



**This disclosure statement, as required by the California Transparency in Supply Chains Act of 2010, is specific to Orora Packaging Solutions, its divisions, subsidiaries and affiliated entities in North America (“Orora”)**

In 2010, the State of California adopted the Transparency in Supply Chains Act, which requires certain retailers and manufacturers to post a disclosure statement on their web site detailing whether, and to what extent, they investigate or monitor slavery or human trafficking in their direct product supply chains.

Orora hereby declares that it requires suppliers in its direct product supply chains to comply with applicable laws, regulations and standards, will investigate claims brought to its attention regarding the use of slavery or human trafficking by its suppliers, and will take appropriate action to discontinue use of a supplier that uses such labor. Orora management is not aware of any claims regarding the use of slavery or human trafficking by any member of Orora’s direct supply chains since the company was founded in 1948.

### **Verification**

Orora has commenced an internal vendor risk assessment analysis in respect of the countries it procures goods and services to its North American operations. Orora has not yet employed a third party to audit or evaluate its supply chains to evaluate and address risks of human trafficking or slavery.

### **Audit**

Orora has minimum supplier standards (contained in the Orora Group’s Supplier Code of Conduct and Ethics Policy), including in respect of human trafficking and slavery, but has not yet conducted supplier audits to evaluate whether suppliers comply with these standards.

### **Certification**

Orora further requires direct suppliers to certify through its procurement standard contract suite and purchase order terms and conditions that materials

incorporated into products or services provided to Orora comply with the laws, regulations and standards addressing human trafficking and slavery of the country or countries in which they are doing business, and that they adhere to the Orora Group's Supplier Code of Conduct and Ethics Policy, which includes a commitment to provide a work environment free from all forms of modern slavery.

### **Internal Accountability**

Orora maintains internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and trafficking through performance reviews and internal grievance mechanisms. Orora also operates an Integrity Reporting Services through an independent third party to facilitate reporting by co-workers and third parties of reasonably suspected misconduct or an improper state of affairs or circumstances within Orora. Each report to the Integrity Reporting Service is investigated thoroughly and appropriate action taken where necessary. Matters raised via the Orora Integrity Reporting Service are reported to the Board of Orora Limited.

### **Training**

All Orora employees are required to comply with the Orora Group Code of Conduct and Ethics Policy, which, amongst other things details Orora's commitment to upholding high standards for human rights. Orora has not yet provided more detailed modern slavery training to company employees and management who have direct responsibility for human resources or supply chain management; however, Orora plans to provide such employees and management training during Fiscal Year 2021.

**This disclosure statement is supplementary to, and should be read in conjunction with, the current version of Orora Group's Modern Slavery Statement available at [www.ororagroup.com/about/Modern-Slavery](http://www.ororagroup.com/about/Modern-Slavery)**



Orora  
Modern Slavery  
Statement FY20

# Introduction

Orora Limited (**Orora**) is pleased to submit its Modern Slavery Statement for the financial year ended 30 June 2020 (**FY20**), 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 FY20 Annual Report and Corporate Governance Statement, which are available at <https://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 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.

## In this statement

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# Orora's approach and commitment

## We oppose all forms of slavery in our operations and the operations of our suppliers

We have always been committed to our people, and the protection of human rights.

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

Our sustainability activities are guided by our three pillar program of People, Planet and Prosperity, which aligns to 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 and Corporate Governance Statement, which should be read in conjunction with this statement. Further information on our approach to sustainability can be found in our 2020 Annual Report and Corporate Governance Statement available at <https://www.ororagroup.com/investors>.

