

# Orora Modern Slavery Statement 2025



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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 in Australia. 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 their Elders, both past and present, as well as those who are emerging, to carry forward the wisdom and heritage of these ancient cultures.

# About this Statement

This Modern Slavery Statement has been prepared in accordance with the *Modern Slavery Act 2018* (Cth) (the **Act**) and outlines the actions taken by Orora Limited (ABN 55 004 275 165) (ASX:ORA) (the reporting entity) and its subsidiaries (**Orora Group**) to assess and address modern slavery risks in Orora Group's operations and supply chains during the financial year ending 30 June 2025 (**FY25**). It also outlines our forward-looking commitments to strengthen human rights due diligence and embed ethical practices across the Orora Group.

This is a joint statement covering Orora Limited and Orora Packaging Australia Pty Ltd, Chapview Pty Ltd and Orora Investments Pty Ltd (together, the **reporting entities**), the Saverglass Group (now operating as part of Orora Global Glass), and Orora Packaging Solutions (OPS), which was divested from the Orora Group during the reporting period (**Statement**). While not all entities within the Orora Group meet the Act's reporting threshold, this Statement applies to the Group as a whole, including operations in Australasia, North America, Europe, and the Middle East. For ease of reference, these entities are collectively referred to as "**Orora**", "**Orora Group**", or "**the Group**" throughout this document.

This Statement builds on the foundations laid in previous years, reflecting Orora's continued commitment to ethical business conduct, transparency, and continuous improvement in addressing and mitigating modern slavery risks. It provides a summary of our due diligence processes, identifies key risks, and details the steps taken in FY25 by Orora to reduce the risk of modern slavery within our business and supply chains.

Our approach is underpinned by robust governance structures and frameworks, including Orora's Human Rights Policy and Human Rights Due Diligence (**HRDD**) Framework. In FY25, we made further progress in embedding these policy and framework principles across the Group, including into the newly integrated business unit within Orora Global Glass.

This Statement should be read alongside Orora's FY25 Annual Report, which provides further details about our corporate governance, financial performance, and sustainability initiatives. Additional information can also be found in Orora's periodic and continuous disclosure announcements available on the Australian Securities Exchange (**ASX**) and at [www.ororagroup.com](http://www.ororagroup.com).

This Statement was approved by the Boards of Orora Limited, Orora Packaging Australia Pty Ltd, Chapview Pty Ltd and Orora Investments Pty Ltd. Brian Lowe, Managing Director and CEO of Orora Limited, has been authorised to sign this Statement on behalf of these entities.

# A Message from the Managing Director and CEO



**At Orora, we are committed to operating with integrity and ensuring that respect for human rights is at the heart of everything we do. As our global footprint continues to expand, so too does our responsibility to ensure our operations and supply chains are free from the risks of modern slavery and exploitation. Modern slavery is a deeply complex issue, and we understand that the risks are dynamic in nature.**

This year, we have made meaningful progress in embedding our human rights commitments across our business. We delivered a range of important actions under our Human Rights Due Diligence Framework, including a desktop risk assessment of our Tier-1 suppliers across the Group, the development and rollout of tailored human rights and modern slavery training and awareness materials, and enhancements to our governance and risk processes.

Notably, we conducted our first on-site human rights audit at one of our glass manufacturing operations thereby strengthening our understanding of risks in high-priority regions. We updated our Supplier Code of Conduct to reflect evolving regulatory expectations and reaffirmed our commitment to ethical sourcing. We also delivered modern slavery and human rights training to our Board and executive leadership team, ensuring ethical oversight and accountability remains embedded at the highest levels of the organisation.

As we look ahead, our focus will be on implementation and consistency - aligning our expectations and processes across operations in all regions and increasing engagement with those suppliers that present a higher level of risk.

We remain steadfast in our commitment to continuous improvement in this important area - working in collaboration with our partners, our suppliers and the communities in which we operate to drive positive change.

Thank you to our team members and stakeholders for your continued commitment and support in progressing this important work.

A handwritten signature in black ink, which appears to read "Brian Lowe". The signature is fluid and cursive.

**Brian Lowe**  
Managing Director and Chief Executive Officer  
Orora Limited

## 3

## Summary of Key Activities in FY25

In FY25, Orora built upon the foundations of its human rights due diligence (HRDD) program by deepening its focus on risk mitigation, supplier engagement, and strengthening oversight across its global operations and supply chains. Key activities undertaken during the year included:

Focus Area	Progress and Outcomes
Integration of HRDD in Global Glass Business	A gap assessment of HRDD practices was undertaken across the Global Glass business, benchmarking against Orora's enterprise-wide framework. Initial integration activities have commenced to align regional processes and supplier oversight mechanisms. Further work is planned in FY26 to fully embed consistent HRDD processes across all regions and operations.
Global Tier-1 Supplier Risk Assessment	Conducted a Group-wide desktop risk assessment of Tier-1 suppliers to identify elevated risk profiles, particularly across raw materials, logistics, and operations in high-risk regions. This informed our prioritisation of suppliers requiring further due diligence.
On-Site Human Rights Audit (Glass Operations)	Completed an independent human rights audit at Orora's Ras Al Khaimah (RAK) glass manufacturing site, reviewed labour management, working hours, grievance mechanisms and contractor conditions.
Supplier Code of Conduct Refresh	Undertook a comprehensive review of our Supplier Code of Conduct across the Orora Group. Updates included strengthened expectations on human rights, modern slavery, and ethical conduct, aligning with global regulatory developments.
Human Rights Awareness and Training Campaigns	Rolled out training modules and awareness campaigns across Australia, Mexico, Europe, and the Middle East, aimed at both salaried employees and contractors, with further activities planned for FY26.
Board and Executive Leadership Training	Delivered modern slavery and human rights training to Orora's Executive Leadership Team (ELT) and the Board of Orora Limited, reinforcing ethical oversight and leadership accountability.

