

Fighting Against Forced Labour and Child Labour in Supply Chains Act - 2023 Report

Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Supply Chains Act") requires certain entities to report on steps taken during the previous financial year to prevent and reduce the risk that forced or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.

For the purposes of the Supply Chains Act, this report, read in concert with Orora Modern Slavery Statement 2023 ("Orora MSA") attached hereto as Appendix 1, comprises Landsberg Canada Inc's Supply Chains Act Report (the "2023 Report"). The 2023 Report is made on behalf of Landsberg Canada Inc. and Orora Packaging Solutions (together, the "Orora Companies"), whose financial years ended on June 30, 2023.

The Orora MSA outlines the policies, procedures and activities that are adopted and implemented by the Orora Companies to identify, mitigate, and remediate human rights risks in their supply chain. The Orora MSA addresses the prescribed topics pursuant to section 11(3) of the Supply Chains Act as identified in the below concordance table.

Prescribed Information	Orora MSA Section
Orora Companies' policies and due diligence processes in relation to forced labour and child labour.	Sections 5.2, 5.3, 5.5 and 5.6
Parts of Orora Companies' business and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk.	Section 5.5
Measures taken by Orora Companies to remediate forced labour or child labour.	Section 5.8, see additionally section 3 below.
Training provided to Orora Companies' employees on forced labour and child labour.	Section 5.7
How Orora Companies assess their effectiveness in ensuring that forced labour and child labour are not being used in their business and supply chains.	Section 6

1. Orora Companies' Policies, Procedures and Programs

The Orora Companies implement the Orora Group's policies, procedures and programs throughout their operations as set forth in more detail in the Orora MSA.

2. Structure, Operations and Supply Chain

Landsberg Canada Inc. located in Ontario, Canada, is a subsidiary of Orora Packaging Solutions, a California corporation ("OPS"). OPS's headquarters is at 6600 Valley View Street, Buena Park, California, 90620, USA. Landsberg's offices are located at 1938 Road 3 East, Kingsville Ontario N9Y 2E5 Canada.

OPS is a global packaging and visual communications company leading the transition to a more sustainably packaged future. OPS is a fully integrated total packaging solutions provider with locations across North America, Europe and Asia, a market leader in designing custom packaging solutions and offers

a broad range of commodity packaging and stock packaging products. Landsberg carries out activities related to these packaging solutions, on behalf of OPS, in Canada.

Landsberg Canada Inc. operates under the trade name Orora Fresh. Orora Fresh offers comprehensive packaging solutions tailored for the fresh produce Industry. As the single-source provider from harvest to distribution, Orora Fresh specialize in consolidating rigid, corrugated, and flexible packaging options. Located in Kingsville, the Orora Fresh facilities provide corrugated assembly services, label manufacturing, and packaging warehousing.

Landsberg Canada Inc. has also recently expanded into the retail supplies distribution business in Canada, distributing retail supplies to a customer with 132 locations across Canada. The goal is to grow this retail supplies distribution business throughout Canada.

The Orora Companies import and sell packaging products to a broad range of industries including agriculture, technology, food & beverage, pharmaceutical and automotive. The Companies focus heavily on customer service and value-added services and are best known for delivering customized, value-added packaging solutions to a wide variety of customers. More information on the Orora Companies' supply chain is included in Section 4 of the Orora MSA, in particular, the description of the Orora Companies' global supply chain is included in section 4.2.2. As noted in the Orora MSA, packaging solutions are procured through a global supply chain, and are then imported into the Orora Companies' respective jurisdictions, the US and Canada.

3. Remediation Measures

For the financial year ending June 30, 2023, Orora Companies' have not identified any incidents of forced labour or child labour in their activities or its supply chain, and therefore did not need to take any measures to remediate or eliminate the use of forced labour or child labour, or to address any resulting loss of income to vulnerable persons. The Orora Group MSA includes information with respect to the Orora Companies' remediation and grievance measures, generally, in section 5.8.

4. Approval and Attestation

This report was approved by the Boards of Directors of Orora Packaging Solutions in accordance with section 11(4)(b)(ii) of the Act.

Signature: 

Full Name: Colleen Connelly

Title: General Counsel and VP, Quality & Compliance

Date: May 20, 2024

I have authority to bind Orora Packaging Solutions

The background of the cover features a photograph of a laboratory setting. In the foreground, several clear glass test tubes are arranged in rows on a dark surface. The background is slightly blurred, showing more laboratory equipment and a bright light source. The overall color palette is dominated by shades of orange and red, with the text and logo in white.

Orora
Modern
Slavery
Statement
2023

About This Statement

Orora Limited (Orora) is pleased to submit its Modern Slavery Statement for the financial year ending 30 June 2023 (FY23), as required under the Australian Commonwealth Modern Slavery Act 2018 (Act).

We have prepared this statement on a consolidated basis for Orora together with its subsidiaries (Orora Group) – although not all of the entities in the Orora Group are subject to the Act.

This joint statement should be read in conjunction with Orora's other periodic and continuous disclosure announcements lodged with the ASX, including our FY23 Annual Report, incorporating our Corporate Governance Statement, which is available at www.ororagroup.com/investors.

The meaning of modern slavery, as defined in the Act, is adopted within this statement. This encompasses a spectrum of offenses, such as slavery, servitude, forced labour, debt bondage, forced marriage, human trafficking, deceitful recruitment tactics for labour and services, as well as the most severe forms of child labour.

Each year, our statements will build upon the depth of our previous modern slavery work. Appendix 1 to this statement provides a summary table showing where we have met the mandatory criteria of the Act within this statement.

Appendix 2 to this statement contains details on the entities that are included in this joint statement, the reasons why a joint statement is appropriate for Orora, and the process of consultation with entities covered by this statement.

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ACKNOWLEDGMENT OF COUNTRY

Orora extends its heartfelt acknowledgment to the First Nations peoples, the Traditional Custodians of the bountiful lands and waters that encompass our daily lives and workplaces. We honour the enduring connection of Aboriginal and Torres Strait Islander communities to these ancestral lands, where we all live, labour, and enjoy our shared existence. Our deepest respects are conveyed to the Elders, both past and present, as well as those who are emerging to carry forward the wisdom and heritage of these ancient cultures.

A Message from the Managing Director and CEO



I am honoured to introduce Orora Limited's Modern Slavery Statement for this financial year. As the Managing Director and CEO of Orora, I am committed to fostering an organisation that not only excels in its business endeavours but also upholds the highest ethical standards.

Modern slavery remains a global challenge that affects countless individuals and communities, and we acknowledge that we have a duty in addressing this issue within our sphere of influence. We are mindful that our operations span the globe, and with such reach comes a responsibility to strive to ensure that our supply chains are free from any form of exploitation or forced labour.

In the pages that follow, you will find a comprehensive overview of our commitment to reducing risks of modern slavery, the steps we have taken to identify and mitigate these risks within our supply chains, and the actions we are taking to drive positive change in this area. We recognise that transparency is the cornerstone of accountability, and this report demonstrates our dedication to these principles.

Our responsible business practices are firmly embedded in our corporate culture. As such, we continually strive to improve our policies, procedures, and due diligence processes to ensure that we identify and address any potential issues related to

modern slavery. We understand that this journey is continuous, and we will adapt our approach as the landscape changes.

I want to express my gratitude to all our team members, suppliers, and partners who have contributed to our initiatives in addressing modern slavery risks. Your commitment to ethical conduct and shared values is essential in driving progress. Together, we can make a tangible impact towards a fairer world.

I invite you to delve into the contents of this statement and encourage feedback and dialogue from all our stakeholders. We believe that joint efforts are essential in our shared mission to eliminate modern slavery from our collective supply chains.

Thank you for your continued support and trust in Orora. Together, we can work towards creating a brighter and more just future for all.

This statement was approved by the Board of Orora Limited as a reporting entity and as the parent company of Orora Packaging Australia Pty Ltd on 29 November 2023.

Brian Lowe
Managing Director and CEO

Summary of Key Activities in FY23

The table below summarises our FY23 progress based on the FY22 Modern Slavery Statement. For more information on upcoming actions and our strategy for addressing modern slavery risks, please refer to Section 7.