We are committed to identifying, assessing and mitigating human rights impacts, providing access to remedy through effective grievance or complaint mechanisms and ensuring continuous improvement to strengthen our actions. 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 monitor our progress by:

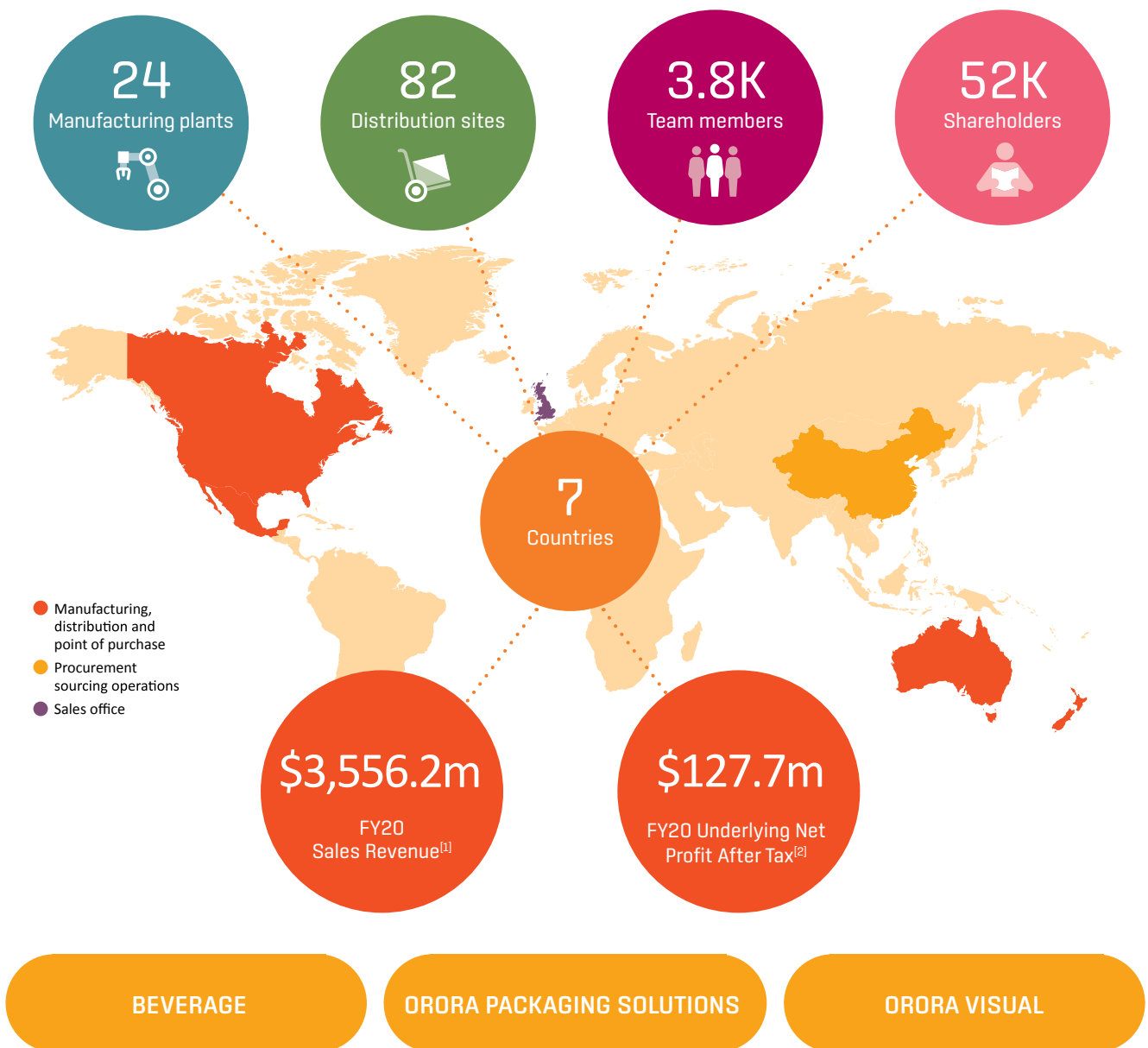
- understanding, refining and improving our processes to identify and manage modern slavery and broader human rights risks
- working across the Orora Group to promote human rights and identify opportunities to collaborate to enhance our management of human rights risks
- seeking to anticipate the evolving nature of human rights and Orora's responsibility with respect to human rights

# About Orora

Orora's goal is to be a leading sustainable packaging solutions provider

Orora is listed on the Australian Securities Exchange (**ASX**), with principal businesses located in Australia, New Zealand and North America. 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 1 depicts our operations at a glance as at 30 June 2020 (excluding the divestment of our Australasian Fibre Business on 30 April 2020).

