



# CODE OF CONDUCT

DECEMBER 2024





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# AMCOR'S VALUES







Amcor\* recognizes the importance of honesty, integrity and fairness in conducting its business and is committed to increasing shareholder value while fulfilling its responsibilities as a good corporate citizen.

The Company believes that it is not only required to abide by the national laws in each country in which it operates, but that it must also conduct its business in accordance with internationally accepted practices and procedures.

These core principles, which the Board and senior management are committed to upholding, are enshrined in **Amcor's Values** and encapsulated in this Code of Conduct (the "Code").

Definitions:

- \* "Amcor" and the "Company" means Amcor plc and its subsidiaries.
- \* "Board" means the Board of Directors of Amcor plc.
- \* "Co-worker" and "you" means directors, officers, employees, agents, contractors, volunteers, interns, secondees, agency workers and any other parties who are employed or engaged to act as representatives of Amcor





# ETHICS & INTEGRITY







**The Code sets out the standards and behaviors expected from all of us, serving as a guide for ethical decision-making and professional conduct across all aspects of our business. Everyone at Amcor, regardless of their position, has a duty to act with honesty and integrity, observing the highest ethical standards of business conduct at all times.**

Each co-worker is expected to familiarize themselves with the Code and to comply with it as well as with all applicable laws, rules and regulations.

Co-workers with leadership or managerial responsibilities are subject to additional obligations and must lead by example. This means ensuring that all their actions align with the Company's core values, clearly communicating the principles of the Code to their teams, creating an environment where their team feels safe and comfortable asking questions or reporting wrongdoing and supporting Amcor's compliance training program.

As a condition to employment, the Company reserves the right to ask each co-worker to confirm that they understand and agree to follow the Code when they start employment and as often as the Company may deem necessary after that.

Any waiver of the Code for directors or executive officers may only be made by the Board or its designated committee and must be disclosed to the extent required by law or regulation.

Violations of the Code or **Company policies** may result in serious consequences for both the Company and the individuals involved. For these reasons, failure to comply with the Code may lead to disciplinary action, including termination in accordance with applicable local laws.

As part of Amcor's commitment to ethical and legal conduct, co-workers are expected to promptly report any known or suspected wrongdoing to the Company, following the process outlined in the **Whistleblower policy**.

Retaliation in any form against those who report wrongdoing in good faith, or assist in an investigation, even if the report is mistaken, is a serious violation of this Code and will not be tolerated. Acts of retaliation should be reported immediately and will be dealt with appropriately.

If you have questions about any aspects of the Code, you should seek help or advice from your supervisor, any member of the management team, your HR representative or your General Counsel.