These activities reflect Orora's continued commitment to strengthening its human rights due diligence practices, in line with both stakeholder expectations and global best practice. Further detail on these initiatives is provided in Section 6: Actions Taken to Address and Assess Risk and Section 8: Our Future Commitments.

# 4

## Our Structure, Operations and Supply Chains

### 4.1 Our Global Operations and Orora

Orora is a global leader in the design, manufacture and decoration of glass bottles and aluminium cans. Headquartered in Melbourne, Australia and listed on the ASX, Orora operates across Australasia, North America, and Europe, and in the Middle East through its Orora Global Glass division.

Orora employs around 4,300 people across 13 manufacturing plants worldwide. Our operations are structured under two key business divisions: Orora Cans and Global Glass.

In FY25, Orora began the process of divesting two of its businesses: OPS based in North America and the Orora Closures business based in South Australia. These transactions were completed by 12 December 2024 and 31 January 2025, respectively.

Through our Cans and Global Glass businesses, Orora delivers market-leading packaging innovations underpinned by a commitment to ethical business conduct, sustainable sourcing and respect for human rights throughout our global value chain.



13

Manufacturing plants



4

Decoration sites



~4,300

Team members



100+

Countries in which our products are enjoyed



### 4.1.1 Orora Global Glass



Orora’s Global Glass business manufactures and decorates premium glass bottles and containers through a network of seven strategically located facilities positioned close to major beverage production regions. This business supports both luxury brands and commercial wine and beer producers with high-quality, infinitely recyclable glass packaging.

Operating across four continents, Orora Global Glass is present in three distinct regions – Europe, the Americas, and Asia Pacific – providing the capability, agility and oversight needed to meet

customer demand, while upholding ethical sourcing standards across these diverse operating environments:

- Europe - Production and decoration sites in France and Belgium provide comprehensive coverage across the continent, including long-standing partnerships with leading champagne and spirits brands.
- Americas - A central production and decoration hub in Mexico services key North American markets, supporting the tequila, whiskey, and wine industries.

- Asia Pacific - The Gawler site in South Australia supports the commercial wine and beer markets, while the Ras Al Khaimah facility in the UAE operates as a strategic production and export hub for customers across Asia, the Middle East and beyond.

As Orora continues to grow its international presence, strong governance and due diligence remain essential to ensure that labour standards, health and safety, and ethical conduct are upheld across all operations and supply chains.

### 4.1.2 Orora Cans

As the largest and most innovative beverage can supplier across Australia, New Zealand and the Pacific Islands, Orora Cans provides industry-leading design, production, and decoration capabilities for aluminium can bodies and ends.

Our six can manufacturing sites across Australia and New Zealand enable efficient, flexible, and reliable supply to key customers in categories including carbonated soft drinks, beer, energy drinks, and alcoholic ready-to-drink beverages.

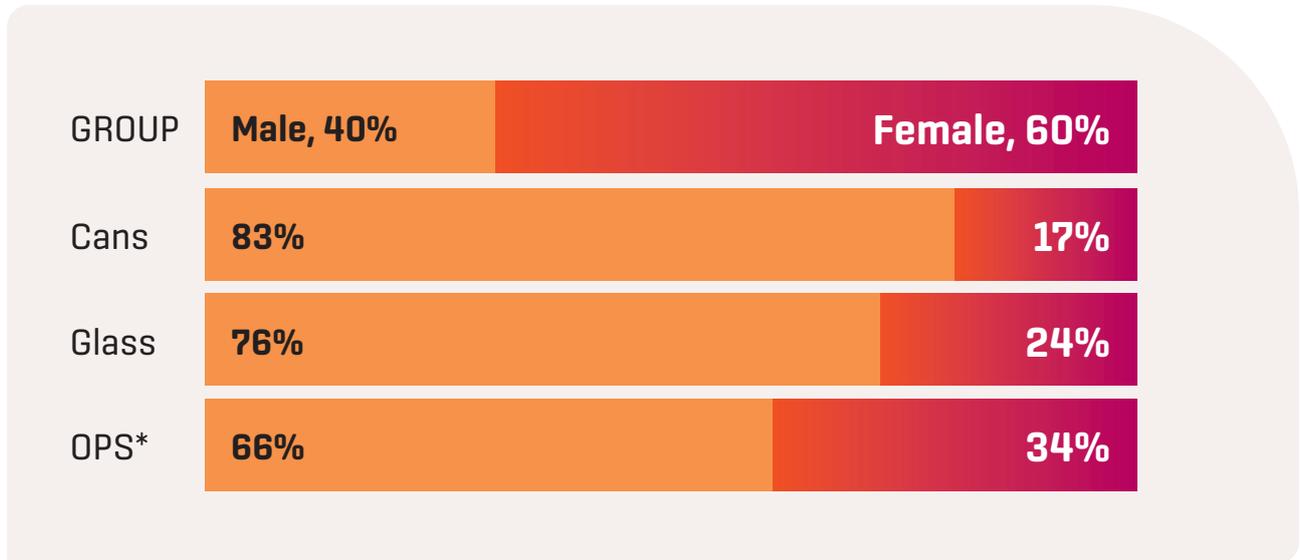
Through continuous investment in innovation and technology, Orora Cans delivers lightweight, recyclable packaging solutions that support circular economy outcomes and align with customer sustainability goals. Our leadership position also brings responsibility – we work closely with suppliers, logistics partners, and contractors to ensure that our production practices and raw material sourcing uphold Orora’s ethical and human rights standards.



## 4.2 Diversity, Equity, Inclusion and Belonging

At Orora, diversity and belonging are central to how we work. Our Belonging Policy, refreshed in FY25, reinforces our commitment to equitable hiring, development and promotion practices, ensuring every team member feels welcome, safe and valued. We actively measure and report on progress in this area to hold ourselves accountable.

In FY25, women represented 41% of Orora’s senior leadership team, up from 40% in FY24, and 36% of new hires—well above our 30% target. Across the business, gender representation differs by division, reflecting both the progress we’ve made and the unique challenges of navigating traditionally male-dominated manufacturing environments:



\*The OPS business was divested from the Group in FY25.

