

Orora Modern Slavery Statement FY22

Our Commitment to Human Rights



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Introduction

Orora Limited (Orora) is pleased to submit its Modern Slavery Statement for the financial year ended 30 June 2022 (FY22), 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 both or either of the Act or Californian Transparency in Supply Chains Act, which are applicable to the Orora Group.

This joint statement should be read in conjunction with Orora's other periodic and continuous disclosure announcements lodged with the ASX, including our FY22 Annual Report, incorporating our Corporate Governance Statement, which is available at www.ororagroup.com/investors and provides:

- Background information on our operations and supply chains
- A summary of our strategic approach to sustainability and the governance arrangements we have in place to continually assess and improve our approach to addressing modern slavery risks
- A summary of the main modern slavery risks that we currently face
- Information on the actions being taken to mitigate those risks and how the effectiveness of these mitigating actions is assessed
- Any other information as required by relevant legislation.

Each year, our statements will build upon the depth of our previous modern slavery work. Appendix 1 to this statement provides a summary of our progress made against our FY22 priorities included in our FY21 statement, and notes where in this statement our progress is referred.

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.

Figure 1



About Us

We are a public company listed on the Australian Securities Exchange (ASX:ORA) and are 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, we launched "One Orora", which reset our shared definition and understanding of what it means to be Orora today. We recognise what unites us across the Orora Group – our promise, our purpose and our drive to deliver on our strategy – guided by our principles and always underpinned by our values. Figure 1 depicts our One Orora approach.

Our principal businesses are located in Australia, New Zealand and North America, but we work closely with our customers around the world to provide an extensive range of tailored packaging and visual communications solutions. These include the manufacture, design and supply of packaging products such as glass bottles, beverage cans, corrugated boxes, recycled paper, point of purchase displays and health, safety and facilities supplies. We also offer broad end-to-end packaging solutions and complementary services, including global product sourcing, distribution, design, printing and warehouse optimisation. Every day, millions of consumers buy and use goods in packaging proudly designed, developed, manufactured or supplied by Orora. Figure 2 depicts our operations at a glance as at 30 June 2022.

Figure 2

Orora at a glance

An ASX-listed public company headquartered in Melbourne, Australia with over A\$4 billion in sales in FY22, Orora's purpose is to be a leading sustainable packaging solutions provider, designing and delivering products and services that enable our customers' brands to thrive.

Our portfolio

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

Beverage Australasia

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.

OPS North America

Orora Packaging Solutions (OPS) leads the US market in custom packaging design and solutions, and supply chain optimisation. From corrugate manufacturing to equipment and automation, we create sustainable packaging solutions to serve a range of sectors including food and beverage, industrial, warehouse and shipping, healthcare and beauty, technology and automotive, offering complementary services in global product sourcing, testing, printing and distribution.

Orora Visual North America

Orora Visual delivers cutting-edge visual and product marketing solutions including Point-of-Purchase (PoP) displays, promotional signage, retail-ready and consumer packaging, and labels and tags for packaging, horticulture and retail customers across segments such as food, beauty, home and apparel, hospitality and entertainment. We provide design and creative services, print, finishing, fulfilment and distribution plus a range of value-add services.

4.8k

Team members

\$4,090.8m

Group Sales revenue

41k

Shareholders

\$285.5m

Group EBIT

22

Manufacturing plants

77

Distribution sites

Our operations and supply chains

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.

Our principal business groups, operations and supply chains during FY22 are set out in Figure 2 and Appendix 3.

Our approach and commitment

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

Sustainability is core to Orora's approach in achieving our strategic goals, reducing our impact on society and the environment, and maintaining the respect and support of our people and the communities in which we operate now and in the future.

Our sustainability efforts as depicted in Figure 3 below are guided by our three pillar sustainability strategy of Circular Economy, Climate Change and Community which is "our promise to the future" and aligns to the expectation of our key stakeholders and our obligations as a signatory to the United Nations Global Compact (UNGC). We monitor, manage and report progress on a range of indicators used to assess the effectiveness of our responsible business programs and performance. We report our progress against these metrics in our Annual Report (which incorporates our Corporate Governance Statement), which should be read in conjunction with this statement.