# DOING THE RIGHT THING



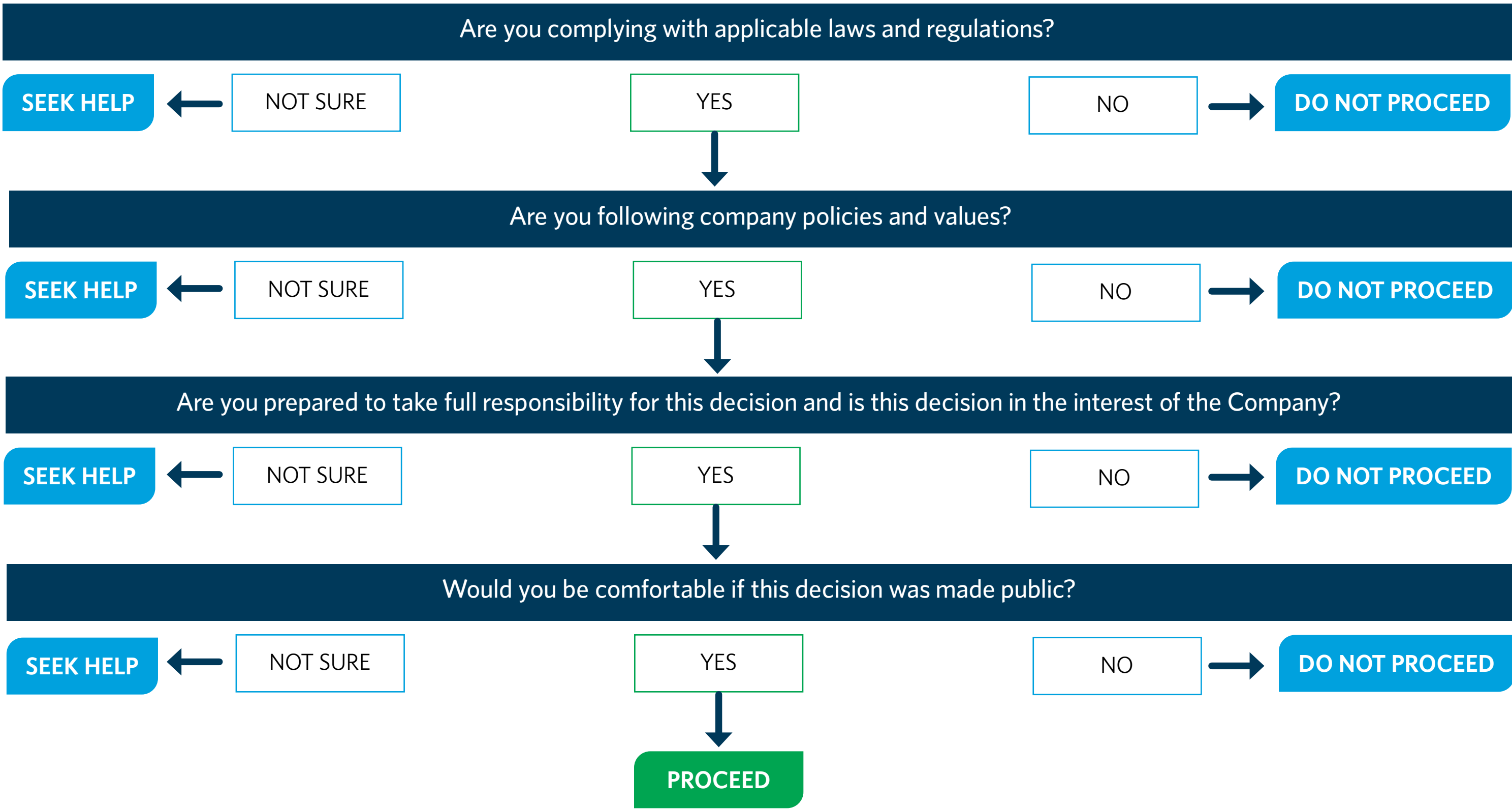




To help guide co-workers in making responsible and ethical choices, follow the ethical decision-making chart below. This tool offers a clear and structured process to evaluate potential actions and ensure alignment with the Company’s values and the Code.

If you are still unsure or have any questions, discuss any potential concerns with your supervisor, your HR representative or your General Counsel (or another individual specifically designated by them to act in such capacity on their behalf (an “Authorized Delegate”)). See [Seeking Guidance](#).

Making ethical decisions







# CORE PRINCIPLES







# WORK ENVIRONMENT

Safety is a core value at Amcor and people are at the center of everything we do. We are committed to providing a safe and healthy workplace for our co-workers and visitors and are dedicated to fostering a professional and supportive workplace environment that promotes diversity, equity and inclusion. We believe that all workers should be treated with dignity and respect and should not be subject to discriminatory employment practices.

## Workplace Health and Safety

We aspire to create a safe, healthy and compliant workplace free from undesired incidents, illnesses and injuries, respecting the health and safety of our people, partners and the communities in which we operate.

Everyone plays a role in assuring safety and health for themselves and others. This involves management commitment to providing a workplace conducive to this objective and engagement from every co-worker in adhering to safe and compliant workplace practices Company-wide.

Workplace injuries result in unnecessary hardship to individuals and their families, so it is crucial to promptly report unsafe or hazardous conditions, accidents, injuries and any other health and safety concerns. If you are asked to perform a task you believe is unsafe or poses a risk to your safety and health or the safety and health of others, you must immediately stop the task and report the situation to your supervisor or a member of management, the responsible facility manager or the health and safety representative.

If you have any questions about Health and Safety, contact your supervisor or your local Health and Safety representative.

## Fair Recruitment and Employment Practices

Amcor is dedicated to ensuring that all recruitment and employment decisions are made fairly, objectively and without bias. Any hiring, compensation, promotion and training decisions are based on qualifications, experience, performance and business needs.

The Company provides wages and benefits that comply with applicable laws, mandatory industry standards and binding collective agreements, including those pertaining to the number of hours and days worked.

Discrimination based on race, color, creed, national origin, disability, gender identity or expression, marital status, age or sexual orientation, religious or political beliefs, or other status protected by applicable law is prohibited.

If you have any questions about discrimination, contact your local HR representative.

## Freedom of Association and Collective Bargaining

The Company believes that open communication and direct engagement between workers and management are the most effective way to resolve workplace and compensation issues. The Company 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.

Workers can communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.