Figure 1



(1) Excludes a significant item expense of \$137.2 million relating to restructuring activities and recoverable asset impairment charges in North America

(2) Net profit after tax before significant items and including discontinued operations (Australasian Fibre Business)

# Orora's operations and supply chains

Orora has a large, geographically diverse and complex supply chain to support its 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 materials (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

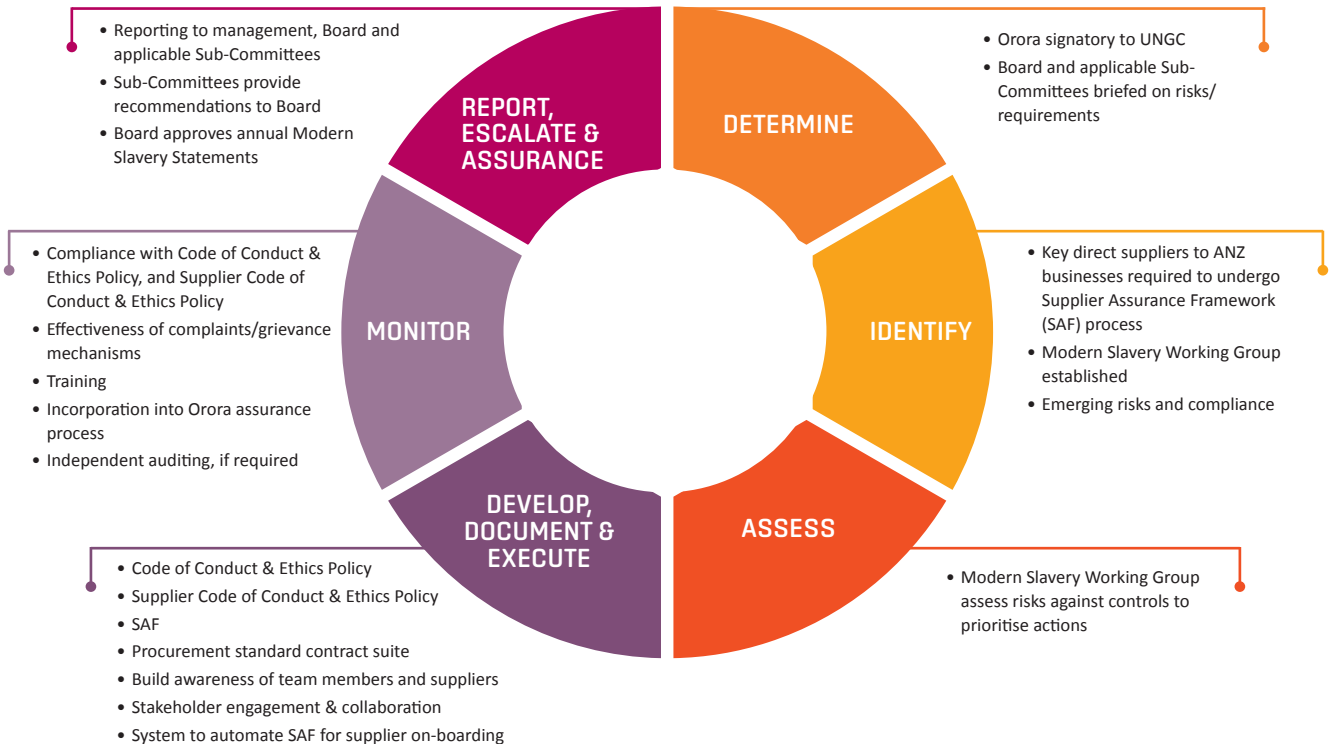
Our principal business groups, operations and supply chains during FY20 are set out Appendix 2.