Protection of our people and human rights is core to our sustainability Community pillar. We oppose all forms of slavery in our operations and the operations of our suppliers. We are committed to identifying, assessing and mitigating human rights

impacts, providing access to remedy through effective grievance/complaint mechanisms and ensuring continuous improvement to strengthen our actions. Although we have not yet found instances of modern slavery in our operations or supply chains, this statement details how and where we will continue to look for it, to provide us with the opportunity to:

- understand, refine and improve our processes for identifying and managing modern slavery and broader human rights risks
- work across the Orora Group to promote human rights and identify opportunities to collaborate to enhance our management of human rights risks
- seek to anticipate the evolving nature of human rights and Orora's responsibility to respect human rights, including in times of uncertainty and challenge.

Further information on our approach to sustainability can be found in www.ororagroup.com/investors and on our website at www.ororagroup.com/sustainability.

Figure 3

Our Promise to the Future



Circular Economy

- Recycled content
- Recyclable packaging
- Recyclable substrates
- Certification



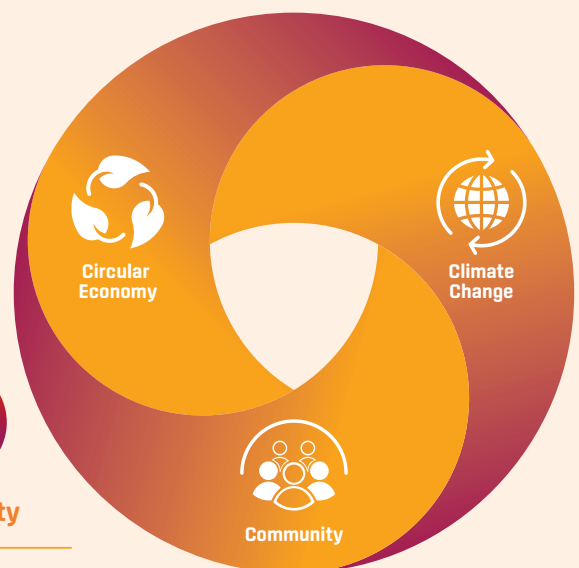
Climate Change

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



Community

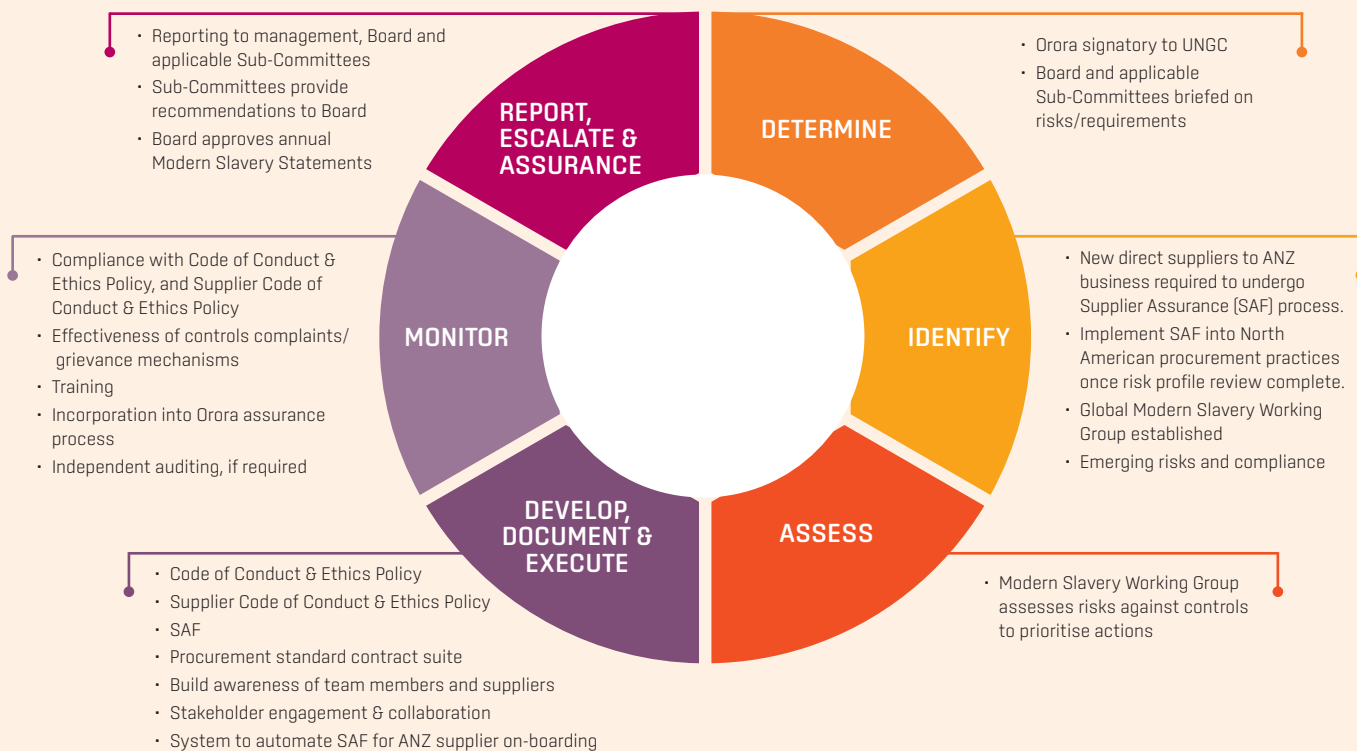
- Safety & health
- Diversity, equity & inclusion
- Human rights and supply chain
- Responsible sourcing