## Inclusion and Belonging

Amcor is dedicated to creating an environment where our co-workers feel valued and heard. We are committed to fostering a workplace that encourages diverse perspectives and ensures equitable opportunities for all co-workers.

We dedicate ourselves to identifying and removing barriers and to ensuring that advancement opportunities occur in an equitable way. We continue to consciously evolve our behaviors and actions to create a more inclusive work environment that fosters open communication, trust and belonging ([Inclusion and Belonging](#)).

## Respect in the Workplace

Amcor recognizes the dignity of each co-worker and upholds the right to a workplace free from harassment, abuse, intimidation and violence. We expect all workplace relationships to be professional and respectful and are committed to maintaining this culture within the Company.

Any behavior that could cause another individual to feel uncomfortable, intimidated, threatened or unsafe is strictly prohibited. Some examples of prohibited behavior include:

- Propositions, demands or advances of a sexual nature,
- Unwelcome physical contact,
- Inappropriate remarks about someone's body or appearance,
- Humiliation, aggression or abuse,
- Vulgar, obscene or sexual gestures, language or comments,
- Slurs, disparaging remarks, insults, epithets and teasing,

- Harassment based on race, color, creed, national origin, disability, gender identity or expression, marital status, age or sexual orientation, religious or political beliefs, or
- Displaying offensive posters, symbols, cartoons, drawings or computer images.

Please refer to your local anti-harassment policy for additional information and, if you have any questions, contact your local HR representative.

Any behavior that undermines a safe and respectful workplace will not be tolerated and should be reported to your supervisor, HR representative or through the Amcor Whistleblower service. [The Whistleblower Policy](#) provides additional information and, if necessary, seek guidance from your General Counsel (or an Authorized Delegate).

## Substance Abuse

Safety in the workplace extends to maintaining a drug and alcohol-free environment. Impairment from illegal substances, prescription medication or over-the-counter drugs that could negatively impact job performance creates an unacceptable risk for both the individual and others.

Co-workers are prohibited from using, possessing, distributing, selling or being under the influence of alcohol or illegal drugs. Misusing over-the-counter or prescription medications, exceeding prescribed amounts or improperly using any inhalant or perception-altering substance while on Company premises or performing work is strictly forbidden.

Please refer to the [Drug and Alcohol Policy](#) for additional information and, if necessary, seek guidance from your supervisor or HR Representative.





# HONEST AND ETHICAL CONDUCT

Each co-worker must act with integrity and observe the highest ethical standards of business conduct when performing their duties. Co-workers should never use their position at Amcor for personal gain.

## Personal Accountability - Doing the Right Thing

### Conflicts of Interest

We all have a duty to act in the best interests of Amcor. It is your responsibility to avoid any situation where your personal, social, financial or political interests (or of those close to you such as family, members of your household, close friends or romantic partners) conflict, or appear to conflict, with your responsibilities to the Company or could negatively impact Amcor’s business relationships or reputation.

Any situation that creates, or appears to create, a conflict of interest must promptly be disclosed in accordance with your local or BG policy or, if none exists, to your General Counsel. If unsure, always disclose.

Each situation is unique but usually if appropriate safeguards are put in place, a potential conflict may be eliminated. Failure to disclose a conflict is a breach of the Code. Examples of some conflicts which must be disclosed include:

### Personal relationships within Amcor

Conflicts of interest can arise when a co-worker has a close personal relationship with another co-worker and they are in a direct or indirect reporting or supervisory relationship. Such relationships can lead to perceived or actual biases, favoritism or unfair treatment and must therefore be disclosed. Similarly, when a co-worker has decision-making authority over hiring a person close to them.

### Personal relationships outside Amcor

Co-workers with a close personal relationship with an individual associated with a current or potential Amcor vendor, customer or competitor may have a conflict of interest. Therefore, co-workers who are related by blood or marriage to, or have a close personal relationship with, someone who is employed by, or owns (anything more than a few publicly traded shares), an Amcor vendor, customer or competitor, must disclose such relationship when:

- (i) the Amcor co-worker or the associated individual is in any way involved in, could benefit from or be perceived to benefit from, the business dealings between Amcor and the vendor or customer or the employment with the competitor; or
- (ii) the Amcor co-worker or the associated individual is an executive or higher (meaning, holds the position of plant manager, vice president, owner or similar).

### Financial interests and related party transactions

If a director or executive officer of the Company, a nominee for election as a director or officer of the Company or an immediate family member of theirs is considering investing in a credit source, supplier, customer or competitor of Amcor (anything more than a few publicly traded shares), great care must be taken to ensure that these investments do not compromise their responsibilities with the Company. The Audit Committee of the Board must approve in advance any such investment to ensure decisions are made in the Company’s best interests.