	FOCUS for FY23	Progress during FY23
High Risk Industry Sector Review (Labour Hire / Cleaning Services)	Complete our review of existing labour hire and cleaning service providers to our Australasian and North American businesses, and determine mitigation plans or ongoing engagement with suppliers who are assessed as high risk following our SAF and SAQ assessment, and SEDEX/ EcoVadis assessment as necessary, or do not co-operate with us to undertake this process.	During the FY23 year, all our labour hire and cleaning service providers were risk assessed using a third-party professional consultancy, and all were deemed to be operating in the lower to medium class risk categories, that did not require any further due diligence. These suppliers will continue to undergo due diligence periodically as we strengthen our SAF programs.
High Risk Country Supplier Review (China & Mexico)	Commence our review of suppliers located in Mexico and China to our North American OPS business, and request any suppliers determined as high risk to go through our SAF and SAQ process, and if required to undertake a SEDEX assessment.	A thorough review of our Chinese and Mexican suppliers to our OPS business were reviewed by a third-party professional consultancy, with 3 key suppliers returning a high risk. In the FY24 year, these suppliers will be required to undertake our SAQ in the first instance, and pending response, further due diligence processes such as completion of a SEDEX assessment will be required.
Completion of Supplier Assurance Framework (SAF) – ANZ	Complete our SAF as an automated on-boarding requirement for all new suppliers to our Australasian business.	This project was successfully implemented, and all new suppliers to the business are now on-boarded through the SAF program. While a few suppliers were required to further complete our SAQ following the SAF, none were deemed to be at a risk level that warranted further due diligence.
Developing our Supplier Assurance Framework (SAF) – North America (NA)	Continue the risk profile review of our North American OPS businesses, to enable us to gain a better insight into any instances or risks of modern slavery within those operations or their complex supply chains and determine the most effective way to fully implement our SAF into our North American procurement practices.	The risk profile review particularly informed the work conducted on the geographically at-risk suppliers and the labour hire and service providers. This in turn helped inform an appropriate strategy towards developing a SAF program for the OPS business. This will continue to be developed in the FY24 year.
Global Training	Implement further mandatory general awareness modern slavery training for all global team members, in addition to Group human rights and modern slavery awareness campaigns.	Global training material was developed and implemented into various systems within the business. In particular, awareness campaigns were made available via e-screens and town-halls, and training material was developed for the online training hub, both in English and in Spanish. In FY24, it is anticipated that all staff with access to the e-learning training hub will have completed this training.

SAF – Supplier Assurance Framework

SAQ – Supplier Assessment Questionnaire

Orora Structure, Operations and Supply Chain

4.1 We Are One Orora

Orora is a public company listed on the Australian Securities Exchange (ASX:DRA) and is headquartered in Melbourne, Australia.

Our purpose is to be a leading sustainable packaging solutions provider, designing and delivering products and services that enable our customers' brands to thrive.

In FY22, the launch of "One Orora" redefined our collective identity as Orora today. We acknowledge the common bonds that unite us across the Orora Group, encompassing our promise, our purpose, and our commitment to executing our strategy. These values guide our actions, always grounded in our core principles. This figure illustrates our One Orora approach.



While our primary operations are based in Australia, New Zealand, and North America, we collaborate closely with customers worldwide to offer a diverse range of customised packaging and visual communication solutions. These solutions encompass the production, design, and supply of packaging items such as glass bottles, beverage cans, corrugated boxes, point-of-purchase displays, and health, safety, and facility

supplies. Furthermore, we provide comprehensive end-to-end packaging solutions and complementary services, including global product sourcing, distribution, design, printing, and warehouse optimisation. Each day, millions of consumers purchase and use products packaged with pride, thanks to Orora's involvement in their design, development, manufacture, or supply.

4.2 Our Operations and Supply Chains

4.2.1 Our Global Operations

We operate a portfolio of two businesses across two key geographic segments.

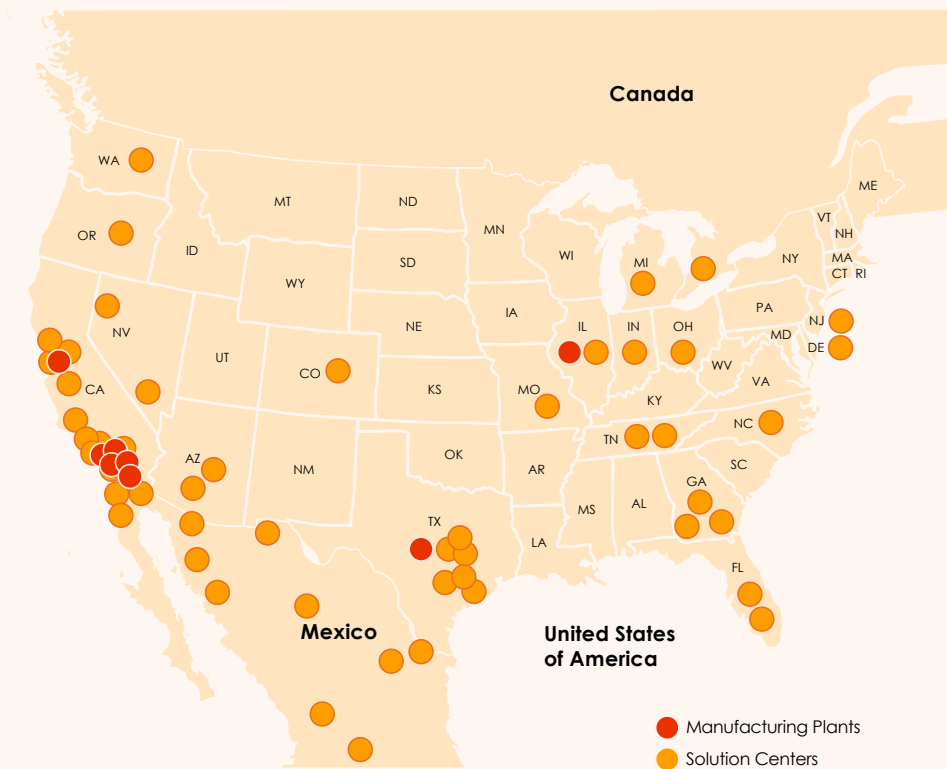
	Beverage	OPS
Operations	<p>Across Australia and New Zealand Orora Beverage provides innovative, state-of-the-art packaging design and manufacturing solutions to customers in the beverage industry. Working within three specialist business units in Glass, Cans and Closures, we craft and produce the glass bottles, aluminium cans, tabs and ends, closures and caps that keep consumers' favourite beverages safe for transportation and consumption.</p>	<p>Orora Packaging Solutions (OPS) leads the US market in custom packaging design, equipment, automation and supply chain optimisation across a broad range of sectors, including food and beverage, industrial, warehouse and shipping, healthcare and beauty, technology and automotive. We also provide creative, cutting-edge visual and product marketing solutions, including point-of-purchase displays, promotional signage and consumer packaging.</p>
Locations	Australia and New Zealand	United States of America, Mexico, Canada
Direct Supply Chain Categories	<ul style="list-style-type: none"> Raw materials (soda ash, sand, cullet, limestone, other chemical products supporting glass manufacturing, aluminium, inks, metal treatments and varnishes for cans and closures manufacturing) Packaged materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs) Indirect goods and services (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods) Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations) 	<ul style="list-style-type: none"> Raw materials (paper, inks, adhesives, other chemical products supporting corrugated and printing manufacturing, plastic sheets, specialty or name brand print media, corrugate mounting sheets) Direct materials (Corrugated & Resin custom converted products, Food Containers, Warehouse, Office, Facility Supplies & Machinery) required to support customer requirements) Indirect goods and services (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods, IT hardware and software) Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations) Packaged materials (strapping, films, corrugated boxes, tapes and other contract manufactured materials required to support customer needs)
Employee by Contract Type [%]	<ul style="list-style-type: none"> Full time Part time Contractor 	<ul style="list-style-type: none"> Full time Part time Contractor
Women Represented [%]	<p>20% of employees*</p>	<p>33% of employees*</p>

*Excluding contractors

Beverage



OPS



4.2.2 Our Global Supply Chain

Orora has a large, geographically diverse and complex supply chain to support our Australasian and North American businesses.