## 4.3. Global Procurement

In FY25, Orora continued to strengthen its global procurement framework to enhance transparency, support responsible sourcing, and reduce modern slavery risks across its operations. With the full integration of the Saverglass Group, Orora’s procurement network now extends across Australasia, North America, Europe, Asia and the UAE—underscoring the importance of consistent governance and supplier oversight.

High-risk procurement categories—such as raw materials, logistics and third-party contracting—remained a key focus in FY25. The refreshed Supplier

Assurance Framework (SAF) was embedded across Orora’s Australasian business, and work continued to integrate Saverglass’ supplier onboarding and evaluation processes with Orora’s evolving global standards.

During FY25, Orora also engaged an independent consultant to conduct a targeted assessment of high-volume and high-risk suppliers, particularly in regions with limited transparency. These assessments have enabled a more consistent, risk-based approach to supplier evaluation and modern slavery due diligence across the Group.

Work within Orora continues to harmonise procurement standards globally, guided by updated country risk profiles and evolving regulatory expectations. These efforts ensure Orora’s procurement activities remain aligned with our broader ethical sourcing objectives and sustainability commitments.

Further information on Orora’s approach to responsible sourcing is available at: [www.ororagroup.com/sustainability](http://www.ororagroup.com/sustainability).

## 4.4 Global Supplier Network

Orora's global supply chains reflect the scale and diversity of our operations across Australasia, North America, Europe and the Middle East. In FY25, we partnered with nearly 9,000 suppliers across more than 30 countries to source materials and services essential to our packaging solutions.

Our supply base included:

- **Raw materials** such as sand, soda ash, limestone, coal, glass cullet, aluminium, inks, paperboard and corrugate.
- **Finished and semi-finished goods**, including closures, moulds, decoration materials and logistics equipment.
- **Capital equipment and Maintenance, Repair and Operations (MRO)** supplies to support plant operations.
- **Labour and professional services**, including temporary staffing, construction, cleaning, and maintenance logistics.

The structure of our supply chains varied by region is as follows:

- **Australasia:** Strong domestic sourcing, though certain critical inputs—such as aluminium coils—are imported.
- **North America:** The divested OPS business was predominantly domestically supplied, with limited international procurement.
- **Europe and the Middle East:** Saverglass sources materials and services both locally and internationally, including from higher-risk regions such as the UAE and Mexico.

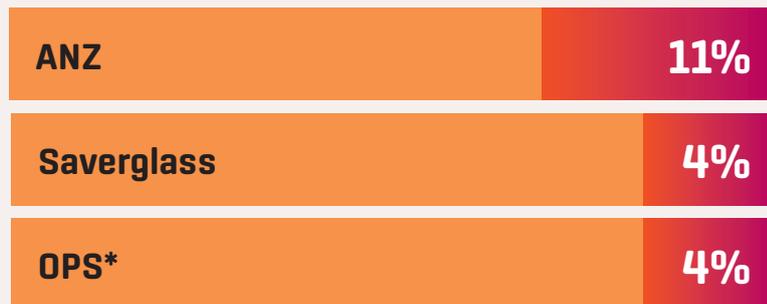
Following the creation of the Orora Global Glass business unit, our supplier footprint expanded significantly across Western Europe, North America and the Middle East/South-West Asia. For Saverglass, these markets are considered domestic due to their proximity to production facilities. For Australian and New Zealand (ANZ) operations, Australia and New Zealand

are considered domestic, while countries such as China, Singapore, the UAE, Germany and the UK are classified as international. For Orora Packaging Solutions (OPS), the United States, Mexico, and Canada are categorised as domestic.

Most of Orora's procurement spend remains with domestic suppliers, thereby supporting local economies and allowing greater oversight of supplier practices. In FY25:

- **Saverglass:** 95% of spend and 96% of suppliers were domestic.
- **ANZ:** 51% of spend and 89% of suppliers were domestic.
- **OPS:** 99% of spend and 96% of suppliers were domestic.

### Percentage Domestic vs International Suppliers



\*The OPS business was divested from the Group in FY25.

# 5

## Our Governance and Due Diligence Approach

### 5.1 Our Due Diligence Approach

Respecting and protecting human rights remains fundamental to Orora's sustainability approach and our commitment to operating responsibly across all regions. In FY25, we strengthened our efforts to identify, manage, and mitigate modern slavery risks throughout our operations and supply chains, ensuring alignment with international standards and evolving stakeholder expectations.

Our human rights strategy is embedded within Orora's three sustainability pillars – Circular Economy, Climate Change, and Community – which form the foundation of our Promise to the Future. This promise defines how we operate, innovate, and invest to create long-term value for our people, our customers and the communities in which we operate.

Through our Community Pillar, we focus on advancing human rights, fostering inclusion and building stronger, safer workplaces.

In FY25, we expanded our due diligence efforts, deepening supplier engagement and enhancing risk identification across higher-risk regions and categories. Guided by our HRDD Framework, we applied a structured, risk-based approach to identifying and addressing potential human rights impacts, including modern slavery and forced labour.

We also continued to embed human rights considerations into our procurement and supplier management processes, prioritising suppliers who demonstrate strong ethical, labour, and environmental, social and governance (ESG) standards. This

ensures our sourcing practices go beyond compliance, actively supporting the creation of fair and resilient supply chains.

Our commitment extends beyond risk management. We aim to deliver meaningful social impact by supporting local procurement, strengthening supplier capability and fostering shared value in the communities where we operate.

Further information on Orora's broader sustainability performance and governance is available in our FY25 Annual Report and at [www.ororagroup.com/sustainability](http://www.ororagroup.com/sustainability).