Please refer to the **Delegated Authority Policy** and to the **Related Party Transactions Policy** which should be read in conjunction with the **Code of Ethics for Senior Financial Employees** for additional information.

### Outside employment or activities

Engaging in outside employment or activities that could affect your performance, limit your ability to devote appropriate time and attention to the Company or conflict with your duties and obligations to the Company, is not permitted. This includes, but is not limited to, work or activities that could negatively affect the reputation of the Company, create legal risk to the Company, compete with the Company or imply sponsorship or support by the Company.

If you wish to serve on the board of directors to an outside business on your own time, you must receive prior approval in writing from your General Counsel (or an Authorized Delegate). If the circumstances of the outside business change substantially, you must seek re-approval. Direct reports to the CEO are subject to the Corporate Governance Guidelines regarding board of director appointments to outside companies and require prior approval from the Board of the Company.

Subject to the above restrictions, you do not require prior approval if you wish, on your own time, to serve as a director or officer to a family business that has no relationship to the company, unless that entity takes public policy or economic positions adverse to Amcor’s interest.

### Political and charitable activities

As a company, we remain independent of any political parties. However, you are encouraged to engage in political and charitable activities in your personal time, provided that these activities do not interfere with work responsibilities and do not reflect negatively on Amcor.





You do not require prior approval if you wish, on your own time, to serve as a director or officer to a charity or in an advisory council or committee that has no relationship to the company, unless that entity takes public policy or economic positions adverse to Amcor's interest or your participation will interfere with your duties and obligations to the Company.

When participating in these activities, you must make it clear that it is not as a representative of Amcor.

Unless explicitly approved by the Company, you may not conduct political or charitable activities on work premises or use company time, resources or your position to advance personal political or charitable interests.

### How to disclose a conflict of interest

With the exception of external board appointments for the CEO's direct reports which must be disclosed in accordance with section 4 (Outside employment or activities) above, once a co-worker identifies a situation that gives rise, or appears to give rise, to a conflict of interest they must promptly report it to their General Counsel (or an Authorized Delegate).

If a conflict of interest, or apparent conflict of interest, has previously been disclosed and circumstances have changed, a new disclosure must be promptly initiated.

If you are in any doubt as to whether a conflict of interest exists, discuss the situation with your General Counsel (or an Authorized Delegate).

### Securities Laws and Insider Trading

While working at Amcor, you may become aware of non-public information (or information not commonly known in the market) about Amcor or another company, which if it were to become public

would affect a reasonable person's decision to buy, sell or hold stock or other securities in that company. Such information could include financial data, plans for acquisitions, material contracts, significant innovations, or the hiring, firing or resignation of a member of the Board or an officer of that company. Such information is known as "material non-public information" and any individual in the Company who has such information is an insider.

It is strictly prohibited under Company policy and illegal for an insider to use, or share, material non-public information for personal gain or to disclose it to any non-authorized third-party. It is also illegal and against Company policy for an insider to trade stocks or other securities, or tip others to do so, based on such information.

The trading of stock by directors, officers and other co-workers of the Company is subject to applicable securities laws and the Company's **Insider Trading Policies**. If necessary, consult with the Corporate General Counsel (or an Authorized Delegate) if you have any questions.

### Business Integrity – Honest and Fair dealings

You should conduct Company business with honesty and integrity at all times and in such a manner that Amcor's reputation will not be questioned if the details of these dealings should become public. Amcor upholds a strict zero-tolerance policy towards bribery, corruption and any conduct that limits or restricts fair competition or violates trade sanctions. Breaching these laws can have serious consequences for both Amcor and the individuals involved, including fines and imprisonment.

### Anti-Bribery and Corruption

Bribery involves the offering, promising, making, requesting or accepting of payments, or payments in kind (gifts, favors, hospitality etc.), to induce people to act illegally or dishonestly or to provide a benefit that is not legitimately due, corrupting the decision-making process. Corruption in

any form is strictly prohibited across all aspects of our business, in every country where we operate.

You should never offer, promise, give or accept anything of value given with the intention of influencing any act or decision, improperly obtaining new business, retaining existing business or securing an improper advantage.

Gifts, meals, refreshments, entertainment and other business courtesies of reasonable value are normal aspects of business. However, they must be consistent with usual industry practices, infrequent in nature and not lavish or extravagant. They may be acceptable so long as they are not intended to influence a specific business decision and do not violate any law or regulation or the policies of the recipient's organization. Please refer to your BG policy on gifts for additional guidance.

