



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, with the assistance of a third party, commenced a risk profile review of its North American operations to enable Orora to gain a better understanding into any instances or risks of modern slavery within those operations or their complex supply chains.

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. In Fiscal Year 2022, Orora provided more detailed modern slavery training to company employees and management who have direct responsibility for human resources, legal and procurement.

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