# Governance of modern slavery at Orora

Risk management and governance is a priority for senior management, and is sponsored by the Orora Board

Our governance of modern slavery at Orora depicted in figure 2 and described below aligns with Orora’s enterprise risk management framework

Figure 2



## Our enterprise risk management and modern slavery governance framework

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, including:

- enhancing shareholder value through improved share price and earnings growth whilst building a sustainable business
- improving stakeholder confidence and trust
- safeguarding the company’s assets
- 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 throughout the organisation. Orora’s risk and assurance function plays a key role in reviewing the effectiveness of our

compliance and control systems. 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.

In FY20, enhancements were made to Orora’s human rights and responsible sourcing governance by the establishment of a Modern Slavery Working Group. This cross-functional 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 ensuring compliance with applicable laws and standards.

The Modern Slavery Working Group reports and provides recommendations to the Board’s Safety, Sustainability & Environment Committee and also the Audit, Risk & Compliance Committee, who both provide recommendations to the Board. The Board ultimately oversees health, safety and modern slavery risks and ensures timely disclosures and reporting in accordance with applicable laws and our risk management framework.



## Policies and procedures

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 engaging and encouraging 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 and 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 the Board and applicable Board sub-committees.

## Requirements for Suppliers to Orora

In FY20, we implemented a global Supplier Code of Conduct and Ethics Policy (**Supplier Code**) to complement our Code and set minimum standards for our suppliers and their supply chain in line with our Code 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 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 Orora’s operations and complex supply chain through a variety of circumstances

We collect and monitor internal and external information to inform and improve the definition of our risk profile, and support our human rights risk assessments. This includes:

- reviewing external indices (such as the Global Slavery Index<sup>1</sup>, The United States of America State Department’s Responsible Sourcing Tool Index<sup>2</sup>, Freedom House, Freedom In The World Index<sup>3</sup>, World Bank World Wide Governance Index<sup>4</sup> and The Fund for Peace, Fragile States Index<sup>5</sup>)

- tracking case law, emerging legislation and news alerts
- reviewing supplier self-assessments, including through the Supplier Ethical Data Exchange (SEDEX)
- Whistleblower cases.

We will continue to use a range of internal and external sources to continually improve the definition of our risk profile, which informs our due diligence approach discussed below.

## Our current risk profile

Profile	Descriptor of risk
Country risks	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. An analysis has commenced in respect of which countries we procure goods and services to our North American operations. 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.
Goods and services profile risks	<p>Our higher risk goods categories include:</p> <ul style="list-style-type: none"> <li>• Raw materials and packaged products - the global manufacturing industry commonly involves long supply chains and low-skilled, low-paid, manual work which can create risks of modern slavery. Raw materials used for manufacturing or packaged products 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 are lower than in other countries. However, there is a risk of being directly linked to modern slavery through the sourcing of raw materials, packaged products and equipment manufactured outside of Australia and used in operations.</li> <li>• Personal Protective Equipment (PPE) and other safety supplies – the increased 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.</li> </ul> <p>Our higher risk service categories include:</p> <ul style="list-style-type: none"> <li>• 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. 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.</li> <li>• 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.</li> </ul>

1 2018 Global Slavery Index, Modern Slavery: A hidden, every day problem. Available: <https://www.globallslaveryindex.org/>

2 Responsible Sourcing Tool. Available: <https://www.responsiblesourcingttool.org/>

3 Freedom House, Countries and Territories. Available: <https://freedomhouse.org/countries/freedom-world/scores>

4 World Wide Governance Indicators. Available: <http://info.worldbank.org/governance/wgi/>

5 Fragile States Index. Available: <https://fragilestatesindex.org/>

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

All of Orora’s principal business locations have a low prevalence of modern slavery country prevalence (Global Slavery Index 2018<sup>6</sup>) and a strong regulatory environment

As noted above in our current risk profile, we recognise that procurement of some goods and services (including labour hire and management facility services) outside of these jurisdictions, including from Asia and Mexico, carries inherently higher modern slavery risk (Global Slavery Index 2018<sup>6</sup>).