Co-workers have a responsibility to report any actual or attempted bribery, kickback or fraud to their General Counsel. Retaliation in any form against an individual who refuses to engage in bribery or reports in good faith a violation will not be tolerated.

For additional information, please refer to the **Anti-Bribery and Corruption Policy** which should be read in conjunction with any local or BG policy. If you have any questions, seek guidance from your supervisor or your General Counsel (or an Authorized Delegate).

### Fair Competition

Amcor supports the principles of free competition in the market in compliance with applicable competition laws.

Co-workers must never under any circumstances share or discuss commercially sensitive information with a competitor whether in an informal setting or at a trade association. Discussions or agreements with competitors on topics such as prices, pricing or business strategies, dividing or sharing markets, customers or territories, production volumes, bids or tenders, boycotting certain suppliers or customers, or any topic that could restrict competition are strictly prohibited.





When attending trade association events, never participate in or be involved in any way with discussions related to competition, customers, pricing, rebates, discounts or costs with competitors. Any such conversations must be terminated immediately, objections to such conversations voiced and you should remove yourself from the situation. Your General Counsel (or an Authorized Delegate) must be contacted and the incident reported promptly.

Any pricing information relating to competitors should be obtained in an ethical manner through public sources of information. The Company will not condone obtaining information concerning competitors through illegal means or other illicit or non-industry standard means, when the source could reasonably be questioned.

Amcor co-workers should ensure that they understand the **Competition Compliance policy** and act accordingly. Seek guidance, if necessary, from your General Counsel (or an Authorized Delegate).

### Compliance with Trade Restrictions

Amcor is committed to conducting its business in compliance with all applicable local and international trade requirements. Restrictions on the export or import of goods, technology and services to specific countries, individuals and entities must be strictly adhered to.

Please refer to the **Trade Compliance Policy** for additional information and seek guidance, if necessary, from your General Counsel (or an Authorized Delegate).

## PROTECTING AMCOR

### Proprietary and Other Confidential Information

You must at all times safeguard and protect the proprietary, confidential and trade secret information of the Company, including that of our business partners. Your use of such information is strictly limited to your work for the Company and the relevant project for which the information was disclosed to you. You should not discuss it with anyone (including internally) who is not authorized to access the information. Please refer to the **Intellectual Property Policy**.

The above obligations include material non-public information that has not been disclosed or made available to the public, such as financial data, plans for acquisitions, material contracts, significant innovations, or the hiring, firing or resignation of a member of the Board or an officer of that company. Please refer to the Securities Law and Insider Trading section of the Code.

Any proprietary or confidential information must be returned when requested or upon the termination of your employment and must be kept confidential even after leaving the Company.

Before entering into negotiations with a supplier, customer or other third party (or a party seeking to become one) a confidentiality agreement must be put in place, when necessary, before disclosing any confidential information.

### Property, Company Funds and Other Resources

When you are provided with Company-owned equipment, such as specialized tools or equipment, laptops or smartphones to perform your duties, you must use those resources responsibly and only for work-related purposes. Upon termination of employment, these must promptly be returned to the Company. Misuse or unauthorized use for personal gain, illegal activities or any activities that do not support the interests of Amcor are strictly prohibited.

Company property must be protected from unauthorized access, theft and vandalism.

Co-workers responsible for managing Company funds, such as petty cash or corporate credit cards, must use these resources strictly for approved business expenses and maintain accurate reports. Misappropriation or misuse of Company funds for personal gain is considered theft.

### Accurate and timely reporting

All reports made to regulatory authorities such as the Securities and Exchange Commission (or investors) must be full, fair, accurate, timely and understandable. No person may interfere with or seek to improperly influence, directly or indirectly, the accuracy, completeness or auditing of such records.

The Company's internal accounting controls are intended to safeguard the assets of the Company and to ensure the accuracy of its financial records. All records must properly, accurately and completely reflect all components of transactions in accordance with law and be promptly entered on our books.







## Data Privacy

Amcor is committed to protecting and respecting privacy rights. Personal data is any information that can be used to identify an individual, such as name, email address, contact information, IP address, date of birth or financial information.

The Company stores and processes the personal data of co-workers, customers, business partners, suppliers and other third parties in compliance with data protection and privacy laws of the countries in which it operates. Personal data cannot be transferred to another country without the appropriate measures being put in place.

The collection of personal data must be limited to what is needed and it can only be processed and used for legitimate business purposes. Only Amcor co-workers who have a need for the information in order to perform their duties and who will comply with relevant laws and policies, can have personal data disclosed to them. When forwarding personal data, the email must be encrypted or password protected.