Governance of modern slavery at Orora

Our governance of modern slavery at Orora depicted in Figure 4 and described below aligns with Orora’s enterprise risk management framework.

Figure 4



Our enterprise risk management and modern slavery governance framework

We have an enterprise risk management framework, the management of which is a priority for senior management, and sponsored by the Orora Board.

Our integrated risk management framework incorporates the principles of effective risk management, as set out in the Global Risk Management Standard ISO3100, to meet our objectives, relevantly including:

- enhancing shareholder value through improved share price and earnings growth in the short to medium term whilst building a sustainable business for the longer term
- improving stakeholder confidence and trust
- safeguarding the company’s assets - human, property, reputation, knowledge
- enabling the Board to fulfil its governance and compliance requirements.

The Orora Board and Executive Leadership team have responsibility for driving and supporting risk management across the business. Orora’s assurance function, which includes the Internal Audit function, plays a key role in reviewing the effectiveness of our compliance and control systems, including risk management. Findings from these reviews are communicated to the Audit, Risk and Compliance Committee of the Board, and appropriate actions taken to support our strong control environment.

Our cross-functional Modern Slavery Working Group:

- is responsible for identifying and implementing process improvements to minimise the risk of modern slavery in Orora’s business operations and supply chain, and to ensure compliance with applicable laws and standards
- reports and provides recommendations to the Safety, Sustainability & Environment and Audit, Risk & Compliance Committees of the Board, who provide recommendations to the Board.

The Board ultimately oversees health, safety and modern slavery risks and ensures timely disclosures and corporate reporting in accordance with applicable laws and our risk management framework.

Policies and governance documents

We also have a strong foundation of governance documents, which outline the requirements of our team members and suppliers. We are committed to continually improving our policies and procedures to reduce the risk of modern slavery at our operations and in our supply chains. We will continue to test the effectiveness of our approach, enhance our actions and responses as we work to help drive meaningful change for people most affected by modern slavery.

Every team member of our workforce who works at or supports our operations globally is guided by Our Code of Conduct and Ethics Policy (Code) and other applicable policies and procedures.

We are focused on how we can engage with and encourage our suppliers and service providers to maintain business practices and workplace standards that are comparable to our own.

Our Code sets the standard for our commitment to working with our values, including integrity and respect, sets out standards of behaviour for our people, and outlines the human rights commitments applicable to our people, as well as our contractors and suppliers. Our Code emphasises a strong culture of integrity and ethical conduct in association with our independent Anti-Bribery and Anti-Corruption and Whistleblower policies. These policies cover expectations on a broad range of issues, including environmental management, safety and health, and human rights.