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

The safety, health and wellbeing of our people is paramount. We continue to invest in safety to drive improved performance across the business, and our global human resources processes and policies are designed to ensure that our employees are paid fairly and treated in compliance with applicable labour laws. We work with reputable recruitment agencies and pay the cost of all recruitment processes. Please refer to our website at [www.ororagroup.com](http://www.ororagroup.com) and our 2020 Annual Report and Corporate Governance Statement available at <https://www.ororagroup.com/investors> for further information on our safety, health and wellbeing, and diversity and inclusion activities, including our COVID-19 response.

## Sustainability

Our sustainability team has a number of risk mitigation and robust processes in place to ensure 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 becoming a signatory in 2016, we joined SEDEX (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 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 3, 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 is being implemented as a standard procurement component of on-boarding a new supplier. In the near term, we will be implementing a system to automate these checks when on-boarding suppliers, initially in Australasia. We have also integrated our Responsible Fibre Sourcing Due Diligence program within our SAF, specifically targeting our suppliers to our now divested Australasian Fibre Business of fibre products to ensure alignment with our Responsible Fibre Sourcing Policy commitments as well as legal requirements under the Australian Commonwealth Illegal Logging Prohibition Act 2012 and the United States of America’s Lacey Act of 1900.

Figure 3



6 2018 Global Slavery Index, Modern Slavery: A hidden, every day problem. Available: <https://www.globalslaveryindex.org/>

We are in the process of reviewing our risk profile and inherent risk requirements for suppliers to our ongoing core businesses, following the sale of our Australasian Fibre Business. This indicates that issues relating to fibre are now less material to Orora.

Suppliers assessed as high or medium risk based on our internal risk assessment criteria are required to join SEDEX, link with Orora and complete a further risk assessment based on the SEDEX self-assessment questionnaire, and undertake an ethical Sedex Members Ethical Trade Audit (**SMETA**), as required. Suppliers who receive a risk rating of high following a SMETA are required to successfully 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 will be removed as suppliers to our business.

As a result of Orora's SAF implementation and other internal controls, we have been able to identify no or low inherent material modern slavery and human rights risks in operational activities that are directly undertaken by our employees and prioritised Tier 1/direct suppliers to our Australasian businesses, including our divested Australasian Fibre Business. As part of the first phases of SAF suppliers representing approximately 34% of Orora's external supplier expenditure base were assessed, on the basis of risk profiling. In FY21 and beyond, we will continue to undertake a risk-based phased approach to continually assess existing suppliers, including an assessment of all direct labour hire and cleaning service providers to our Australasian business.

Whilst our Sustainability Governance Framework applies equally to our North American operations, our SAF has not yet been fully implemented into our North American procurement practices, to enable us to gain a better insight into any instances or risks of modern slavery within those operations or their complex supply chains. Implementation of our SAF into our North American operations is a priority of ours and will be reported in subsequent Modern Slavery Statements.

## 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 OV on our commitment to protecting human rights, including as a signatory to the UNGC and Orora's SAF.

We are planning on implementing further mandatory modern slavery training for employees identified as having regular touchpoints with human rights risks across the business, in addition to Group human rights and modern slavery awareness campaigns.

# Our COVID-19 response

With the emergence of the global COVID-19 pandemic, Orora was swift to implement a range of risk mitigation measures

We have focused on keeping our people safe and well, and maintaining continuity of our operations and supply to our customers as depicted in figure 4. These measures are ongoing.

Figure 4



## Safety and wellbeing of our people

To protect Orora team members who continue to perform critical duties in support of our role as an essential services provider, we introduced a number of additional safety and protective measures in compliance with, or to a higher standard than, government and health advice, including:

- requiring team members to work from home where possible and providing additional protection for those involved in critical on-site operations
- staggering shift breaks to maximise social distancing between team members
- restricting visitor access at all Orora locations unless there was a health, safety or business critical issue that required attendance
- requiring any critical site visitors to comply with specific entry and egress processes
- developing flexible work practices and enforcing social distancing.