You must contact your General Counsel (or an Authorized Delegate) immediately if you become aware of any unauthorized access to personal data, any theft or loss or if you receive a complaint or request from an individual regarding their personal data.

Please refer to the [Data Protection Policy](#) and the [Employee Privacy Notice](#) for additional information and seek guidance, if necessary, from your General Counsel (or an Authorized Delegate).

## Document Retention

In compliance with legal requirements, certain company records which includes documents, writings or recordings whether paper, electronic or in any other form, created or received in connection with the operations of Amcor must be retained, at a minimum, for specific periods of time. These should remain available for as long as they are required for business or legal purposes and should be discarded or destroyed once it is clear that they are obsolete and have no further business use.

Whenever it becomes apparent that documents of any type will be required in connection with a lawsuit or government investigation, all possibly relevant documents should be preserved and ordinary destruction of documents pertaining to the subjects of the litigation or investigation should be immediately suspended. If you are uncertain whether documents under your control should be preserved because they might relate to a lawsuit or investigation, you should contact your General Counsel (or an Authorized Delegate).

Please refer to the [Record Management Best Practices](#) for additional information and seek guidance, if necessary, from your supervisor or from your General Counsel (or an Authorized Delegate).





## Litigation and Claims

The Company, like all other businesses, is from time to time involved in disputes that may result in claims or litigation.

If you ever receive a legal document related to the Company, such as a summons, complaint, subpoena or discovery request, whether from a governmental agency or otherwise, you must immediately contact your General Counsel (or an Authorized Delegate) to ensure an appropriate and timely response. Do not respond to any request, answer any questions or produce any documents without first discussing with your General Counsel (or an Authorized Delegate). Also, it is not appropriate to attempt to list legal matters or pending litigation in vendor or supplier qualification forms, RFPs or RFQs or in any questionnaires.

Unless expressly authorized to do so, under no circumstance should you threaten or initiate legal action on behalf of the Company.

## IT Systems and No Expectation of Privacy

### Ownership of IT systems and data

IT resources provided by the Company are to be used in support of its business and any information or data stored, transmitted or processed using these resources is considered Company property. This includes, but is not limited to, Company-owned computers, laptops, tablets and mobile phones, email accounts provided by the Company, data stored on Company servers, cloud services or other storage devices and any information transmitted over the Company's network.

### No expectation of privacy and appropriate use of IT systems

Subject to local privacy laws, you should not have an expectation of privacy when using Company IT systems or resources. The Company reserves the right to monitor, access, review, track and disclose any information or data stored, transmitted or processed on its systems and resources at any time without notice.

Co-workers are expected to use the Company's IT resources responsibly and for legitimate business purposes. Any personal use permitted by Company policy must be occasional, minimal, incidental and not interfere with work requirements or violate any company policies. Examples of inappropriate use include:

- Storing or transmitting illegal, offensive, disruptive, defamatory or derogatory content
- Downloading or installing unauthorized software, computer games or pornography
- Attempting to access or "hacking" into Company systems to which you do not have access or into computer systems of third parties.

### Cybersecurity

Co-workers are responsible for protecting the Company against cyber threats. Non-Amcor devices are prohibited from connecting to the Amcor network.

Strong passwords should be used, security settings regularly updated and any security incidents immediately reported. Many cyber-attacks attempt to lure you into clicking on Internet links or malicious sites. Do not click links unless you are confident the link can be trusted.

Please refer to the [Acceptable Use Policy and I.T. Security Policy](#) for additional information and, if necessary, seek guidance from your supervisor, the IT department or your General Counsel (or an Authorized Delegate).

## Social Media and External Communications

### Social Media

Co-workers who use social media, whether on or off the job, must always use good judgment, be respectful and comply with Amcor policies.

While everyone is encouraged to speak freely about Amcor and our brands, only designated co-workers of the Corporate or Business Group Communications team are permitted to speak and post on behalf of Amcor. When sharing Amcor content, the post must follow Company policies, be accurate and have a clear purpose, it must represent Amcor positively reflecting "Being Amcor" and not contain personal or business-sensitive information. Any comments from a personal account should be identified as your own views and not that of the Company. Co-workers with a conflict of interest on a topic should refrain from communicating on it.

### Other external communication

All official releases pertaining to Amcor activities must be authorized, reviewed and approved by the appropriate Business Group or Corporate Communications lead, as applicable. Material that specifically comments on the financial or share trading performance of Amcor is to be approved by the Head of Investor Relations.

If you are contacted by the media or a regulatory body via any means, refrain from comment or communication and promptly inform your supervisor, who must immediately advise the Communications department or the relevant General Counsel.