## Sustainability is our *promise to the future*

### Our Sustainability pillars



#### Circular Economy

- Recycled Content
- Recyclable packaging
- Recyclable substrates
- Lightweighting

#### Orora Glass targets

68% recycled content for colour glass beverage containers by FY35\*

#### Orora Cans targets

80% total recycled content in aluminium cans by FY30\*\*



#### Climate Change

- GHG emissions reduction
- Energy efficiency
- Low carbon energy
- Climate risk analysis

#### Orora Group targets

Net zero GHG emissions by 2050  
 Scope 1 and 2 - 41% reduction in GHG emissions by FY35 from a FY19 baseline [absolute tonnes]  
 Scope 3 - 31% reduction in GHG emissions by FY35 from a FY25 baseline [absolute tonnes]



#### Community

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

#### Prioritising action for our people and our community

Protecting safety, health and human rights  
 Championing diversity, equity and inclusion

\* Colour glass only excluding flint and extra flint glass - post consumer, post-industrial use, excludes internal reuse glass

\*\* Total recycled content including post-consumer and post-industrial

## 5.2 Our Human Rights Due Diligence Framework

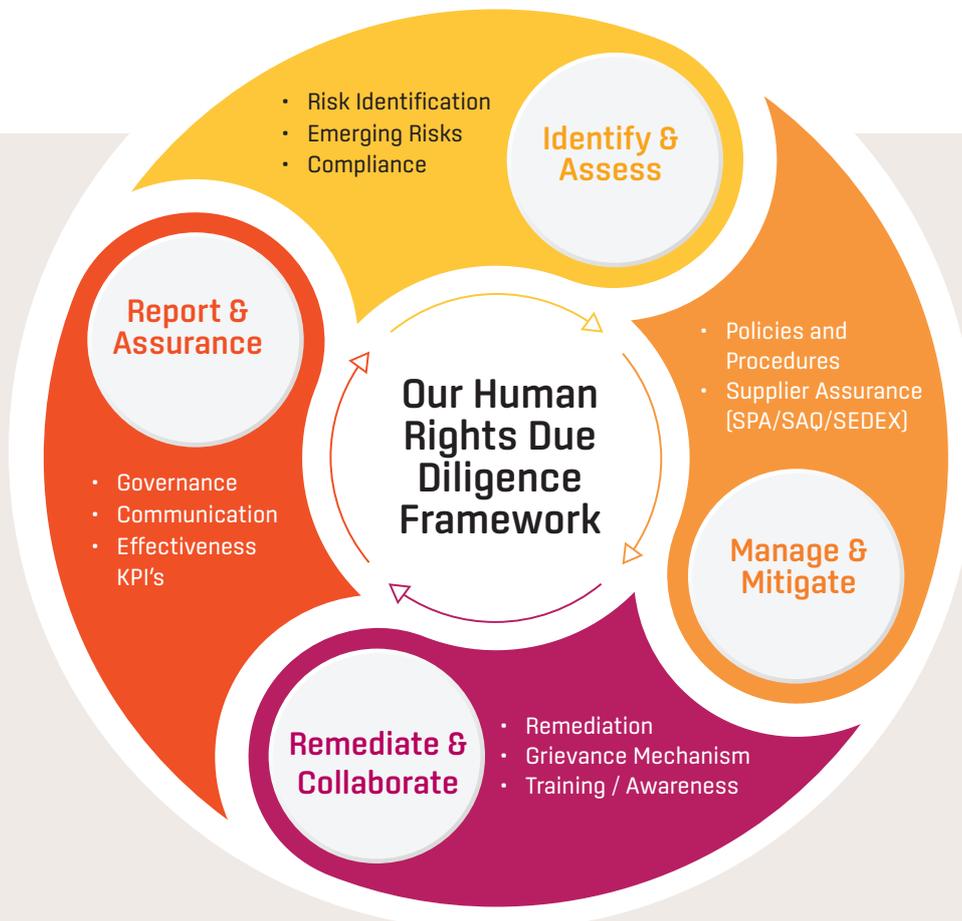
At Orora, respecting and protecting human rights is integral to how we operate. Our HRDD Framework plays a central role in identifying, addressing and managing modern slavery and broader human rights risks across our global operations and supply chains. Enhanced in FY24 and further embedded in FY25, the HRDD Framework continues to guide our risk-based approach to ethical business conduct.

Aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and consistent with guidance<sup>1</sup> from the Australian Government, the HRDD Framework ensures our processes remain proactive, transparent, and effective. It is built on the following four core pillars:

Framework Element	FY25 Activity and Focus
1 Identify and Assess	We continued to assess potential and actual human rights impacts – particularly in high-risk regions. Supplier risk profiles were updated based on emerging data, external indices, and detailed due diligence conducted with targeted suppliers.
2 Manage and Mitigate	Human rights risks were integrated more deeply into our supplier onboarding and assurance processes. Updates to the SAF and the implementation of our HRDD Framework enhanced our ability to act on risk insights.
3 Remediate and Collaborate	Where potential risks were flagged, we engaged directly with suppliers to address root causes. In FY25, we commenced the development of tailored action plans and supported collaborative solutions, particularly in cases where forced labour indicators were present.
4 Report, Escalate and Assure	Our Board, ELT and relevant committees were regularly updated on our due diligence progress. Stakeholders were kept informed through transparent disclosures and internal assurance processes were strengthened to verify controls.

Orora's Framework remains dynamic – evolving as we encounter new risks, and as global supply chains and expectations continue to shift. We are committed to ensuring it remains fit-for-purpose by reviewing it regularly, applying lessons learned, and integrating international best practices.

This structured approach enables us not only to meet our compliance obligations, but to create meaningful change through ethical sourcing and responsible business partnerships.



1 :[https://modernslaveryregister.gov.au/resources/Commonwealth\\_Modern\\_Slavery\\_Act\\_Guidance\\_for\\_Reporting\\_Entities.pdf](https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf)

## 5.3 Governance and Oversight

Orora’s governance framework underpins our commitment to accountability, transparency, and effective management of modern slavery and broader human rights risks. In FY25, we further strengthened governance structures to embed our HRDD Framework across all levels of the organisation.