Team members and other third parties (including suppliers and contractors) can report reasonably suspected misconduct or an improper state of affairs or circumstances within the Company, including unethical/ illegal behaviour, coercion, harassment or discrimination, fraud or corrupt practices, or workplace safety or environmental hazards through eligible recipients noted in our Whistleblower policy, including anonymously through an independent third party integrity reporting service.

Our grievance/complaints and reporting procedures all include safe and transparent processes for investigating and responding to claims and concerns in an ethical, confidential and transparent way. All claims and concerns and investigation outcomes are reported to applicable Board sub-committee, which make recommendations to the Board.

Requirements for suppliers

Our global Supplier Code of Conduct and Ethics Policy (Supplier Code) complements our Code and sets minimum standards for our suppliers and their supply chain in line with our Code, values and commitment to the Ten Principles of the UNGC. Our Supplier Code is supported by our Supplier Assurance Framework (SAF) – an important due diligence and risk mitigation tool discussed in the “Due diligence - actions taken to assess and address modern slavery risk” section below.

Compliance with the Supplier Code is necessary for doing business with Orora and is included in our procurement standard contract suite and purchase order terms and conditions.

Identifying modern slavery risks

Modern slavery has the potential to exist in our operations and complex supply chain through a variety of circumstances.

Local suppliers

We recognise that modern slavery risks exist in local supply chains across all our operations. These risks generally relate to a lack of awareness and acceptance of modern slavery risks, particularly in small to medium-sized enterprises that are still developing their management capability and understanding of labour standards.

Indirect supply chains

Many modern slavery risks lie deep within supply chains. We recognise there are limitations in our ability to influence our broader supply chain, but continue to engage with our direct suppliers to raise their awareness of modern slavery risks within their own organisations and supply chains. As a minimum requirement to partner with Orora, direct suppliers are expected to affirm they will comply with our Supplier Code of Conduct and Ethics Policy to mitigate against risks of modern slavery. All new suppliers to Orora's Australasian business are also required to undergo our SAF program before engagement, which is in the process of being automated.

Defining our risk profile

We collect and monitor internal and external information for use as data points to inform and improve the definition of our risk profile, and support our human rights risk assessments. These data points include:

- reviewing 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)
- supplier spend
- supplier requirement to comply with international modern slavery legislation
- tracking case law, emerging legislation and news alerts
- reviewing supplier self-assessments, including through our SAQ and SEDEX/ EcoVadis, if necessary
- conducting sustainability focused due diligence on potential non-supply partners and acquisition targets, including reviewing self-assessments through our SAF, and SAQ and SEDEX/EcoVadis, if necessary
- Whistleblower cases.

While we recognise that spend does not necessarily correlate with modern slavery risk, we have included it as a relevant risk analytic because of our ability to influence and partner with our high-spend suppliers to address modern slavery risk.

We will continue to use a range of internal and external data sources to continually improve the definition of our risk profile, which informs our due diligence approach discussed in the "Due diligence – actions taken to assess and address modern slavery risk" section below.

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/>

Our current risk profile

In FY22, we reviewed our risk profile and undertook an initial risk profile review of suppliers to our North American OPS business, the results of which are noted below.

