption Policy, Share Trading Policy, Whistleblower Policy and Competition Protocols. This Policy places responsibility for the prevention, detection and reporting of fraud with all co-workers.

### 6.2 Audit & Compliance Committee

The Audit & Compliance Committee of the Board of Directors has a responsibility to oversee management activities in managing the risk of fraud, and to ensure that management properly address the risk of fraud through the implementation of an effective fraud prevention program that will identify, prevent, detect and respond to fraud throughout the Company.

### 6.3 Fraud Risk Champions (typically the BG CFO)

Fraud Risk Champions are responsible for;

- Establishing and maintaining an effective internal control framework for fraud within the business for which they are accountable. This includes controls concerning the prevention, detection and investigation of fraud and ensuring that co-workers are aware of their responsibilities in this regard.

- Promoting fraud awareness amongst co-workers.
- Ensuring the effectiveness of the fraud prevention program in the business for which they are responsible.

#### 6.4. **Risk Management & Compliance Coordination**

The individual(s) nominated as having responsibility for the coordination and development of fraud risk management practices within a specific business, is responsible for:

- Familiarising themselves with this document and training materials
- Coordinating fraud risk assessments.
- Developing and implementing appropriate measures to prevent, detect and investigate fraud.
- Preparing fraud reports, and
- Maintaining their skills and knowledge in this area, as well as sharing knowledge with other co-workers.

#### 6.5. **Managing Director & Chief Executive Officer, Executive Officers and Business Group Presidents**

As well as their fiduciary duties, the MD & CEO, Executive Officers and Business Group Presidents are responsible for setting the standards of integrity, ethical behaviour and the cultural philosophy of the organisation that in turn influences the actions of its people ('the tone from the top') in accord with Amcor's Values.

#### 6.6. **Group Company Secretariat/ General Counsel and Business Group legal Counsel**

Group Legal is responsible for maintaining and managing the Whistleblower service, Bribery & Corruption training and for providing advice in relation to undertaking legal proceedings both criminal and civil, including the processes to be followed for the recovery of losses.

#### 6.7. **Group Chief Financial Officer**

The Group Chief Financial Officer is responsible for maintaining a sound system of internal control as it relates to internal financial control.

#### 6.8. **Director Group Risk & Compliance**

The Director Group Risk & Compliance is responsible for creating and maintaining the overall fraud risk management program through which fraud risks will be managed.

#### 6.9. **Human Resources**

Human Resource functions are responsible for ensuring that (where permitted) adequate procedures are in place for pre-employment checks, communication of and training on ethical values and fraud and business ethics policies to employees and maintaining disciplinary policies that are consistent with the Group's requirements, subject to these being in accordance with relevant local laws and regulations.

## 6.10. **Group Internal Audit**

Under the leadership and direction of the VP Group Internal Audit, Group Internal Audit will:

- Provide assurance services to management and the Audit & Compliance Committee in terms of reviewing the adequacy and effectiveness of the systems of internal control as they relate to fraud prevention, detection and investigation;
- Respond to management's requests for investigations into matters of fraud, probity and compliance and/ or maintain a relationship with a global forensics partner who can provide those services as needed; and
- Provide support to fraud risk assessment and awareness activities.

## 7. **When and how to raise a concern**

The prevention, detection and reporting of fraud is the responsibility of all co-workers. Be vigilant to fraud and report all suspected instances of fraud immediately to your manager. If you suspect your manager may be involved, contact the Group Internal Audit (GIA) team or if you wish to remain anonymous, contact the Amcor Whistleblower Service (where local laws permit). Amcor does not penalize co-workers for fulfilling their obligation to ensure that Amcor's conduct meets its policies on compliance and ethics.

May 2015