Our operations are supported by:

- raw materials (those which are used in the process to manufacture our packaged products)
- packaged materials (those which are procured to meet our customer requirements, but not manufactured by us)
- indirect goods and services (which are all other materials which are incidental to our business, including technology hardware and consumables such as personal protective equipment and office supplies)
- skilled labour and services.

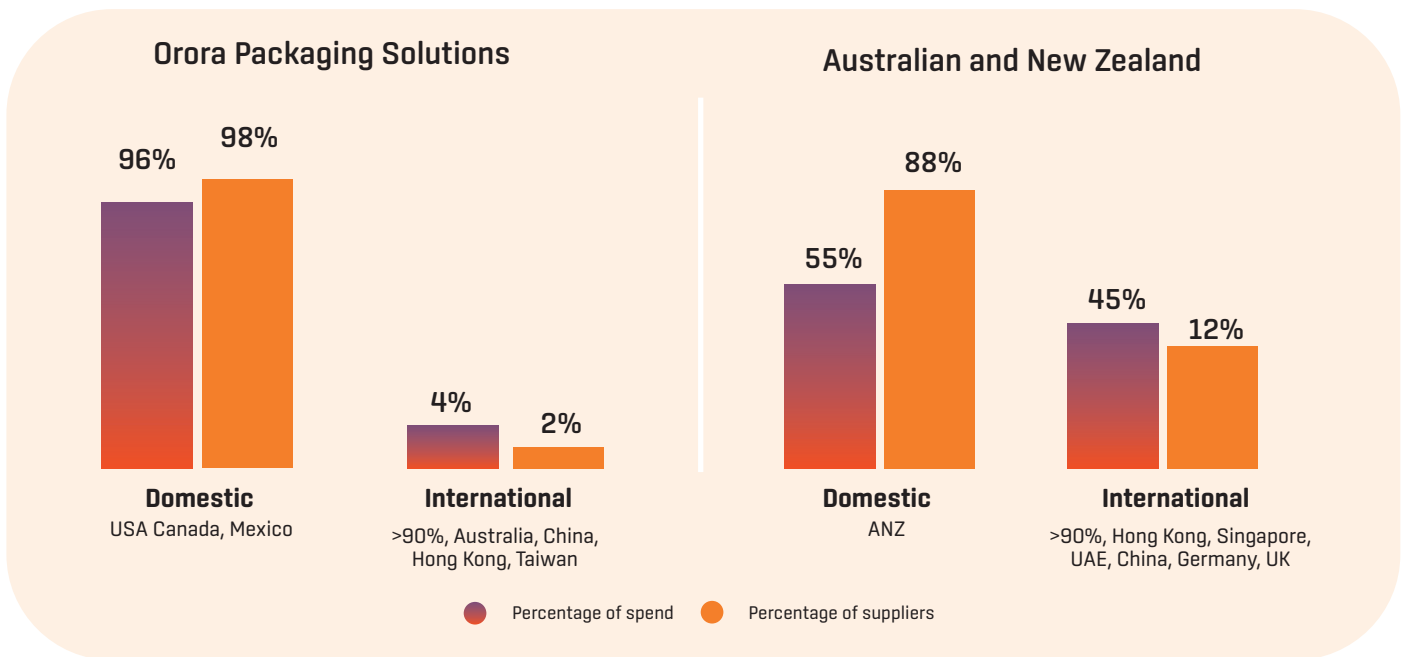
In FY23, Orora and its controlled entities purchased goods and services from over 7,500 suppliers across 55 countries.

In our Australasian operations, more than 55% of our total expenditure is dedicated to the ANZ region, in addition to 88% of our suppliers being sourced locally. This includes the countries of Australia and New Zealand, which are integral components of our operational focus. The remaining portion of our financial commitments extends to overseas territories, comprising Hong Kong, Singapore, the United Arab Emirates, China, Germany, and the United Kingdom of Great Britain. Together, these international locations collectively represent over 90% of our international expenditure. This diverse global reach underscores our commitment to sourcing and operating on an international scale, serving the needs of our clients and partners in various regions.

Moving to our North American OPS business, a significant majority of our spending, exceeding 90%, is channelled into the United States.

The U.S. market plays a pivotal role in our North American operations and holds a substantial share of our investment. Additionally, approximately 6% of our expenditures are evenly distributed between Mexico and Canada, demonstrating our presence and engagement in these neighbouring countries. The remainder of our international supplier relationships is mainly established with partners from Australia, China, Hong Kong, and Taiwan, collectively comprising more than 90% of our overall international financial outlay. This diverse network of international connections emphasises our dedication to global partnerships and supply chain management. Simultaneously, we recognise that these partnerships may carry potential modern slavery risks. We actively engage with our supply chain partners, working collaboratively to identify and mitigate these risks, ensuring responsible and ethical practices across our global operations.

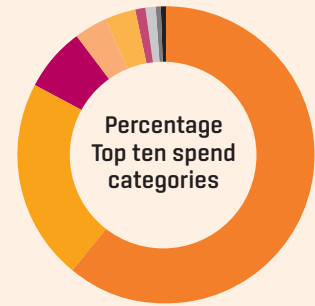
International vs Domestic suppliers and % spend FY23



The following charts depict our primary spending categories and highlight some of our key high-risk sectors, notably in raw materials and packaging materials, as well as logistics. Further elaboration on these risk factors can be found in Section 5.5.

Top categories of spend for OPS

- **53%** Packaging Materials
- **15%** Raw Materials
- **9%** Facility and MRO Supplies
- **9%** Packaging Equipment
- **7%** Logistics and shipping
- **7%** Packaging
- **5%** Human Resources
- **2%** Services and Charges Indirect
- **2%** Suppliers
- **2%** MRO



Packaging Materials – Products purchased to resell to customers – Cartons, Tape, Stretch Film, Facilities Supplies.

Raw Materials – Products bought to be consumed in manufacturing processes - Paper Rolls, Corrugated Board, Starch.

Facility and MRO Supplies – Electrical Supplies, Belts/Pulleys, Lubricants and coolants, Chemicals, Uniforms, Safety Supplies.

Packaging Equipment - Conveyors, Carton erectors, Stretch wrappers, Automated tape equipment, Paper dunnage equipment, on demand bubble production

Logistics and shipping - 3rd party freight and couriers, Fleet vehicle leases, Driver Labour, Fuel

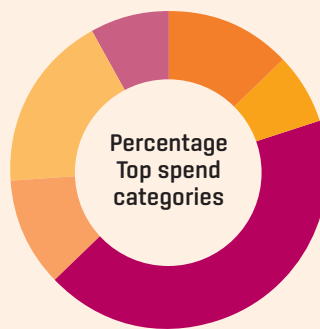
Packaging – Shipping and packaging supplies for internal use (Manufacturing primarily) - Pallets, Strapping, Foam cushioning.

Human Resources – Staffing and Recruiting, Background Reporting, Benefits

Services and charges – 3PL Storage, Security, Subcontracting Services

Top categories of spend for ANZ

- **13%** Capital
- **7%** Corporate Indirect
- **43%** Direct Materials
- **11%** Logistics
- **18%** MRO
- **8%** Utilities



Corporate Indirect – Employee & HR Services/ IT & Telecoms/ Office & Printing Supplies/ Professional & Legal Services/ Property/ Travel

Logistics – Couriers/ Ocean & Air/ Rail/ Road/ Warehousing

Utilities – Rent/Coal/ Diesel/ Electricity/ LNG/ LPG Gas/ Water/

Capital – Ancillary Equipment/ Building & Construction/ Demolition/ Production Machinery/ Remediation

MRO – Electrical Parts/ Flexible Film/ Forklift/ Industrial Chemicals/ Labour/ Machine Consumables/ Mechanical Parts/ Outsourced Services/ Packaging/ Pallets/ Plant Maintenance/ Poly Products/ Recyclables/ Safety/ Site Services/ Traded Products/ Waste & Waste Treatment

Direct Materials – Alumina/ Aluminium/ Capsules/ Chemicals/ Chromite/ Coal and Coke/Coatings / Cobalt Oxide/ Cullet/ Inks/ Iron Oxide/ Limestone and Lime sand/ Liners/ Plant Quality/ Salt-Cake/ Sand/ Selenium/ Soda-Ash/ Sodium Feldspar/ Traded Products

Identifying modern slavery risks and our due diligence approach

5.1 Our Approach and Commitment

The protection of our people and human rights is a core component of our sustainability strategy and focus.