### Board Oversight

Orora Limited’s Board of Directors (Board) holds ultimate responsibility for our human rights and modern slavery commitments, ensuring alignment with our strategic objectives, ethical principles and legal obligations. The Board receives regular updates on progress, emerging risks and key initiatives.

### Safety, Sustainability, and Environment Committee (SSEC)

As a Committee of the Board, the SSEC provides focused oversight on sustainability, including human rights and modern slavery. In FY25, it reviewed the effectiveness of our due diligence processes, endorsed key risk mitigation measures and supported initiatives that reinforce our ethical

### Our Governance Model



\* Otherwise known as Executive Leadership Team

sourcing commitments. This includes upholding the Company’s commitment as a signatory to the United Nations Global Compact (UNGC).

### Executive Leadership Team (ELT)

Led by the Managing Director and CEO of Orora, the ELT is responsible for executing Orora’s human rights strategy across all business functions and geographies. In FY25, it oversaw the continued integration of modern slavery risk management into procurement, manufacturing and supply chain operations, with a particular focus on high-risk regions.

### Human Resources Committee

The Board Committee advises the Board on people, culture, and remuneration, and ensures internal workforce practices support Orora’s human rights objectives. It also provides guidance on community engagement activities.

### Audit, Risk and Compliance Committee

The Audit, Risk and Compliance Committee of the Board monitors internal controls relating to modern slavery risk, informed by reports from Orora’s risk and assurance teams. In FY25, these insights drove improvements to our compliance systems and enhanced our ability to detect and respond to potential risks.

### Cross-Functional Working Groups

Orora’s cross-functional working groups bring together Procurement, People and Culture, Operations, Legal, Sustainability and Risk to coordinate our response to human rights risks. In FY25, these groups advanced high-risk supplier reviews, implemented enhanced due diligence measures and refined tools such as the SAF, enabling more proactive and agile risk management.

Orora’s governance approach is designed to evolve. As expectations around business and human rights continue to grow, we will continue to review and improve our structures, ensuring they support best practice and drive meaningful outcomes.

## 5.4 Our Policies and Processes

At Orora, our governance framework establishes clear expectations for ethical conduct and embeds respect for human rights across our operations and supply chains. Our commitment to preventing modern slavery is reflected in a suite of policies and procedures that guide responsible decision-making and strengthen accountability.

Policy / Process	Purpose & Focus
<b>Human Rights Policy</b>	Formalises Orora’s commitment to internationally recognised human rights principles, guiding the identification, management, and mitigation of risks—particularly modern slavery—via our HRDD Framework.
<b>Code of Conduct and Ethics Policy</b>	Establishes ethical standards for all Orora team members and business partners, reinforcing honesty, integrity, transparency and the expectation that third parties engaged by the Group also uphold human rights principles.
<b>Respect Policy</b>	Promotes a safe, inclusive and respectful workplace free from harassment, discrimination, victimisation and bullying.
<b>Belonging Policy (formerly Diversity, Equity &amp; Inclusion Policy)</b>	Reaffirms our commitment to fairness, inclusion, and equitable representation, ensuring all individuals can thrive and contribute to Orora.
<b>Integrity Reporting Service (Whistleblower Policy)</b>	Provides a safe, confidential mechanism to report concerns, including potential modern slavery, with protection from retaliation.
<b>Supplier Code of Conduct</b>	Defines ESG standards and responsible sourcing commitments for all suppliers, explicitly prohibiting modern slavery and requiring compliance with ethical sourcing expectations.
<b>Anti-Bribery and Anti-Corruption Policy</b>	Sets out Orora’s zero-tolerance approach to bribery and corruption, ensuring ethical conduct in all business dealings and reinforcing accountability across operations and supply chains.
<b>Environmental Policy</b>	Establishes Orora’s commitment to environmental stewardship, sustainability and responsible resource management, supporting ethical practices across our operations and supply chains.

## 5.5 Training, Awareness, and Capacity Building

At Orora, we recognise that effective modern slavery prevention starts with awareness, education, and accountability. Ensuring our people, leaders and partners understand how to identify, assess, and respond to potential modern slavery and human rights risks is central to our HRDD Framework.

In FY25, we expanded and enhanced our training and awareness programs to reflect evolving global regulations, emerging risks, and international best practice. All members of Orora Limited's Board and ELT completed tailored training on modern slavery and human rights, reinforcing their oversight responsibilities

and embedding human rights considerations into strategic decision-making.

The mandatory modern slavery training module was refreshed and rolled out to all salaried employees globally, achieving close to 800 completions during FY25. The updated module provides practical guidance on due diligence processes, escalation pathways and ethical reporting mechanisms, complementing existing programs on fraud, corruption, whistleblower protections and Orora's Code of Conduct and Ethics Policy.

Across the Global Glass division, targeted initiatives deepened local understanding of labour rights. This included a UAE-based workshop, delivered with an external consultant, that used region-specific case studies to strengthen awareness of migrant worker vulnerabilities and regional labour law dynamics.

Through these initiatives, Orora continues to build organisational capability and reinforce a culture of vigilance, ensuring our teams and partners play an active role in safeguarding human rights and preventing modern slavery across our global operations and supply chains.

## 5.6 Grievance and Remediation

Orora provides clear and accessible grievance channels to ensure concerns can be raised safely, confidentially, and without fear of retaliation. Our Whistleblower Policy and Integrity Reporting Service, managed independently by Deloitte Halo, are available 24/7 to all employees, contractors and suppliers.

In FY25, no instances of modern slavery or human rights concerns were raised through Orora's grievance or integrity channels. Saverglass introduced a

Whistleblower Policy aligned with both French legal requirements and Orora's Integrity Reporting Service, ensuring consistent coverage and protections across all sites. Oversight of these mechanisms is maintained through regular reporting to the Audit, Risk and Compliance Committee and the Human Resources Committee of the Board.

Where issues arise, Orora's remediation approach emphasises fairness, transparency and meaningful outcomes for affected stakeholders.