Please refer to our [Communications Policy](#) for the required approvals and additional information regarding external communication, to the [Social Media Policy](#), [Acceptable Use Policy](#) and [Brand Policy](#) for additional information and, if necessary, seek guidance from your supervisor, the applicable Communications department, the Head of Investor Relations, the IT department or your General Counsel (or an Authorized Delegate) as appropriate.





# SOCIAL RESPONSIBILITY AND COMMUNITY

Amcor places great importance on the responsible organization of its supply chain and respects internationally recognized human rights.

## Human Rights

Amcor is committed to protecting and respecting human rights globally, including complying with all applicable laws regarding forced labor in all jurisdictions where it operates. This applies to our operations and to our supply chain. Please refer to our [Modern Slavery Statements](#) for additional information.

## Child Labor

The Company recognizes the rights of every child to be protected from economic exploitation and respects the laws of each country in which it operates in regard to minimum hiring age for co-workers. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment and the age established for completing compulsory education.

## Freely Chosen Employment

The Company does not and will not use forced, bonded, indentured or involuntary prison labor. We will not tolerate any form of physical punishment or abuse of workers and condemn practices of human trafficking, including enforcing illegal or excessive recruitment fees, delayed or withheld wages and the withholding of identity documents.

## Environment, Sustainability and Community

Amcor strives to be recognized as an environmentally responsible company that respects the environment and the communities in which it operates in compliance with all applicable laws. Please refer to our [Environment Policy](#) and [Sustainability Policy](#) for additional information.

## Environment and Sustainability

We are dedicated to sustainability as evidenced by our robust commitment to minimizing environmental impacts and developing more sustainable product solutions. The Company takes pride in working alongside NGOs, academic institutions and industry bodies to expand recycling infrastructure. This collaborative effort is part of Amcor's broader strategy, which includes informing consumers and driving participation in recycling and reuse systems. By sharing our technical expertise and engaging in educational initiatives, Amcor aims to empower consumers to make responsible choices and effectively use waste management infrastructure.

The Company's proactive approach includes stringent measures to reduce waste, emissions and discharges emanating from our operations and to continually improve year on year. By focusing on the environmental footprint of both our operations and products, Amcor strives for continuous improvement in natural resource efficiency.

This commitment is further reinforced by the implementation of comprehensive risk management processes designed to mitigate environmental hazards associated with our activities.

Amcor's commitment to net zero emissions by 2050 and to significantly increasing the purchase of post-consumer recycled material, reflects our ongoing dedication to environmental and sustainability programs.







## Community

Amcor strives to be a trusted corporate citizen and to operate in a manner that encourages lasting, beneficial and interactive relationships with the communities in which it operates.

Amcor has demonstrated a strong commitment to community involvement, focusing on creating a positive impact through various initiatives. Our efforts range from purpose-driven programs to volunteer work, clean-up operations and disaster relief, all aimed at fostering value and driving positive action for both people and the planet. These actions reflect Amcor's dedication to enhancing lives and building stronger communities through active engagement and support.

Each Amcor location is encouraged to offer volunteering opportunities to co-workers in compliance with local regulations and legislation. Our Corporate volunteering guidelines are designed to help co-workers channel collective energy and passion into initiatives that align with our Company's values and Winning Aspiration.

## Amcor Suppliers

Amcor expects all parties it deals within its supply chain to observe the core principles contained in this Code and to abide by the same ethical standards. The **Suppliers' Code of Conduct** highlights and specifies those provisions of the Code that are of particular relevance to suppliers.

Amcor suppliers, including their employees, agents, suppliers and sub-contractors must respect and adhere to the Suppliers' Code of Conduct when conducting business with Amcor and enact similar measures in their supply chain where necessary.

The Company reserves the right to terminate any relationship with a supplier or business partner who is in breach of the Suppliers' Code of Conduct. Monitoring should be ongoing and any non-compliance must be reported.

## Political Involvement

The Company may represent its views to governments and other third parties on matters that affect its business interests and the interests of its shareholders, co-workers and others. However, the Company may not participate in party politics or make payments to political parties without the prior approval of the Board. Under no circumstances will the Company (or any co-worker of the Company), in order to assist the Company in obtaining or retaining business for or with, or directing business to, any person, make any payment to any political party or official of that party or candidate for public office for the purpose of:

- influencing any act or decision of that party, official or candidate in its official capacity;
- inducing that party, official or candidate to do or omit to do an act in violation of its lawful duty;
- securing any improper advantage; or
- inducing that party, official or candidate to use its influence with a government or instrumentality of that government to affect or influence any act or decision of such government or instrumentality.