Sustainability is at the heart of Orora's overarching approach as we pursue our strategic objectives, striving to minimise our societal and environmental footprint, while preserving the trust and backing of our people and the communities we serve—both today and for generations to come.

Our sustainability endeavours, as illustrated below, are thoughtfully guided by our three-pillar sustainability strategy: Circular Economy, Climate Change, and Community. This strategy stands as our unwavering "promise to the future" and harmonises seamlessly with the

expectations of our key stakeholders and our responsibilities as signatories to the United Nations Global Compact (UNGC). We continually monitor, diligently manage, and transparently report our progress across various indicators. These metrics serve as a barometer to gauge the effectiveness of our responsible business initiatives and performance. Detailed progress updates against these metrics can be found within our Annual Report, which also encompasses our Corporate Governance Statement, and we encourage its consideration in tandem with this statement.

Within our sustainability framework, the safeguarding of our people and the promotion of human rights are intrinsic to our Community pillar. At Orora, we unequivocally denounce all forms of slavery, both within our operations and throughout our supply

chain. Our commitment extends to the identification, assessment, and mitigation of human rights impacts, as well as the provision of accessible remedies through robust grievance and complaint mechanisms. We remain steadfast in our pursuit of continuous improvement to fortify our actions in this vital area. While, to date, we have not encountered instances of modern slavery within our operations or supply chains, this statement articulates our continued diligence in searching for any such indications.

For more comprehensive insights into our approach to sustainability, we encourage you to explore www.ororagroup.com/investors and visit our website at www.ororagroup.com/sustainability.

Our Promise to the Future



Circular Economy

- Recycled content
- Recyclable packaging
- Recyclable substrates
- Certification



Climate Change

- GHG reduction
- Energy efficiency
- Renewable energy
- Climate risk analysis



Community

- Safety and health
- Diversity, equity and inclusion
- Human rights and supply chain
- Responsible sourcing

5.2 Our Human Rights Due Diligence Framework

Orora firmly upholds the belief that addressing modern slavery is intrinsically linked to a wider spectrum of human rights concerns. Consequently, we seamlessly incorporate modern slavery risk management into our overarching efforts to uphold human rights, a commitment that extends to our Supplier Assurance Framework. Taking a holistic approach to addressing these issues supports us in identifying system root causes and implementing solutions that address interconnected problems. Our Human Rights Due Diligence Framework at Orora is depicted below and aligns with Orora's enterprise risk management framework. This integrated risk management framework incorporates the principles of effective risk management, as set out in the ISO3100 Global Risk Management Standard.

Our Human Rights due diligence framework follows a cyclical approach, with the aim of fostering sustainable outcomes and facilitating ongoing improvements, both within our organisation and in collaboration with our suppliers.

Our Framework serves as a pivotal instrument for detecting and evaluating modern slavery risks within our supply chain. This assessment procedure commences with a supplier screening that factors in country and category risks, culminating in the assignment of an initial risk rating. Subsequently, the supplier may be requested to fill out a Supplier Assessment Questionnaire (SAQ), designed to acquire more comprehensive insights into the operation of their business. The SAQ is structured to capture pertinent details concerning critical modern slavery concerns and risk indicators, and upon its successful completion, it results in the assignment of a final risk rating. The SAQ comprises inquiries of our suppliers pertaining to:

- Indicators of Modern Slavery: internal assessment of modern slavery within our suppliers' operations, including understanding their employment conditions, an understanding of their worker demographics and any third-party social audits conducted (e.g., SMETA).

- Modern Slavery Management: Any mandatory or voluntary reporting of Modern Slavery risks, the availability or absence of Policies and Processes including but not limited to: Code of Conduct and Ethics Policy, Workplace Health and Safety Policy, and/or Whistleblower Policy.
- Engagement and due diligence, including governance and risk management pertaining to modern slavery risks, including appropriate grievance mechanisms.

We promote supplier responsibility by incorporating modern slavery expectations into our Supplier Code of Conduct. Our contracts also feature standard clauses that require suppliers to proactively identify and remove instances of modern slavery in their own supply chains. To bolster risk identification, our supplier due diligence process may also encompass desktop assessments, adverse media checks, and third-party assistance.

In FY22, we initiated supplementary supplier due diligence for our North American OPS business, focusing on high-risk countries associated with our suppliers. Throughout FY23, this due diligence extended to 281 of our Tier 1 suppliers. In FY24, we plan to expand upon this initial effort by conducting further due diligence on suppliers flagged for their potential high-risk regarding modern slavery within their supply chains. As we continually enhance our understanding of our extensive supply chain and the associated modern slavery risks, we remain dedicated to identifying opportunities that enable us to proactively influence our suppliers' methods for addressing modern slavery risks.



5.3 Our Governance

The Board is committed to achieving and demonstrating standards of corporate governance appropriate to the operations and size of the Company, and continuing to refine and improve Orora’s governance framework and practices to ensure they meet the interests of shareholders and other stakeholders.

The Orora Board of Directors holds the belief that sound corporate governance is an essential component of the Company’s culture and operational principles. This contributes to Orora’s performance and, in turn, enhances shareholder value, all while acknowledging the interests of various stakeholders within an appropriate risk and return framework. Within the context of Human Rights, our governance is structured as per below:

Orora Board and Executive Leadership Team

The Orora Board and Executive Leadership Team (ELT) are accountable for leading and promoting risk management throughout the organisation. The Board also oversees modern slavery risks and ensures timely disclosures and corporate reporting in accordance with applicable laws and our risk management framework.

Audit and Risk and Compliance Committee

Our assurance function, including Internal Audit, critically evaluates the efficiency of our compliance and control systems, including risk management. Any findings from these assessments are reported to the Board’s Audit, Risk, and Compliance Committee, and necessary actions are implemented to reinforce our robust control framework.

Safety, Sustainability & Environment Committee

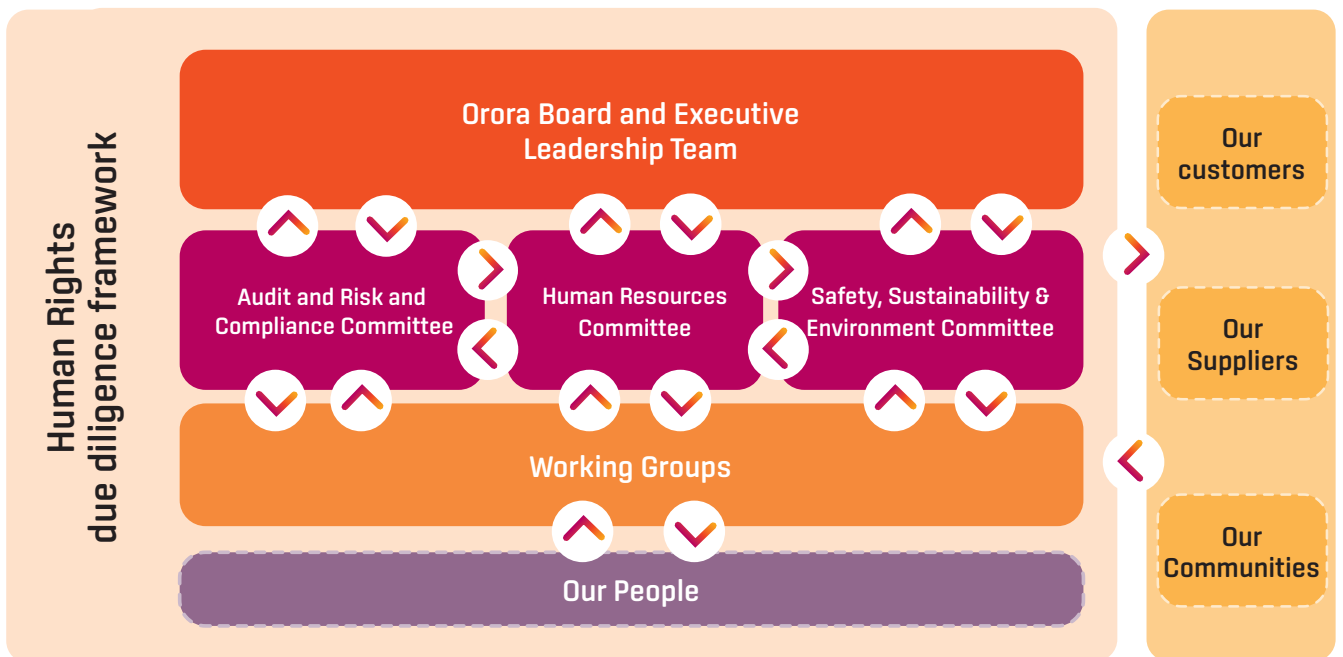
This Board Committee is ultimately responsible for overseeing the approach and management of human rights issues including modern slavery risk mitigation across the business.