Profile	Descriptor of risk
Country risks	<p>We recognise every country has risks of modern slavery. We are working on identifying and refining the traceability of goods and services within our operations and supply chain, with a focus on the countries most relevant to our business. This includes Australia, New Zealand, the United States, Mexico, Canada and UK/Scotland where we conduct our operations. We procure a significant portion of our goods and services to our Australasian operations from within Australasia, but also procure some goods sourced from Asia and Mexico, primarily to our North American operations. In FY22, some direct suppliers to our OPS North American business operated in countries with a higher prevalence of modern slavery according to the Global Slavery Index [20181]. The highest prevalence of modern slavery based on the Global Slavery Index [20181] are Mexico and China. Across these two countries, the total number of suppliers was 281 [241 in Mexico and 40 in China], which together comprised 2.36% of OPS's total FY22 procurement spend. The majority of OPS's suppliers are located in the United States [5436 out of a total 6028 suppliers] which account for approximately 94% total OPS procurement spend for FY22. We do not source goods from or sell products to Russia or Russian entities.</p>
Goods and services profile risks	<p>Our higher risk goods categories are:</p> <ul style="list-style-type: none"> Raw materials and packaged goods – raw materials used for manufacturing or packaged goods to support customer needs can also be sourced from suppliers beyond Tier 1 in higher risk countries. 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 within our Beverage and OPS businesses there is a risk of being directly linked beyond out Tier 1 suppliers to modern slavery through the sourcing of raw materials, packaged goods and equipment used in our operations and on-sold to our customers. PPE and other safety supplies – the demand for PPE and medical supplies manufactured in Asia (particularly with rapid sourcing required during the COVID-19 pandemic) heightened the risks of modern slavery on vulnerable workers. <p>Our higher risk service categories are:</p> <ul style="list-style-type: none"> Labour hire and short term contract workers – temporary work tends to carry a higher risk of modern slavery due to its transitory nature, a higher rate of migrant workers and strong competition causing pressure to minimise costs. These factors can incentivise the use of modern slavery practices. We acknowledge that without adequate contractual arrangements and due diligence there is a risk that we could contribute or be directly linked to modern slavery practices through the hiring of short-term contract workers via recruitment agencies. Facilities management (including cleaning) – carries a higher risk of modern slavery, including in Australasia, due to low-skilled, low-paid, manual work and the high prevalence of short-term, seasonal and migrant workers and subcontractors. Without adequate contractual arrangements and due diligence there is a risk that we could contribute or be directly linked to modern slavery practices through our arrangements with suppliers in the cleaning and facilities management sectors. This includes the provision of cleaning services at our sites and in the office spaces we lease.

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

All of our manufacturing operations based in Australia, New Zealand and North America have a low prevalence of modern slavery country occurrence [Global Slavery Index 2018¹] and a strong regulatory environment

As noted above in our current risk profile, we recognise that procurement of some goods and services (including raw materials used for manufacturing or packaged goods to support customer needs, and labour hire and management facility services) outside of Australian, NZ and NA, including from China and Mexico, carries inherently higher modern slavery risk [Global Slavery Index 2018¹].

To uphold our commitment to protect our people and human rights, we have a range of assessments and other processes across our business to identify and mitigate 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.

Orora has continued to be recognised as an essential service provider during the COVID-19 pandemic across Australasia and North America. During FY22, we continued to implement and maintain a range of measures in response to the global pandemic, to mitigate the risk of transmission into and at Orora's sites.

Please refer to our website at www.ororagroup.com and our 2022 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

To further Orora's commitment to the UNGC, we are a SEDEX member (one of the world's leading ethical trade membership organisations, working with businesses to identify human rights and other risks in order to improve working conditions in global supply chains) and have implemented a SAF, initially into our Australasian procurement framework, aligned to our risk profile, to identify and mitigate potential human rights, labour, environmental, and governance risks within our supplier base.

Our SAF process depicted below in Figure 5, 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 in line with our commitments to the UNGC and risk management framework.

Assessing human rights risks as a standard automated procurement component of on-boarding a new supplier, initially in Australasia, is almost complete.

Figure 5



Suppliers assessed as high risk based on our internal risk assessment criteria are requested to join SEDEX or EcoVadis, link with Orora and complete a further risk assessment based on the SEDEX/EcoVadis self-assessment questionnaire, and undertake an ethical SEDEX Ethical Trade Audit, if applicable and as required. Suppliers who receive a high risk rating following a SEDEX/EcoVadis assessment are assessed and required to partner with Orora to mitigate any identified risks through an agreed mitigation plan. Suppliers unwilling to participate in this process or 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.

In FY21, our SAQ was distributed to eleven Tier 1 labour hire and cleaning service suppliers to our Australasian or North American businesses who were assessed as high risk following our initial SAF assessment.

Two suppliers to our Australasian business have completed our SAQ, and as a result of their combined SAF and SAQ assessments, they have been determined as high risk. These suppliers are still in the process of completing their SEDEX assessment.

