

Introduction

Amar strives to conduct business in a manner that aligns with internationally recognized human rights and respects the dignity of all people, both within our own operations and through our supply base. This approach is informed by the UN Guiding Principles on Business and Human Rights and by landmark documents such as the United Nations Declaration of Human Rights (UDHR) and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

Amar operates in accordance with the national laws of each country where we conduct business, while also adhering to internationally recognized practices and procedures. These core principles, which the Board and senior management of Amar are committed to upholding, are enshrined in Amar's values and encapsulated in Amar's Code of Conduct.

Scope

This policy applies to all Amar locations and team members and is supported by additional Amar policies, including the Amar Code of Conduct. We expect our suppliers and business partners to operate with similar regard for ethics and human rights, in alignment with Amar's Supplier Code of Conduct. Both of these documents can be found in the [Corporate Governance Policies and Standards section](#) of Amar's website.

Our commitment

Amar commits to ethical business practices that respect human rights and we require our suppliers and business partners to do the same.

We communicate our expectations for our own workforce and operations through the Amar Code of Conduct, which all employees are required to review and comply with. We cascade our expectations to suppliers and business partners through our Supplier Code of Conduct, which all suppliers are also expected to sign and comply with.

Specifically, Amar operates with consideration and respect for the following priorities, and requires our suppliers and business partners to do the same within their own operations:

Workplace health and safety

Amar's top priority is operating our businesses in a manner that protects the health and safety of our team members, contractors, visitors and community, while maintaining full compliance with applicable laws, regulations and voluntary obligations. We aim to create a workplace that is healthy, safe, secure and incident-, illness-, and injury-free.

Amar seeks to continuously improve safe and responsible behavior among all co-workers through a global environment, health and safety management system built on standards, mandatory training, regular audits and self-assessments at every site.

Freedom from discrimination and harassment

Amar is committed to a respectful, safe workplace where everyone feels welcome and each co-worker is protected from unlawful discrimination, harassment, abuse, intimidation and violence.

All recruitment and employment decisions are made solely on talent and contributions to the success of the business. We prohibit discrimination based on national, ethnic or social origin, marital status, health status, disability, sexual orientation, age, gender, gender identity, political opinion, religion or belief, or other status protected by applicable law.

Professional conduct is mandatory in every workplace interaction, and we strictly prohibit any behavior that could cause another individual to feel uncomfortable, intimidated, threatened or unsafe.

Freedom from child labor

Amcor prohibits the use of child labor. We recognize the rights of every child to be protected from economic exploitation and respect the laws of each country in which we operate regarding the minimum hiring age for co-workers.

Typically, Amcor does not hire anyone under the age of 18. The employment of young workers below the age of 18 shall only occur through apprenticeships or internships permitted by law, or in non-hazardous work when young workers are above a country's legal age for employment.

Freedom from forced labor

Amcor prohibits the use of coerced, bonded, indentured or involuntary prison labor. All employees shall be free to leave or terminate their employment in accordance with local and national laws without fear of physical, psychological, sexual or verbal abuse or any form of retaliation. We strictly prohibit any form of physical punishment or abuse of workers and will not utilize mental or physical disciplinary practices. We prohibit delayed or withheld wages and the withholding of identity documents.

Freedom of association and collective bargaining

Amcor respects the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. We believe that open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

Compensation

Amcor is committed to providing adequate and competitive pay based on market data and industry benchmarks. We comply with wage, overtime and benefit practices as required by any applicable laws, regulations and binding collective agreements. All compensation decisions follow robust internal processes that are agnostic to gender, ethnicity or any other individual characteristics.

Working hours

Amcor is committed to ensuring our employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.

Environment and sustainability

Through Amcor's sustainability strategy, we prioritize actions that reduce the environmental and human rights impacts of our products, operations and value chain, which may disproportionately impact vulnerable communities around the world.

This strategy includes actions to mitigate our contribution to climate change by reducing our carbon footprint; to support a circular economy for packaging by developing recyclable and reusable packaging, using circular materials and investing in recycling technologies and infrastructure; and to engage in responsible sourcing activities to reduce our contribution to deforestation and biodiversity loss. We continue exploring additional ways to reduce Amcor's impacts.

Amcor plc

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Risk management

As with all other business risks, Amcor incorporates human rights-related risks into our principles of effective risk management as set out in the COSO (Committee of Sponsoring Organizations) Enterprise Risk Management Framework. This approach is detailed in [Amcor's Risk Management Framework Summary](#).

Grievance mechanisms

Amcor is committed to the highest standards of ethical practices and honest relationships and to the protection of individuals who report, in good faith, known or suspected violations. We do not tolerate retaliation in any form against an individual who in good faith reports known or suspected wrongdoing, or assists in an investigation, even if the report is mistaken.

Amcor's Whistleblower Service enables co-workers and third parties, such as suppliers, consumers, contractors, and customers, to report potential misconduct within the organization. It is available online and through a dedicated, multilingual hotline at <http://www.amcor.com/whistleblower>, that operates 24 hours a day via an independent third-party service provider. Complaints may be submitted anonymously where permitted by law. Additionally, co-workers can report any potential incidents of misconduct directly to their supervisor or any member of management, the Group Internal Audit, Human Resources, Legal or Health and Safety representative for their Business Group.

All complaints received are referred to Amcor's Whistleblower Committee for investigation in collaboration with the relevant business group or internal audit function. Outcomes from each investigation are reported to the board of directors but are not disclosed externally due to confidentiality protections.

Remediation

If child labor is found at an Amcor workplace, Amcor would develop a corrective action and remediation plan, which should include immediate protection of any children and young workers as follows:

- Amcor would ensure that children stop work immediately, are provided a clear explanation of immediate next steps and are supported through the process by an appropriate member of Amcor's human resources team.
- Amcor would undertake a full review of the site's personnel records and create a list of all potential child laborers and young workers, ensure that all children identified have access to safe and adequate housing and meals, and are adequately protected from harm until they can be reunited with their family.

Amcor expects its suppliers to undertake credible due diligence and monitor their operations to ensure that their sites and supply chains are free from child labor and young people employed in hazardous work. If child labor is found at a site supplying products to Amcor, the supplier must notify Amcor. Amcor would engage with the supplier or site and any appropriately qualified organization to develop a solution that prevents further harm and supports the long-term interests of the children.

Suppliers must not (i) remove, dismiss or conceal any of the suspected or confirmed child labors and/or young workers without prior notification to Amcor, (ii) threaten the children or their families, or interfere with any part of the assessment or remediation; or (iii) conceal or falsify any documentation. Such actions will be considered by Amcor as evidence that the supplier and site are not committed to effective child labor remediation and are in breach of Amcor's policies and procedures.

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