Human Resources Committee

The Human Resources Committee assists the Board in overseeing its responsibilities in relation to the Company’s people and culture policies and practices.

Modern Slavery Working Group

The working group is responsible for the development and implementation of the Human Rights Due Diligence framework across the business, and to ensure compliance with applicable laws and standards. The group reports and provides recommendations via the ELT to the Committees, who provide recommendations to the Board.



Our Policies and Processes

We maintain a robust framework of governance documents that outline the expectations for both our team members and suppliers. Our unwavering commitment lies in the ongoing enhancement of our policies and procedures to mitigate the risk of modern slavery in both our operations and supply chains.

Code of Conduct and Ethics Policy (Code)

The Code outlines our commitment to conducting business in an ethical and transparent manner at all times. Our Code establishes the standards we demand from all our team members and representatives, setting a benchmark for upholding the highest standards in human rights. Additionally, our Code affirms our dedication to collaborating with third parties who share our ethical principles and behavioural standards.

Working with Respect Policy

This policy reinforces our commitment to cultivating a workplace environment characterised by a zero-tolerance approach of all forms of harassment, bullying, discrimination, victimisation, or vilification. We believe in the fundamental principles of equality, dignity, and respect for all individuals within our organisation, fostering a culture of inclusivity and professionalism.

Diversity & Inclusion Policy

Orora is dedicated to fostering an inclusive workplace that celebrates and champions diversity. We firmly believe that the success of the Orora group is intrinsically tied to our ability to attract the most exceptional talent, each contributing their unique perspectives and experiences while aligning with our core values. This policy articulates the guiding principles and goals for achieving diversity, equity, and inclusion throughout Orora, and is applicable to all members of the Orora team.

Integrity Reporting Service – (Whistleblower) Policy

Orora is committed to promoting ethical and honest behaviour and ensuring that team members feel safe and secure in their work environment. This policy outlines the procedures for reporting concerns regarding suspected unlawful or unethical behaviour, encompassing activities related to modern slavery, as well as suspected violations of any of Orora policies or Codes. It also explains Orora's response mechanisms for handling Whistleblower disclosures, including the protective measures in place for those who report such concerns.

Supplier Code of Conduct

The Supplier Code of Conduct defines the criteria we expect our suppliers to follow regarding modern slavery, alongside a more comprehensive spectrum of human rights, social, environmental, and governance concerns. It requires that suppliers avoid participating in activities that may cause or contribute to modern slavery.

Responsible Sourcing

Orora has made a commitment to source our products and services in a traceable, as well as socially and environmental responsible manner. We utilise tools such as SEDEX and Forest Stewardship / Chain of Custody, as examples of our responsible sourcing practices.

5.4 The UN Guiding Principles on Business and Human Rights (UNGPs)

In alignment with the UNGPs and the official guidance provided by the Australian Government on the Act, we interpret modern slavery risks as the potential for us to, 'cause', 'contribute to,' or be 'directly linked to' modern slavery*. Detailed explanations of these terms are provided in the table below. To identify and assess modern slavery risks within our operations and supply chain, we employ the UNGPs continuum of involvement as a framework to ascertain whether we might be responsible for causing, contributing to, or being directly associated with any harm related to modern slavery.

Key Term	Explanation	Hypothetical Examples
Cause	A business may cause an adverse human rights impact, such as modern slavery, where it causes the impact through its own activities or omissions.	<p>For example, if a packaging company directly engaged children in hazardous forced labour and deception recruitment practices.</p> <p>At Orora, we have very stringent internal processes in place to ensure that child labour is not used anywhere within our organisation, including verifying the age of our workers upon recruitment. These controls include our suite of governance processes and policies.</p>
Contribute	A business may contribute to an adverse human rights impact, such as modern slavery, where its actions or omissions facilitate or incentivise the impact to the extent that it would have been unlikely to occur without them.	<p>For example, in the case of a packaging company, a contribution to modern slavery might occur if it mandates its suppliers to achieve cost reductions to a degree attainable only through the use of forced labour.</p> <p>At Orora, we take measures to manage our modern slavery risks within our supply chain via our Human Rights Due Diligence Framework and in line with our Code of Conduct and Ethics Policy to ensure we do not contribute to adverse human rights impacts. Further, we have made a commitment to source our materials in a socially and environmental responsible manner. Please see https://www.ororagroup.com/about/responsible-sourcing for further information.</p>
Directly Linked	A business may be directly linked to an adverse human rights impact where it is connected to the impact through the actions of another entity with which it has a business relationship (such as a supplier).	<p>For example, consider a packaging company that may have a direct link to modern slavery when its immediate supplier produces intermediary goods using packaging materials originating from a third-party supplier engaged in modern slavery practices.</p> <p>We consider that our greatest vulnerability to modern slavery lies within our extended supply chain. We leverage our human rights due diligence framework to effectively oversee and mitigate these risks. We do this by utilising our SAQ process in the first instance, as well as third party independent assessments as required, including by conducting focused due diligence on hot spot areas of risk, such as a geographical or category supplier risk.</p>

* https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

5.5 Defining Our Risk Profile

Modern slavery has the capacity to exist within our operations and complex supply chain.

We gather and monitor both internal and external data to serve as crucial reference points, enhancing our understanding of our risk profile and facilitating our human rights risk assessments. These data points encompass:

- Assessment of external indices, such as the Global Slavery Index¹, Freedom House, Freedom in The World Index², World Bank World Wide Governance Index³, and The Fund for Peace Fragile States Index⁴.
- Evaluation of supplier expenditures.
- Examination of supplier compliance with international modern slavery legislation.
- Continuous tracking of case law, emerging legislation, and news alerts.
- Scrutiny of supplier self-assessments, including the use of our SAQ and SEDEX/EcoVadis when deemed necessary.

- Rigorous sustainability-focused due diligence on potential non-supply partners and acquisition targets, including the review of self-assessments through our SAF, SAQ, and SEDEX/EcoVadis, if required.
- Monitoring of Whistleblower cases.

While we acknowledge that supplier spend alone does not necessarily correlate with modern slavery risk, we have included it as a relevant risk analysis factor. This is due to our capacity to exert influence over and collaborate with high-spend suppliers to effectively address modern slavery risk. We remain committed to utilising a diverse array of internal and external data sources to continually refine our risk profile, which in turn informs our approach to due diligence, as elaborated in section 5.6.

Tier 2 and beyond suppliers

Given the intricate nature of our supply chain, our ability to scrutinise suppliers operating beyond the tier 1 level is not as comprehensive as it is for those in the first tier. The reason for this is because Orora has no contractual relationship with these entities, making the completion of the SAF or SAQ process, along with complying with our minimum Supplier Terms and Conditions difficult.