During FY22, three suppliers to our North American businesses completed and returned their SAQ. As a result of their combined SAF and SAQ assessments, two have been determined as high risk, and one medium risk. The two high risk suppliers will now commence their EcoVadis assessment.

The remaining six suppliers are yet to return their SAQ responses. We are still attempting to engage with these suppliers to complete our process. Failing which, a decision will be made about their continued engagement with Orora. The ability to engage with these suppliers has been further exacerbated due to the Covid pandemic.

As noted above in the "Identifying Modern Slavery Risks" section, we 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, if necessary.

During the reporting period, we entered into a long term agreement with Epic Energy to purchase renewable electricity to help meet the expected energy requirements of our Gawler glass manufacturing facility in South Australia, along with the Large Scale Renewable Generation Certificates, from Epic's Mannum Solar Farm, which will commence operation in late 2023. Epic Energy and its relevant supply chain were required to satisfactorily meet our SAF requirements before the long term agreement was signed, given solar panels are at risk of links to state-sponsored forced labour in China.

In FY23 and beyond, we will continue to undertake a risk-based phased approach to continually assess existing suppliers based on our risk profile, commencing with the assessment of suppliers located in Mexico and China to our OPS business in FY23.

Raising awareness, training and capability building

Across our business we raise awareness, conduct training and build capability so that our teams are aware of our policies and standards, can identify and assess risks, and are equipped to respond appropriately.

We have conducted several awareness and information sessions for senior managers, Orora's Australasian procurement team and select members of the North American management teams of Orora Packaging Solutions and Orora Visual on our commitment to protecting human rights, including as a signatory to the UNGC and Orora's SAF.

In FY22, additional focused mandatory modern slavery training was undertaken by all members of our human resources team throughout Australasia and North America also undertook further focused mandatory modern slavery training, including in respect of our SAF.

Assessing our actions and outcomes

There are currently no fundamental units of measurement or international standards for measuring human rights impacts. This is a complex issue that presents a challenge for all companies in terms of providing credible measurements as to their effectiveness in addressing modern slavery risks.

The following is in place to assess the effectiveness of the above actions:

1. The Board, via the Safety, Sustainability & Environment, and Audit, Risk & Compliance Committees, receives regular updates on the above actions and how Orora is progressing, together with management updates on governance, market trends and network updates that may impact the way we manage human rights issues in our operations and supply chain. Suggestions for improvement of our SAF have been progressively incorporated, including in FY21.
2. The Managing Director & CEO and Executive Leadership Team are regularly updated on the progress of the above.
3. Orora undertakes a risk-based phased approach to continually assess its suppliers. In FY23 our updated SAF will be reinstated as an on-boarding requirement for all new suppliers to our Australasian business. Our updated SAF will be implemented into our North American procurement practices following further review and determination of the most effective means of implementation.
4. There is ongoing communication between Orora and its suppliers on the 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. Independent audits will be undertaken, if required.
5. Orora's sustainability performance is reported in the company's Annual Report, incorporating its Corporate Governance Statement, which is available on Orora's website and lodged with the ASX. Orora's website also contains updates on our sustainability activities.
6. The Board, via the Audit, Risk & Compliance, and Human Resources Committees, regularly oversees and monitors incident and whistleblower reports to identify whether any complaints/grievances relating to modern slavery have been reported, and what actions have been taken to address any substantiated claims.

Looking ahead

Over the 2023 financial year, our key focus areas will be to:

- Complete our review of existing labour hire and cleaning service providers suppliers 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
- Commence our review of suppliers located in Mexico and China to our OPS North American business, and request any suppliers determined as high risk go through our improved SAF and SAQ process to undertake an EcoVadis assessment
- Complete our SAF as an automated on-boarding requirement for all new suppliers to our Australasian business
- 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 our SAF into our North American procurement practices
- Implement further mandatory general awareness modern slavery training for all global employees, in addition to Group human rights and modern slavery awareness campaigns.

Approvals

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 2022.



