

# CORPORATE CODE OF CONDUCT AND ETHICS POLICY SUMMARY

Orora recognises its responsibilities as a global producer of packaging materials and services. Orora is committed to being a responsible corporate citizen and conducts its business in accordance with internationally accepted practices and procedures, as set out in Orora's Corporate Code of Conduct and Ethics Policy which is summarised below.

## Business integrity

Orora recognises the importance of honesty, integrity and fairness in conducting its business, and complies with applicable laws and regulations. Orora expects the fair, timely and accurate disclosure of information consistent with its obligations as a publicly listed company.

Directors and team members must not act such that they have a conflict of interest with the Orora Group. Financial or other inducements should not be offered, given, requested or received to influence business decisions or the award of business in Orora's favour or which has the intention that in consequence a function should be performed improperly. Caution must also be exercised by Orora team members before offering, giving, requesting or accepting gifts. No facilitation payments can be made unless the prior consent of all the persons set out in the full Corporate Code of Conduct and Ethics Policy has been obtained.

Orora supports the principles of free competition in the market and has a clear set of Competition Compliance policies, which all team members should ensure they understand.

## Labour, Health and Safety

Orora is committed to a working environment where there is mutual trust and respect. Orora enforces policies against discrimination, forced labour and child labour. Orora has created and actively maintains a harassment free work culture and provides each team member with all wage-compensation and benefits to which they are legally entitled.

Orora is committed to producing high quality products that are safe to use and to providing a safe and healthy work environment for its team members, contractors and visitors.

## Environment and Community

Orora is committed to managing its operations in an environmentally responsible manner and is dedicated to achieving sustainable environmental management through continuing research.

Orora strives to operate in a manner that encourages lasting, beneficial and interactive relationships with the communities in which it operates.

## Where to go for assistance

You should raise all decisions or actions you believe are inconsistent with the Corporate Code of Conduct and Ethics Policy with management. All instances of actual or suspected fraud should be reported in accordance with Orora's Fraud Policy.

Orora also has an Integrity Reporting Service allowing team members to report concerns anonymously (where local laws permit). Orora's Whistleblower Policy is available at Orora sites and on the Orora intranet.

## Related Policies

This should be read in conjunction with all other relevant Orora Global Policies and Procedures available on the Orora intranet, including (but not limited to):

- Corporate Code of Conduct and Ethics Policy
- Fraud Policy
- Whistleblower Policy
- Record Management Policy
- Competition Compliance

30 May 2014