Recognising this gap in visibility, we acknowledge the imperative for a deeper level of due diligence concerning our tier 2 suppliers. This includes finding solutions to leverage our SAF tool and conducting further Supplier Assessment Questionnaires of our direct suppliers to augment transparency beyond our immediate tier 1 suppliers, while also working with our direct suppliers to raise

awareness of modern slavery risks within their own operations and supply chains.

Our aim is to bolster our understanding of potential risks further down the supply chain. As we persistently enhance our SAF programs, our commitment to obtaining increased transparency within this segment of the supply chain remains on track.

1 2018 Global Slavery Index, Modern Slavery: A hidden, every day problem. Available: <https://www.globalslaveryindex.org/>
2 Freedom House, Countries and Territories. Available: <https://freedomhouse.org/countries/freedom-world/scores>
3 World Wide Governance Indicators. Available: <http://info.worldbank.org/governance/wgi/>
4 Fragile States Index. Available: <https://fragilestatesindex.org/>

5.5 Defining Our Risk Profile, Continued

Potential Modern Slavery Risks

Below are examples of potential risk areas that may arise within Orora's operations and supply chain. While we acknowledge that some of these risks may exist within our own operations, we have confidence in the effectiveness of the controls outlined in this document, which mitigate the risks of modern slavery. The table below highlights areas of potential modern slavery risks pertinent to our operations and supply chains, but we remain vigilant, recognising that modern slavery risks may also manifest in other areas.

Risk Area	Key Risk Factors	Our Relationship to the Risk
Sourcing of products and raw materials used in the manufacture of our finished goods from countries deemed to be at higher risk of modern slavery	<ul style="list-style-type: none"> • Dependence on lower skilled labour • Highly complex supply chain with various interlinkages between actors. • Lack of mechanisms for addressing grievances • Connections to regions with elevated risk levels 	<p>Directly Linked / Contribute</p> <p>We recognise that every country has risks of modern slavery, with some more than others, and that we could inadvertently be directly linked or contribute to modern slavery risks within that sourcing region. As a result, we are continually working on identifying and refining the traceability of goods and services within our operations and supply chain, with an immediate focus on the countries most relevant to our business. This includes Australia, New Zealand, the United States, Mexico and Canada where we conduct our operations.</p> <p>In FY23, we also conducted a deeper due diligence on those 281 suppliers (identified in our FY22 statement) to our North American business that operated in countries with a higher prevalence of modern slavery, namely China and Mexico, where they comprised a total spend of just 2.36% of OPS's total procurement spend in that financial year. This due diligence piece revealed three potential high-risk suppliers, two in China and one in Mexico, that further due diligence work will be completed for in FY24, with the initial request of a completed SAQ and insight into their direct supply chains. Further, a total of 76 suppliers were found to have no public presence and thus, a deep dive desk top review was difficult. These suppliers will be reviewed on a priority basis in FY24 and further due diligence will be conducted, in the first instance with the request of a completed SAQ.</p>
Third-party international shipping	<ul style="list-style-type: none"> • Lack of mechanisms for addressing grievances • Worker isolation • Hazardous or substandard living and working conditions • Excessive constraints on workers' mobility 	<p>Directly Linked</p> <p>The international shipping sector presents distinctive challenges and risks, which are amplified by the geographical isolation of maritime operations and the limitations on worker mobility. Although we employ third-party international shipping providers throughout our supply chain, it's important to note that we do not directly charter vessels. As a result, we perceive limited opportunities for our direct involvement in potential modern slavery concerns in this specific area. However, to the extent that we may be able to influence and educate our direct suppliers within this supply chain, we will do so on best endeavours.</p>

Risk Area	Key Risk Factors	Our Relationship to the Risk
<p>Sourcing of goods and services used in the manufacture of our products from goods and services categories deemed to be at higher risk of modern slavery</p>	<ul style="list-style-type: none"> • Heavy use of informal/ short-term/ sub-contracting/ outsourcing employment • Extremely human-capital intensive • Elaborate and fast-paced supply chains • Lack of mechanisms for addressing grievances • Connections to regions with elevated risk levels 	<p>Directly Linked / Contribute</p> <p>We recognise that purchase of services and products within our operations remain relatively low risk, however, are cognisant that we could be directly linked or contribute to modern slavery risks within sourcing categories where low-skilled manual labour and temporary or low-paid positions exist, such as in labour hire, short-term contracts and cleaning services. In FY23, we completed our detailed review of our labour hire and cleaning services contractors using the skills and expertise of a third-party professional consulting firm. The outcome of this exercise determined that none of these suppliers were identified as carrying a high or very high risk rating that would necessitate further action. Although having completed this work, we are still actively focused on this high-risk category and will continue our due diligence and risk mitigation processes in this area.</p> <p>Further, we acknowledge that the raw materials used for the manufacturing or packaged goods required to support our customer needs can be sourced from suppliers beyond Tier 1 that may carry a higher embodied risk. Manufacturing for our Beverage business occurs in Australasia where the modern slavery risks beyond Tier 1 suppliers are lower than in other countries. Most goods purchased by our OPS business (primarily corrugated, resin, cushioning and labelling goods) are on-sold directly to our customers. OPS has a supply arrangement in place with the purchaser of our divested Fibre Business with respect to the procurement of recycled paper goods from Orora's divested Fibre Business based in Australia. We acknowledge that without adequate contractual arrangements and due diligence between our Beverage and OPS businesses with our suppliers beyond Tier 1, there is a risk of being directly linked to modern slavery through the sourcing of raw materials, packaged goods and equipment used in our operations and on-sold to our customers. Please refer to Section 5.5 – Tier 2 and beyond suppliers, for more detail on how we are addressing this risk.</p>

5.6 Due diligence – actions taken to assess and address modern slavery risks.

Our manufacturing operations have a low prevalence of modern slavery occurrence resulting from a strong regulatory environment.

However, we acknowledge that the procurement of certain goods and services, including raw materials for manufacturing, packaged goods to meet customer demands, and labour hire and facility management services, particularly from higher geographically at-risk locations such as China and Mexico, inherently carries a heightened risk of modern slavery, as indicated by the Global Slavery Index 2018.

In alignment with our steadfast commitment to safeguarding our people and upholding human rights, we have instituted a comprehensive suite of assessments and processes across our organisation to systematically identify and mitigate potential human rights and modern slavery risks.

Human resources, including diversity, equity and inclusion

Orora is committed to an inclusive workplace that embraces and promotes diversity. Our global human resources processes and policies are designed to ensure that our team members are paid fairly, in compliance with applicable labour laws, and treated fairly and with dignity, courtesy and respect.

Safety and health

The safety, health and wellbeing of our people is paramount. We continue to invest in safety to drive improved performance across the business. Please refer to our website at www.ororagroup.com and our

2023 Annual Report, which incorporates our Corporate Governance Statement, available at www.ororagroup.com/ investors for further information on our safety, health and wellbeing, culture, and diversity.

Sustainability

Our sustainability team has a number of risk mitigation and robust processes in place to ensure oversight and achievement of our redefined sustainability goals, compliance with applicable laws, reporting against our UNGC and public commitments, and alignment with our risk management framework and corporate policies.

Supplier due diligence and remediation

During the FY23 year, we proactively worked with a third-party professional consultancy to conduct due diligence on those suppliers identified as being at risk of modern slavery within their operations or supply chains. This due diligence piece included the remaining high risk labour hire and cleaning services providers identified in FY22. This more detailed supplier due diligence builds upon the work conducted previously that concerned the supplier slavery risk assessment conducted in FY22, of around 6000 suppliers to the North American OPS business in order to identify the highest risk suppliers. This year's assessment comprised of the following:

- Identification of suppliers for a detailed assessment - Orora's suppliers located in Mexico and China.
- Independent desktop due diligence conducted on the selected 281 suppliers using a methodology based on the United Nations Guiding Principles on Business and Human Rights (UNGP).
- Assessment of actual and potential human rights impacts, which suppliers may be causing, contributing to or be directly linked to through their activities, with a focus on modern slavery impacts.
- Recommendations back to the respective business units for how Orora can respond to any identified impacts or high-risk suppliers.