BRIAN LOWE
Managing Director & CEO

Appendix 1 – Progress against our FY22 priorities

FY22 priority	Progress	Statement reference
<p>Complete our review of existing labour hire and cleaning service providers suppliers to our Australasian and North American businesses, and request any suppliers determined as high risk through our improved SAF to undertake a SEDEX/ EcoVadis assessment</p>	<p>In FY21, our SAQ was distributed to eleven Tier 1 labour hire and cleaning service suppliers to our Australasian or North American businesses who were assessed as high risk following our initial SAF assessment.</p> <p>Two suppliers to our Australasian business have completed our SAQ, and as a result of their combined SAF and SAQ assessments, they have been determined as high risk. These suppliers are still in the process of completing their SEDEX assessment.</p> <p>During FY22, three suppliers to our North American businesses completed and returned their SAQ. As a result of their combined SAF and SAQ assessments, two have been determined as high risk, and one medium risk. The two high risk suppliers will now commence their EcoVadis assessment.</p> <p>The remaining six suppliers are yet to return their SAQ responses. We are still attempting to engage with these suppliers to complete our process. Failing which, a decision will be made about their continued engagement with Orora.</p>	<p>Page 12</p>
<p>Reinstate our SAF as an on-boarding requirement for all new suppliers to the Australasian business, following system upgrades and the review and improvements made to our SAF during FY21</p>	<p>Assessing human rights risks as a standard automated procurement component of on-boarding a new supplier, initially in Australasia, is almost complete.</p>	<p>Page 11</p>
<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 our SAF into our North American procurement practices</p>	<p>In FY22, we undertook an initial risk profile review of suppliers to our North American OPS business, which determined that some direct suppliers to our OPS North American business operated in countries with a higher prevalence of modern slavery according to the Global Slavery Index (2018). The highest prevalence of modern slavery based on the Global Slavery Index (2018) are Mexico and China. Across these two countries, the total number of suppliers was 281 (241 in Mexico and 40 in China), which together comprised 2.36% of OPS's total FY22 procurement spend. The majority of OPS's suppliers are located in the United States (5436 out of a total 6028 suppliers) which account for approximately 94% total OPS procurement spend for FY22. A further, more detailed, risk review of the suppliers from Mexico and China that serve our North American operations will continue into FY23 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.</p>	<p>Page 10</p>
<p>Implement further mandatory modern slavery training for employees in our human resources teams in Australasia and North America, in addition to Group human rights and modern slavery awareness campaigns.</p>	<p>In FY22, additional mandatory modern slavery training was undertaken by our human resources teams in Australasia and North America.</p>	<p>Page 12</p>

Appendix 2 – Joint Statement and Consultation

We have prepared this statement on a consolidated basis for the Orora Group (Orora Limited together with its subsidiaries) – although not all of the entities in the Orora Group are subject to both or either of the Australian Commonwealth Modern Slavery Act or Californian Transparency in Supply Chains 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 FY22 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.

Appendix 3 – Orora’s principal business groups, operations and supply chains during FY22

Business group	Operations	Operations location[s]	Direct Supply Chain Categories
Beverage	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.	Australia and New Zealand	<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)
Orora Packaging Solutions	Orora Packaging Solutions (OPS) leads the US market in custom packaging design and solutions, and supply chain optimisation. From corrugate manufacturing to equipment and automation, we create sustainable packaging solutions to serve a range of sectors including food and beverage, industrial, warehouse and shipping, healthcare and beauty, technology and automotive, offering complementary services in global product sourcing, testing, printing and distribution.	United States of America, Mexico, Canada and UK/ Scotland	<ul style="list-style-type: none"> Raw materials (paper, inks, adhesives, other chemical products supporting corrugated manufacturing) 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)
Orora Visual	Orora Visual delivers cutting-edge visual and product marketing solutions including Point-of Purchase (PoP) displays, promotional signage, retail-ready and consumer packaging, and labels and tags for packaging, horticulture and retail customers across segments such as food, beauty, home and apparel, hospitality and entertainment. We provide design and creative services, print, finishing, fulfilment and distribution plus a range of value-add services.	United States of America	<ul style="list-style-type: none"> Raw materials (paper, plastic sheets, specialty or name brand print media, corrugate mounting sheets, adhesives, inks, other chemical products supporting print 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)