Looking ahead to FY26, Orora will continue to strengthen awareness and accessibility of its grievance channels, expand engagement across all regions, and ensure alignment with evolving global and Australian regulatory expectations, including guidance from the Australian Anti-Slavery Commissioner.

## 5.7 Identifying Modern Slavery Risks

### 5.7.1 United Nations Guiding Principles on Business and Human Rights (UNGPs)

Orora is committed to identifying, addressing and preventing modern slavery risks across our operations and supply chains. Our approach is guided by the UNGPs, which provide a globally recognised framework for managing human rights impacts on our business operations. In line with these principles, we assess our potential involvement in modern slavery through three lenses: cause, contribute, and directly linked.

#### Directly Caused

Modern slavery risks may arise directly within our operations, for example, through inadequate wages, unsafe working conditions or excessive working hours. To mitigate these risks, Orora upholds lawful employment practices, implements regular site audits and delivers mandatory training on employee rights and ethical conduct. These measures help ensure safe, fair and compliant working environments across all sites.

#### Indirectly Contributed

Orora recognises that our commercial practices, such as cost, lead-time or sourcing pressures could indirectly contribute to modern slavery risks within our supply chain, particularly in regions with limited labour protections. We address this by maintaining ethical sourcing standards, embedding fairness into procurement processes and working collaboratively with suppliers to improve transparency and build capacity for responsible labour practices.

#### Directly Linked via Supply Chain

We may also be directly linked to modern slavery risks through our suppliers or their subcontractors, even where we have not caused or contributed to the issue. Our SAF provides structured oversight, requiring suppliers to disclose ESG and labour practices. High-risk suppliers are subject to enhanced due diligence and must comply with our Supplier Code of Conduct (along with all of Orora's suppliers), which explicitly prohibits forced labour and modern slavery. These mechanisms extend visibility and accountability beyond Tier 1 suppliers and strengthens governance across our global value chain.

### 5.7.2 Defining Our Risk Profile

Orora takes a dynamic, evidence-based approach to understanding and managing modern slavery risks. In FY25, we refined our risk profile by combining internal analytics, supplier assessments and external benchmarks to identify and prioritise potential risks.

We reference publicly available resources, including the Global Slavery Index, the International Labour Organisation's modern slavery statistics and the United Nations Global Compact, alongside third-party platforms such as SEDEX (Supplier Ethical Data Exchange) and EcoVadis. These tools help assess systemic vulnerabilities in regions, products and industries where modern slavery risks are heightened.

Our monitoring approach is ongoing. We track legislative and regulatory developments, gather insights from supplier self-assessments and review reports through our confidential Integrity Reporting Service to ensure emerging risks are identified and addressed promptly.

### 5.7.3 Potential Modern Slavery Risks

Orora's modern slavery risk assessment considers geographical, sector, supplier, and operational factors. Certain regions carry elevated risks due to weak labour laws, poor governance, corruption, or socio-economic instability. High-risk sectors, such as logistics, manufacturing and raw material sourcing, often rely on low-skilled, low-wage labour and involve complex supply chains. Suppliers with limited transparency, poor labour standards, or inadequate human rights policies are also considered higher risk. Modern slavery risks may also arise within Orora's own operations, particularly through procurement practices, indirect labour or third-party service providers.

We acknowledge inherent risks exist across our global supply chain, including in areas such as conflict minerals, low-cost sourcing regions, labour hire firms, shipping and logistics, and high-risk countries or regions. Where possible, we mitigate these risks through domestic sourcing and rigorous supplier risk assessment and monitoring.

By integrating the principles outlined in the UNGPs, evidence-based risk profiling and mitigation strategies across our supply chain, Orora aims to ensure that modern slavery risks are identified, assessed, and managed. This approach maintains ethical sourcing, upholds human rights and contributes to long-term sustainability across our operations and value chain.

## 6

# Actions Taken to Assess and Address Risks

In FY25, Orora strengthened its approach to HRDD by expanding supplier risk assessments and deepening engagement with high-risk partners across its global supply chain. These actions are guided by our HRDD Framework and aligned with the UNGPs.

Our FY25 program focused on three core areas:

1. Global Tier-1 Supplier Risk Assessment
2. Factory-Level Due Diligence (RAK Site Audit)
3. Enhanced Monitoring, Training and Remediation

Each initiative targeted regions, sectors and supplier categories where modern slavery risks are most likely to occur.

## 6.1 Global Tier-1 Supplier Risk Assessment

Orora worked with a third-party consultant to complete a comprehensive risk assessment of its top 500 Tier-1 suppliers across the Australasian business including Corporate, Cans and the Global Glass division. A two-stage methodology was employed combining global risk data with Orora-specific insights:

**Inherent Risk Assessment** – Suppliers were evaluated using external datasets such as the Global Slavery Index, World Bank Governance Indicators and Freedom House scores. Twenty metrics were analysed, covering labour conditions, governance and gender equality, with results applied by industry and geography.

**Adjusted Risk Assessment** – Findings were refined using Orora-specific factors including supplier spend, criticality to operations and depth of relationship. This helped identify where Orora's influence can be most effective in driving change.

Key Insights arising from third-party risk assessment included:

- **Geographies:** UAE, China, Mexico, India and Saudi Arabia—linked to weaker labour protections or reliance on migrant labour.
- **Sectors:** Raw-material extraction (aluminium, sand, gypsum, calumite), waste management, cleaning and logistics—characterised by low-wage, low-skill workforces.
- **Products:** Aluminium and silica sand present known upstream exposure to modern slavery.
- **Supplier visibility:** Limited insight beyond Tier 1 for critical inputs.

The analysis highlighted the top 50 suppliers with the highest combined inherent and adjusted risk scores, who are now prioritised for enhanced engagement and monitoring.