It's crucial to understand that the outcomes of this due diligence contributed to assessments of slavery risk and do not signify confirmed cases of identified slaves. This evaluation, in and of itself does not prove the presence of slavery or provide definitive clarity on which suppliers employ slaves and which do not. Instead, it offers an indicative risk ranking derived from publicly available and analysable due diligence factors. These rankings serve as a valuable source of information to inform our future engagement with identified suppliers.

Suppliers' Response to Actual and Potential Human Rights Risks

This dimension comprises of several key aspects of a supplier's publicly available response to actual and potential human rights risks, including:

Identification

- Outlining of actual and potential risks and impacts.
- Mapping and disclosure of supply chains of products and services.

Assessment

- Supply chain risk assessments.

Integration and leveraging of responsibility.

- Procurement procedures and/or sourcing strategies.
- Supplier policies and procedures relating to human rights.
- Commitments under sustainability or human rights frameworks, e.g., UNGC.

Actions [Mitigation/Remediation]:

- Access to grievance mechanisms and evidence of remediation.

Suppliers' Actual and Potential Human Rights Risks

This dimension is based on a range of factors contributing to a supplier's actual and potential human rights risks, such as:

- Riskiest location of operation.
- Nature of business, e.g., local or global.
- Subnational slavery vulnerability risk.

- Probable geographic origin source of products, product inputs, or services primarily provided by the supplier.
- Adverse media reports for human rights impacts.
- Any sanctions placed on an organisation.

- Visible geographic proximity of suppliers' offices or factories to populations vulnerable to human rights abuses or features of concern, e.g., proximity to country borders with known human rights risks.

Of the 281 suppliers assessed, 18 were identified to have high overall risk levels. Causes for concern ranged from minor (lack of information compounded with high subnational risk, proximity to high-risk country borders) to major (adverse media reports human rights abuses or fraud). Among the 18 high-risk suppliers, three were identified to have risk levels warranting additional detailed analysis. These resulted from potentially major areas for concern with direct engagement/action recommended to mitigate risks. In the first instance, these suppliers will be requested to complete the Orora SAQ, and pending the results from this, an EcoVadis or SEDEX assessment will be necessitated in order to continue to be able to be a responsible partner to Orora. This work will proceed into FY24. Based on the risks identified with these suppliers, the key focus of this exercise will be to seek further transparency into the deeper tiers of our supply chains, as the majority of our exposure likely sits at tiers 2 and 3 to the source.

78 suppliers lacked any real publicly available information (e.g., annual reports, policies, sustainability reports, or any other disclosures) causing us to rely more on the assessment of the consultant regarding their actual and potential human rights risks. This paucity of disclosure is largely because these suppliers are a) small in size (M/SMEs), and/or b) family or privately owned (not required to disclose). Generally, the lack of transparency was not alarming given each supplier's context, but it does mean certain risks within our supply chain could remain obfuscated. In FY24, a review of these 78 suppliers will be conducted and a prioritisation matrix developed to understand which of these suppliers will require further due diligence, with the same action as our high-risk suppliers being ensued, by requesting the completion of the SAQ in the first instance.

Utilising the same principles as above on the remaining labour hire and cleaning services providers, the findings of the assessment put them at a risk ranking within the tolerable range to continue to do business with Orora, therefore, these suppliers will not be progressed

further. However, as this is a high-risk supply category, we will continue our due diligence in this space, with periodic re-assessments.

With the effective integration of the SAF program into SAP Ariba within the ANZ business, during this period we successfully onboarded and screened 61 new suppliers to the business. The three step SAF process, as illustrated, goes beyond the modern slavery requirements defined in the Australian Commonwealth Modern Slavery Act and Californian Transparency in Supply Chains Act, by identifying, assessing and managing potential human rights, labour, environment and corruption issues inline with our commitments to the UNGC and risk management framework.

Based on the algorithm that determines a risk rating concerning the number of potential human rights, labour, environmental, and governance risks, only 2 of these suppliers were required to complete our SAQ. These suppliers were proactive in their response and based on their resulting score from the SAQ and robustness of supporting evidentiary information, their risk profile was downgraded, and they were successfully onboarded.

In the event of an unsatisfactory SAQ or proceeding SEDEX assessment, as part of our due diligence framework, we will ask suppliers to undertake an ethical SEDEX Ethical Trade Audit. Suppliers who receive a high-risk rating following this audit will be required to partner with Orora to mitigate any identified risks through an agreed mitigation plan. Suppliers unwilling to participate in this process or who demonstrate reluctance to improve their practices to appropriately mitigate any identified human rights, labour, environmental and governance risks may be removed as suppliers to our business. As yet, we have not identified any suppliers that have required this level of action.

Furthermore, we continuously conduct sustainability focused due diligence on potential non-supply partners and acquisition targets, including reviewing self-assessments through our SAF, and SAQ and SEDEX/EcoVadis, as necessary.

SAF process

1

MAP

Supplier Questionnaire

- Supplier type
- Industry type
- Supplier size
- Supplier spend
- Country of manufacture/service provision
- Supplier requirement to comply with international modern slavery legislation

2

PRIORITISE

Inherent Risk Assessment

- High Risk → Supplier Assessment Questionnaire
- Medium and low risk → monitor

3

MITIGATE

High risk

- Sedex/EcoVadis assessment
- Risk assessment/Remedy
 - Regular review
- Medium and low risk → Monitor

5.7 Raising awareness, training and capability building

During the year, bespoke training and awareness material was developed for Orora team members globally to further the awareness and plight of modern slavery and other human rights abuses. Awareness material was shared on e-screens across the global business, as well as discussed during business town halls. This was developed and delivered in both English and Spanish. Further, more detailed training was developed for our e-learning platform to be realised in FY24 to all staff required to complete Orora training modules via the dedicated e-learning program. This training pack included a video message from our Chief People, Sustainability and Governance Officer, highlighting the importance of mitigating modern slavery risks as well informing the business of our Human Rights Due Diligence Framework. This was also developed in both English and Spanish.

Capacity Building

In FY2023, we continued our partnership with a third-party professional consultancy firm to collaboratively craft a human rights risk methodology for our geographical and category at risk suppliers. These services are designed to enhance Orora's comprehension and capacity building of potential human rights risks within our supply chain. These services have helped to play a pivotal role in reinforcing our Human Rights Due Diligence Framework and contribute to our extended collaboration efforts with high-risk suppliers.

5.8 Grievance and Remediation

Orora is deeply committed to ensuring that if, by any chance, we are found to have caused, contributed to, or been connected in any manner to incidents of modern slavery, we are resolute in our dedication to implementing a comprehensive remediation plan.

It is important to note that, up to this point, we have neither uncovered nor been made aware of any such instances within our operations or supply chains.

Looking ahead, in the event that such instances come to light, our approach will be to initiate a dialogue with the party responsible, with the intent of collaboratively understanding and addressing the underlying issues. We recognise our capacity to influence our suppliers, with the extent of this influence contingent on factors such as supplier size, location and the nature and duration of our engagement with them.

Our grievance processes

Our Code places a significant emphasis on fostering a culture of integrity and ethical conduct. This ethos is closely aligned with our independent Anti-Bribery and Anti-Corruption policies, as well as our Whistleblower policy. These policies set forth clear expectations covering a wide spectrum of issues, including environmental management, safety and health, and human rights.

Our Code applies to all team members and third parties, such as suppliers and contractors. They are encouraged to report any reasonably suspected misconduct, improper situations, or circumstances within the Company. These reports may pertain to unethical or illegal behaviour, coercion, harassment or discrimination, fraud or corrupt practices, as well as workplace safety and environmental hazards. Reporting can be done through designated recipients outlined in our

Whistleblower policy that is readily available online (www.ororagroup.com/investors/corporate-ethics), including the option for anonymous reporting via an independent third-party integrity reporting service (www.ororagroup.deloitte.com.au).