A comprehensive safety, health and mental wellbeing campaign and support program was also implemented to encourage team members to be active in protecting themselves and their colleagues. We continue to closely monitor site and workplace activity aligned to government guidelines, including social distancing, hygiene, travel, visitation and mental wellbeing. As at the date of this statement, there have been no positive cases of COVID-19 reported in our Australasian operations, however a number of positive cases have been identified in our North

American operations. We have offered comprehensive and appropriate support to those team members in North America who tested positive and ensured the effective management of those cases to preserve the safety of team members, and reduce the risk of further transmission of COVID-19 into our sites.

Further information regarding our commitment to safety and health and our response to COVID-19 is set out in our 2020 Annual Report and Corporate Governance Statement available at <https://www.ororagroup.com/investors>.

## Engagement with our suppliers and contractors

Our suppliers and contractors are critical partners for our business. The importance of this “partnership” was heightened by the COVID-19 pandemic.

We have ensured that our site-based contractors are protected by our health and safety risk mitigation policies and procedures to keep all team members and contractors at our sites safe and our operations running.

We engaged early and regularly with our suppliers to understand the impact of COVID-19 on their businesses and provide them with any necessary support to ensure their continued operations and the continuity of their supply to our operations. We also implemented measures in Australasia to reduce their economic burden, including immediately paying all outstanding invoices on request, and reducing our payment terms, wherever necessary. We continue to work with our key suppliers and contractors to help wherever we can.

# Assessing our actions and outcomes

## Assessing actions to address modern slavery risks presents a challenge for all companies in terms of providing credible measurements of effectiveness

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

1. The Board, via the Safety, Sustainability & Environment, and the Audit, Risk & Compliance Committees, receives regular updates on the above actions and how Orora is tracking against them, together with updates on key human rights issues and developments that may impact the way we manage human rights issues in our operations and supply chain. During the development of Orora's SAF program the internal Audit, Risk and Compliance team engaged an external subject matter expert (KPMG) to review the adequacy of the program structure. It was assessed as being a pro-active and largely effective program. Suggestions for improvement have subsequently been progressively incorporated into the SAF program design.
2. The Managing Director & CEO and executive leadership team are regularly updated on the progress of the above.
3. All new suppliers to our Australasian Beverage business undergo Orora's SAF process as part of their on-boarding process, and Orora is undertaking a risk-based phased approach to continually assess existing suppliers.
4. There is ongoing communication between Orora and its suppliers on the Supplier Code and compliance with key modern slavery contractual requirements, including discussions on any issues identified, and how to address them.
5. Orora's sustainability performance is reported in the company's Annual Report and Corporate Governance Statement, which is available on Orora's website and lodged with the ASX.
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.
7. The Board, Safety, Sustainability & Environment, and Audit, Risk & Compliance Committees, continually assess best practice in this area.
8. We will continually review our actions and update our risk and governance frameworks, as appropriate, to ensure they are aligned to our human rights and sustainability commitments.

## Looking ahead

Over the 2021 financial year, our key focus areas will be to:

- Have undertaken an assessment of all new and recontracted Tier 1 labour hire and cleaning service providers suppliers to our Australasian businesses through our SAF
- Implement our SAF into our North American procurement practices, initially for new Tier 1 suppliers, to gain better insights into any instances or risks of modern slavery within those operations or their complex supply chains
- Implement further mandatory modern slavery training for employees identified as having regular touchpoints with human rights risks across the business

## Approvals

This statement was approved by the Board of Orora Limited as a reporting entity and as the parent company of the reporting entities covered by this statement on 24 February 2021.