Co-workers may not make any political contribution as a representative of the Company nor may they request reimbursement from the Company for any political contribution made.

## SEEKING GUIDANCE

If you have any questions about the Code or are unsure how to apply its principles in specific situations, you are encouraged to seek guidance.

You can reach out to your supervisor, HR representative or your General Counsel (or an Authorized Delegate) for clarification. It is important to ask questions early to ensure actions align with the Company's values and policies. If you are unable to get answers or feel uncomfortable discussing an issue directly, you can escalate the matter by raising it with any member of the management team, the Corporate General Counsel or through the Company's Whistleblower service.





# REPORTING WRONGDOING AND PROTECTION AGAINST RETALIATION

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 of this Code.

The Company expects co-workers to report information about known or suspected wrongdoing to (i) their supervisor or any member of management; (ii) the Group Internal Audit, Human Resources, Legal or Health and Safety representative for their Business Group; or (iii) the Company's independent, externally managed whistleblower service at <http://www.amcor.com/whistleblower> for co-workers to anonymously, where permitted by local law, report any potential incidents of misconduct.

Investigations of allegations of wrongdoing will be conducted in a manner that is confidential, fair and objective and co-workers are expected to co-operate with any investigation that Amcor undertakes.

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, is a serious violation of this Code and will not be tolerated. Acts of retaliation should be reported immediately and will be disciplined appropriately.

Co-workers who submit a complaint in bad faith may face disciplinary action, including termination.

Please refer to the **Whistleblower Policy** for additional information and, if necessary, seek guidance from your supervisor or your General Counsel (or an Authorized Delegate).





# ANNEX OF SUB-POLICIES







Code of Conduct section	Policy title	Link
Introduction	Being Amcor	<a href="#">Amcor's Values</a>
Workplace health and safety	Safety Policy	<a href="#">Amcor Safety</a>
	Mobile Telephone and Device Use Policy	<a href="#">Mobile Telephone and Device Use</a>
Substance Abuse	Drug and Alcohol Policy	<a href="#">Drug and Alcohol</a>
Conflicts of Interest	Related Party Transactions Policy	<a href="#">Related Party Transactions</a>
	Delegated Authority Policy	<a href="#">Delegated Authority</a>
Insider Trading	Insider Trading Policy – all personnel	<a href="#">Insider Share Trading – All Personnel</a>
	Insider Trading Policy – Senior and key personnel	<a href="#">Insider Share Trading – Senior Personnel</a>
	Code of Ethics for Senior Financial Employees	<a href="#">Code of Ethics for Senior Financial Employees</a>
	Minimum Shareholding Policy	<a href="#">Minimum Shareholding</a>
Anti-Bribery and corruption	Anti-Bribery and Corruption Policy	<a href="#">Anti-Bribery and Corruption</a>
Anti-Trust and Competition	Competition policies	<a href="#">Competition Compliance</a>
Sanctions	Trade Compliance Policy	<a href="#">Trade Compliance</a>
Intellectual Property	Intellectual Property Policy	<a href="#">Intellectual Property</a>
Data Privacy	Data Protection Policy	<a href="#">Data Protection</a>
	Employee Privacy Notice	<a href="#">Employee Privacy Notice</a>
IT Policies	Acceptable Use Policy (Use of IT and other company resources and IT mobile device policy)	<a href="#">Acceptable Use</a>
	I.T. Security Policy	<a href="#">I.T. Security</a>
	Amcor Mobile Device Policy and Procedures for Amcor Enterprise Owned Devices	<a href="#">I.T. Amcor Mobile Device Policy</a>
Records Management	Record Management and Best Practices	<a href="#">Record Management Best Practices</a>
External communication	Communications Policy	<a href="#">Communications Policy</a>
	Brand Policy	<a href="#">Brand Policy</a>
	Social Media Policy	<a href="#">Social Media Policy</a>
Human Rights	Modern Slavery Statements	<a href="#">Modern Slavery Statements</a>
Environment, Sustainability and Community	Environmental Policy	<a href="#">Environmental Policy</a>
	Sustainability Policy	<a href="#">Sustainability Policy</a>
Suppliers' Code of Conduct	Suppliers' Code of Conduct – Global	<a href="#">Suppliers' Code of Conduct - Global</a>
	Suppliers' Code of Conduct - EMEA	<a href="#">Suppliers' Code of Conduct - EMEA</a>
Reporting wrongdoing	Whistleblower Policy	<a href="#">Whistleblower Policy</a>





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