Planned FY26 Actions

- Commence a phased due diligence approach due diligence on the top 50 suppliers using Supplier Assessment Questionnaires (SAQs), public disclosure reviews and document verification.
- Implement engagement plans and corrective actions if and where required.
- Further refine the SAF to prioritise high-risk sectors and geographies.
- Align Cans and Global Glass supplier-screening practices under a unified ethical-sourcing standard.

## 6.2 RAK Site Audit – Factory-Level Due Diligence

As part of our ongoing integration of Human Rights Due Diligence (HRDD) across the Global Glass business, Orora undertook a comprehensive labour and human rights audit at its Ras Al Khaimah (RAK) glass manufacturing facility located in the United Arab Emirates (UAE). Recognising the elevated human rights risks in the Middle East, this independent, third-party assessment formed a key component of Orora's HRDD Framework. The audit aimed to enhance transparency and oversight of working conditions, labour management practices, and supplier compliance within a high-risk operating environment, reinforcing Orora's commitment to responsible and ethical business practices.

The RAK site employs a workforce of approximately 250 directly hired employees and 50 contracted workers through third-party labour providers – many of whom are migrant workers. Given this workforce composition, the audit focused on key risk areas commonly associated with modern slavery exposure, ensuring a thorough assessment of both direct and indirect employment practices.

Audit focus areas:

- Working hours, overtime and rest days;
- Employment contracts, documentation and legal compliance;
- Worker accommodation and access to healthcare;
- Recruitment practices, including payment of fees and retention of passports; and
- Access to grievance mechanisms and worker representation.

### Key findings

The audit confirmed that Orora's labour and human rights practices are broadly aligned with our Code of Conduct and Ethics Policy and other related policies, demonstrating strong governance and commitment to fair treatment of employees.

The audit also identified several areas for improvement among some third-party labour providers, highlighting gaps against Orora's standards and expectations outlined in our Supplier Code of Conduct. These included:

- Passport custody
- International recruitment and visa costs
- Incomplete or inconsistent employment contracts among some contracted workers
- Accommodation Standards
- Limited awareness among contracted workers of available grievance mechanisms
- Staff rostering
- Gaps in onboarding and training processes for third-party labour providers, which is required to align with Orora's Supplier Code of Conduct

While these issues were confined to some of our third party labour providers rather than Orora's directly employed workforce, the audit reaffirmed the importance of strengthening controls, oversight and communication throughout the extended supply chain.

### Governance and response

In response to the audit findings, Orora established a dedicated Labour and Human Rights Working Group (**Working Group**), chaired by senior members of the Sustainability, Procurement and People & Culture teams. The Working Group reports to a dedicated Labour and Human Rights Steering Committee (**Steering Committee**), which in turn provides regular updates to the SSEC of the Board.

This governance structure ensures transparent oversight, accountability, and coordination of all corrective actions. The Working Group has initiated the development of detailed Corrective Action Plans, with defined timeframes, responsible leads, and escalation processes to ensure timely resolution of identified gaps.

### Follow-up actions in progress:

- Engaging third-party labour providers to build awareness and compliance with Orora's Supplier Code of Conduct and its human rights expectations, including implementing corrective action plans.
- Strengthening contractor onboarding and management processes to ensure consistency with Orora's HRDD Framework.
- Conducting targeted human rights and ethical recruitment training for site leaders and contractor supervisors.
- Increasing communication, availability and visibility of grievance mechanisms for all workers including contractors.
- Monitoring implementation of corrective actions through quarterly reviews by the Steering Committee.

As at the end of FY25, encouraging progress has been made, with most labour providers actively implementing the required improvement measures. One provider, however, was unable to meet the corrective actions despite extensive consultation. In line with the expectations set out in our Supplier Code of Conduct, Orora made the decision to cease this business relationship.

Overall, Orora is satisfied with progress to date and continues to monitor outcomes closely to ensure improvements are sustained and further embedded throughout FY26 and beyond.

This audit represents a major milestone in operationalising Orora's HRDD Framework at the site level. It provides a clear roadmap for continuous improvement, ensuring that our operations, and those of our partners, uphold the highest standards of human rights and ethical practice.

The findings and response actions will also inform future site assessments, including a planned labour and human rights audit at Orora's Mexican site in FY26.

## 6.3 Strengthening Tools, Training, and Processes

Throughout FY25, Orora continued to embed modern slavery risk management into business practices by enhancing internal tools and strengthening team capability:

- **Updated SAQ:** Expanded to capture ethical recruitment and human-rights indicators aligned to global best practice.
- **Leadership training:** Delivered modern slavery and human-rights training to executives and procurement teams worldwide.
- **Policy integration:** Modern slavery requirements embedded within supplier management procedures and contract templates.

### Ongoing Monitoring and Continuous Improvement

- Regular supplier performance reviews and compliance checks against Orora's Supplier Code of Conduct.
- Increased collaboration across business units to standardise ethical-sourcing practices.
- Continuous tracking of evolving modern slavery regulations in Australia and the European Union.
- No modern slavery incidents were reported through Orora's grievance channels or Integrity Reporting Service in FY25.

### Summary

Through targeted risk assessments, on-site audits, enhanced supplier engagement and improved training and monitoring tools, Orora has continued to mature its HRDD Framework in FY25. These actions reinforce our commitment to ethical sourcing, transparency, and continuous improvement in preventing modern slavery across our global operations and supply chains.



## Assessing the Effectiveness of Our Actions

Orora is committed to continually improving how we identify, address and manage modern slavery risks across our operations and supply chains. Our evaluation approach is guided by the UNGPs and embedded within our HRDD Framework to ensure our actions deliver measurable and meaningful outcomes.