BRIAN LOWE  
Managing Director & CEO

# Appendix 1

## 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.

The submitting entity is ASX listed, Orora Limited (ABN 55 004 275 165) as the parent company of the Orora Group. Orora Limited qualifies as a reporting entity under the Australian Commonwealth Modern Slavery Act. The following wholly owned subsidiaries of Orora Limited, Orora Packaging Australia Pty Ltd and Specialty Packaging Group Pty Ltd (**Reporting Entities**), also meet the reporting test set out in the Australian Commonwealth Modern Slavery Act. This statement is a joint statement and responds to the Commonwealth Modern Slavery Act and Californian Transparency in Supply Chains Act requirements. This statement includes Orora's Australasian Fibre Business and associated subsidiaries up and until 30 April 2020, when they were divested to Opal Packaging Australia Pty Ltd (ACN 636 682 883), a wholly owned subsidiary of Nippon Paper Inc. The associated subsidiaries of the Australasian Fibre Business do not meet the reporting testing under the Australian Commonwealth Modern Slavery Act.

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 FY20 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 (which shared common directors for the FY20 period), 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 endorsed by the Safety, Sustainability and Environment Committee of the Board before final approval by the Orora Board.



## Appendix 2

# Orora's principal business groups, operations and supply chains during FY20

Business group	Operations	Operations location(s)	Direct Supply Chain Categories
<b>Beverage</b>	<p><b>Glass</b> – leader in glass bottle manufacturing, producing over 1 billion bottles per year</p> <p><b>Cans</b> – leading provider of a range of tailored cans and can-ends, enhanced with coatings and speciality inks</p> <p><b>Closures</b> – leading provider of a range of wine and plastic cap and closures for leading beverage brands</p>	Australia and New Zealand	<ul style="list-style-type: none"> <li>Raw Materials (soda ash, sand, cullet, limestone, other chemical products supporting glass manufacturing, aluminium, inks, metal treatments and varnishes for cans and closures manufacturing)</li> <li>Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods)</li> <li>Packaged Materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs)</li> <li>Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)</li> </ul>
<b>Orora Packaging Solutions</b>	A leader in customised packaging and supply chain optimisation, serving diverse customers in the food, beverage, technology, health care, automotive, industrial and agricultural markets	United States of America, Mexico, Canada and UK/Scotland	<ul style="list-style-type: none"> <li>Raw Materials (paper, foam, plastic sheets, inks, adhesives, other chemical products supporting corrugated manufacturing)</li> <li>Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods)</li> <li>Direct Materials (Corrugated &amp; Resin custom converted products, Food Containers, Warehouse, Office, Facility Supplies &amp; Machinery) required to support customer requirements)</li> <li>Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)</li> </ul>
<b>Orora Visual</b>	A leader in point of purchase and visual communications, delivering end-to-end solutions at scale, from material production to logistics, data analytics and retail ready displays	United States of America	<ul style="list-style-type: none"> <li>Raw Materials (paper, plastic sheets, specialty or name brand print media, corrugate mounting sheets, adhesives, inks, other chemical products supporting print manufacturing)</li> <li>Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods)</li> <li>Packaged Materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs)</li> <li>Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)</li> </ul>
<b>Australasian Fibre – divested on 30 April 2020</b>	<p>Cardboard recycling and the manufacture of recycled packaging paper</p> <p>Manufacture of laminated functional paper used for special purpose boxes</p> <p>Corrugated box manufacturing and distribution of packaging materials – diversified end markets including fruit &amp; produce, beverage, meat, dry goods and industrial products</p> <p>Custom printed folding cartons, tailored bags and sacks – primarily focused on consumer products markets, particularly food, dairy and quick service restaurants</p>	Australia and New Zealand	<ul style="list-style-type: none"> <li>Raw Materials (recycled old corrugated material, paper, starch, adhesives, inks, other chemical products supporting fibre based packaging manufacturing)</li> <li>Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods)</li> <li>Packaged Materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs)</li> <li>Skilled labour and services (production and trade labour, plan maintenance contractors, skilled contract workers, other labour resources to support business operations)</li> </ul>

ORORA