Our grievance and reporting procedures are designed to ensure safe and transparent processes for the investigation and response to claims and concerns. These procedures operate in an ethical, confidential, and transparent manner. All claims, concerns, and investigation outcomes are reported to the relevant Board sub-committee, which subsequently provides recommendations to the Board.

Assessing the effectiveness of our actions

We assess the effectiveness of our actions against our human rights due diligence framework, for reducing modern slavery risks and driving changes to behaviours, systems and processes across our operations and supply chains:

Component of our HRDD Framework	How we assess effectiveness	Key Outcomes
Identify & Assess	<ul style="list-style-type: none"> Risk Identification and emergence Compliance against our code. 	<ul style="list-style-type: none"> We persistently monitor our modern slavery risk profile to ensure that our framework is fit for purpose, including the emergence of new risks. We identified and assessed 281 Suppliers to our North American OPS business from China and Mexico resulting in 3 potential high-risk suppliers. Further due diligence to be ensued in FY24. There is ongoing communication between Orora and its suppliers on Orora's Supplier Code of Conduct and Ethics Policy and compliance with key modern slavery contractual requirements, including discussions on any issues identified, and how to address them.
Manage & Mitigate	<ul style="list-style-type: none"> Mitigation Policies Supplier Assurance 	<ul style="list-style-type: none"> Human Rights Due Diligence Framework and associated mitigation processes reviewed and updated to ensure their relevance and effectiveness, leading to the development of an internal framework, documented procedure, and the commencement of a Human Rights Policy. A total of 61 suppliers to the Australasian business were on-boarded and evaluated through the SAF in FY23, and 2 suppliers proceeded through to the SAQ.
Remediate & Collaborate	<ul style="list-style-type: none"> Remediation Grievance Mechanism Training Collaboration 	<ul style="list-style-type: none"> Remediation processes were not required during this period. Number of grievances reported to our third party in relation to modern slavery were zero. Training and awareness material for the entire global organisation was developed, with content shared at town halls and on e-screens for all team members. Further online training through our dedicated training platform will be released in FY24 for all salaried staff across the global business. Cross-collaboration, which extends beyond a specific time-frame, is an ongoing and iterative process characterised by numerous meetings held between corporate and the ANZ and OPS divisions. This collaborative approach is dedicated to promoting knowledge sharing, aligning actions, improving decision-making processes, and ensuring the effective achievement of our objectives across the entire organisation.
Report, Escalate & Assurance	<ul style="list-style-type: none"> Communication Evaluation Assurance 	<ul style="list-style-type: none"> Orora's Board, via its Safety, Sustainability & Environment, Human Resources and Audit, Risk & Compliance Committees, along with the Executive Leadership team, receive routine updates [at least quarterly] on these actions and our progress. Management also reports on governance, market trends, and network changes that may impact our human rights management in our operations and our supply chains. The Working Group continues to meet on an on-going basis, evaluating the mitigation tools and processes in-situ and continually reviewing the effectiveness of our actions.

Next Steps...

Focus for FY24

Engage with residual high-risk suppliers (China & Mexico)	<p>Complete our review of Mexican and Chinese suppliers to our North American businesses and determine ongoing engagement or mitigation with suppliers who are assessed as high risk following our SAQ assessment and SEDEX/ EcoVadis assessment as necessary, or do not co-operate with us to undertake this process.</p>
Engage with priority suppliers identified with no public presence (China & Mexico)	<p>Prioritise the 78 suppliers that were unable to be risk assessed and commence our review of key suppliers located in Mexico and China to our North American OPS business, without a public presence and therefore could not be risk assessed effectively via the third-party desk top audit. Request any suppliers determined as high risk to complete the Orora SAQ process and pending results to undertake an EcoVadis / Sedex assessment.</p>
Optimise Supplier Assurance Framework (SAF) – ANZ	<p>Now that the SAF has been successfully executed as an automated on-boarding requirement for all new suppliers to our Australasian business, we will conduct a thorough review of the criteria and thresholds used and continue to optimise the process. An internal audit which will be conducted by Orora's Audit and Risk team will also test the integrity of the system. Upon completion of both these processes, this system will be used to begin screening all incumbent suppliers, initially on a determined priority basis (for example, based on volume of transactions with those suppliers and spend). These are the suppliers that Orora may be able to best influence and collaborate with on these issues as part of our strategic partnerships.</p>
Developing our Supplier Assurance Framework (SAF) – North America (NA)	<p>Continue the risk profile review of our North American businesses, to enable us to gain a better insight into any instances or risks of modern slavery within those operations or their complex supply chains and determine the most effective way to fully implement the SAF into our North American procurement practices.</p>
Complete Global Training	<p>Complete the mandatory general awareness modern slavery training for all salaried team members, in addition to delivering the Group human rights and modern slavery awareness campaigns.</p>
Develop specific training material for the Board and Executive Leadership Team	<p>We will develop specific modern slavery training material for our senior executives and board representatives to build the internal capacity of our senior leadership team and to further raise and spread awareness of the key risks within our organisation and supply chains.</p>
Complete Human Rights Due Diligence Procedure	<p>This internal procedure would apply to Orora Limited (Orora) in its domestic and global operations and supply chains. It will describe processes and responsibilities relevant to the Human Rights Due Diligence Framework and ensures compliance with the Australian Modern Slavery Act 2018 (Act). The overarching objective of this procedure is to document critical processes and responsibilities to ensure that modern slavery risks are identified and addressed within Orora's operations and its supply chains, consistent with the requirements of the Act.</p>
Implement an Orora Human Rights Policy	<p>Through the continual development and refinement of our human rights framework and the development of our internal Human Rights Due Diligence procedure, it was identified that a Human Rights Policy would benefit Orora for several reasons beyond serving as a guiding compass for ethical conduct and responsible business practices. This policy would be a continuous improvement tool by providing a framework for ongoing assessment, monitoring, and improvement of Orora's human rights practices, ensuring that the company evolves and adapts to changing circumstances and expectations. It will also be the core document that underpins our framework.</p>

Appendix 1 – Addressing the Modern Slavery Act’s Mandatory Reporting Criteria

The table below sets out how this Statement addresses the mandatory reporting criteria under the Modern Slavery Act. 2018.

Mandatory reporting requirements	Reference in this Statement
Identify the reporting entity:	Section 1 Appendix 2
Describe the reporting entity’s structure, operations, and supply chains:	Section 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls:	Section 3 Section 5
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes.	Section 3 Section 5
Describe how the reporting entity assesses the effectiveness of these actions	Section 6
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).	Section 5.3 Appendix 2

Appendix 2 – Joint Statement and Consultation

We have prepared this statement on a consolidated basis for Orora together with its subsidiaries (Orora Group) – although not all of the entities in the Orora Group are subject to the Act.

Orora Limited (ABN 55 004 275 165) qualifies as a reporting entity under the Australian Commonwealth Modern Slavery Act. Orora Packaging Australia Pty Ltd (a wholly owned subsidiary of Orora Limited), also meets the reporting test set out in the Australian Commonwealth Modern Slavery Act.

Orora Limited, together with Orora Packaging Australia Pty Ltd comprise the Reporting Entities. This statement is a joint statement and responds to the Commonwealth Modern Slavery Act requirements.

Whilst our business operations differ in Australasia and North America, our corporate governance and risk management framework applies across the Orora Group and is approved by the Orora Board. This statement should be read in conjunction with Orora’s other

periodic and continuous disclosure announcements lodged with the ASX, including our FY23 Annual Report and Corporate Governance Statement, which are available at <https://www.ororagroup.com/investors>.

Consultation

This statement has been prepared with input from, and in consultation with, the Reporting Entities, Orora’s Executive Leadership team (who have responsibility for the operation of the Orora Group), Orora’s cross-functional Modern Slavery Working Group and cross-functional management representatives across the Orora Group, including from the finance, procurement, risk, sustainability, human resources, legal and company secretariat teams. This statement was approved by the Orora Limited Board and the Board of Orora Packaging Australia Pty Ltd, who have authorised Brian Lowe, Managing Director & CEO of Orora Limited to sign this statement on its behalf.

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