In FY25, Orora strengthened its evaluation processes by embedding feedback mechanisms, enhancing data collection and conducting targeted supplier and site-level assessments. Key measures included:

- **Supplier Risk Assessment:**  
A comprehensive Tier-1 supplier assessment was completed for our Corporate, Global Glass and Cans businesses, updating risk profiles using external benchmarks such as the Global Slavery Index. A detailed supply chain heatmap was developed to prioritise due diligence and engagement in FY26.
- **Management and Mitigation:**  
Over 230 new suppliers were assessed under the SAF for the Australasian Cans and Corporate business. Modern slavery and human rights training was delivered to the Board and ELT, and key policies—including the Human Rights Policy and Supplier Code of Conduct—were reviewed and translated into French and Spanish for integration across Saverglass operations.
- **Remediation and Grievance Mechanisms:**  
Saverglass introduced a local Whistleblower Policy, aligned with French legislation requirements and Orora's global standards. No modern slavery-related grievances were reported in FY25. Findings from the UAE Site Audit informed FY26 plans for enhanced grievance awareness and remediation protocols.
- **Governance and Reporting:**  
Quarterly updates were provided to Orora's governance committees, internal supplier risk process reviews were completed, and a structured reporting procedure was established for Saverglass' Risk Committee to ensure consistent oversight.

Key enhancements in FY25 included improved supplier risk assessment tools, targeted engagement with high-risk suppliers, a detailed audit of labour conditions in the UAE and strengthened governance mechanisms at Saverglass to improve visibility and accountability.

Through these initiatives, Orora continues to build a robust, transparent, and outcome-driven approach to human rights due diligence—supporting continuous improvement and positive social impact across our global operations and supply chains.

## 8

## Our Future Commitments

At Orora, addressing modern slavery risks is a continuous journey. Building on the progress made in FY25, we are focused on deepening implementation, strengthening supplier partnerships, and enhancing site-level due diligence. As global expectations and regulatory requirements evolve, we are committed to embedding our HRDD Framework across all regions and operations.

### Key Priorities for FY26

Planned Action	Objective
Human Rights Audit - Mexico	Conduct a comprehensive site-level audit to assess labour conditions, grievance mechanisms, documentation practices, and third-party contractor management.
Targeted Engagement with Tier-1 Suppliers	Work closely with higher-risk suppliers identified in FY25 to conduct deeper due diligence, implement corrective actions and strengthen collaborative risk mitigation efforts.
Awareness Campaigns - RAK	Launch site-level education initiatives to increase understanding of human rights and whistleblower reporting, thereby empowering workers and contractors to raise concerns safely.
Governance Alignment - Saverglass/ Global Glass	Continue integrating supplier screening, audit reporting, and risk oversight with Orora Group standards, thus reinforcing formal reporting channels and accountability.
Audit Readiness & Compliance	Prepare for anticipated updates to the Act by enhancing internal reporting, record-keeping, and due diligence practices.

Through these actions, Orora is strengthening oversight and building supplier capacity, and fostering a culture of accountability across our global operations. By proactively identifying risks, promoting transparency, and collaborating with partners, we are embedding ethical sourcing practices and human rights protections into the core of our business

# Appendices

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

This table sets out how Orora’s Modern Slavery Statement for FY25 addresses the mandatory reporting criteria outlined in The Act.

Section 16 - Mandatory Criteria [Modern Slavery Act 2018 (Cth)]	Section Reference in this Statement
a) Identify the reporting entity.	Section 1 – About this Statement
b) Describe the structure, operations, and supply chains of the reporting entity.	Section 4 [4.1 to 4.4]– Orora Structure, Operations, and Supply Chains
c) Describe the risks of modern slavery practices in the operations and supply chains of the entity, and any entities that the reporting entity owns or controls.	Section 5.7 [5.7.1 to 5.7.3] – Identifying Modern Slavery Risks
d) Describe the actions taken to assess and address those risks.	Section 5 [5.1 - 5.6] - Our Governance and Due Diligence Approach, in particular Section 5.6 – Due Diligence – Actions Taken
e) Describe how the reporting entity assesses the effectiveness of actions taken.	Section 6 – Actions Taken to Assess and Address Risks and Section 7 - Assessing the Effectiveness of Our Actions
f) Describe the process of consultation with entities owned or controlled by the reporting entity.	Section 5.3 - Governance and Oversight and Appendix 2 – Joint Statement and Consultation
g) Include any other relevant information the entity wishes to include.	Throughout the Statement, including Section 2 – Message from CEO, Section 3 - Summary of Key Activities in FY25 and Section 8 – Our Future Commitments

## Appendix 2 – Joint Statement and Consultation

This Modern Slavery Statement has been prepared on behalf of Orora Limited (ASX: ORA) and reflects the activities of all reporting entities within the Orora Group, including Orora Packaging Australia Pty Ltd, Saverglass Group entities, and Orora Packaging Solutions (for the 6 months prior to its divestment).

Orora operates across diverse regions—including Australasia, North America, and Saverglass’ international markets—yet maintains a consistent corporate governance and risk management framework throughout the Group. Approved by the Orora Board, this framework ensures all entities work together to identify, assess, and mitigate modern slavery risks in a consistent and accountable way.

This Statement was developed through consultation with a broad range of

stakeholders across the Orora Group, including:

- The Executive Leadership Team (ELT)
- Board Committees, including the Audit, Risk and Compliance Committee and the Safety, Sustainability & Environment Committee (SSEC)
- Cross-functional working groups from sustainability, procurement, legal, risk, finance, human resources, and operations teams
- Representatives from each reporting entity and business unit, including the Saverglass and OPS teams.

This collaborative approach ensured that all Orora-controlled entities contributed to the identification of key risks, informed due diligence

activities, and confirmed alignment with our human rights and modern slavery commitments. It reflects Orora’s approach to embedding ethical practices and accountability throughout our global operations and supply chains.

This Statement should be read alongside Orora’s other public disclosures, including the FY25 Annual Report and Corporate Governance Statement, which are available at <https://www.ororagroup.com/investors>.

This Statement was approved by the Boards of Orora Limited, Orora Packaging Australia Pty Ltd, Chapview Pty Ltd and Orora Investments Pty Ltd and is authorised for signature by:

Brian Lowe  
 Managing Director and CEO  
 Orora Limited  
 Date of Approval: 5 December 2025

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