

Orora Modern Slavery Statement 2024



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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 the 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

Orora Limited (Orora) is pleased to present its Modern Slavery Statement for the financial year ending 30 June 2024 (FY24). This statement is made pursuant to the Australian Commonwealth Modern Slavery Act 2018 (the Act) and has been prepared on a consolidated basis for Orora Limited (ASX: ORA) and its subsidiaries (Orora Group) although not all the entities in the Orora Group are subject to the Act.

In FY24, Orora made a significant strategic acquisition, integrating the Saverglass Group (Saverglass) into its global operations. The acquisition of Saverglass, a leading provider of high-end glass packaging for the premium spirits and wine markets, enhances Orora's global footprint and strengthens its capabilities in sustainable beverage packaging solutions. This statement reflects the expanded scope of Orora's operations, now spanning Australasia, North America, Europe, and the United Arab Emirates, with an emphasis on upholding ethical standards across all regions.

This document should be read in conjunction with Orora's FY24 Annual Report, which includes further information relating to Orora's corporate governance, financial performance, and sustainability initiatives, together with Orora's other periodic and continuous disclosure announcements on the ASX. We continue to align our efforts with the principles outlined in the Act and are committed to building upon the progress made in previous years to combat the risk of modern slavery within our operations and supply chains.

This statement provides an overview of the measures taken by Orora to ensure that its operations and supply chains have a reduced risk of modern slavery practices. It builds upon the foundations laid in previous statements and reflects Orora's ongoing commitment to ethical business practices, transparency, and continuous improvement.

Orora's approach to modern slavery is guided by its core values and commitment to sustainability, as outlined in its corporate policies and governance framework. This statement is approved by the Board of Directors of Orora Limited and has been made publicly available on the Orora website.

On the 4 September 2024, Orora announced that it had entered a binding agreement to sell Orora Packaging Solutions to Veritiv Corporation. Subject to the satisfaction of all conditions precedent, completion is expected to occur late calendar year 2024.

Consultation

This statement has been prepared with input from, and in consultation with: a. the Reporting Entities (Orora Packaging Australia Pty Ltd, Saverglass, Orora Packaging Solutions), b. Orora's Executive Leadership team (who have responsibility for the operation of the Orora Group), c. Orora's cross-functional Modern Slavery Working Group, and d. cross-functional management representatives across the Orora Group, including from the finance, procurement, risk, sustainability, human resources, legal and company secretariat teams. This statement has been approved by the Orora Limited Board and the Board of Orora Packaging Australia Pty Ltd, who have authorised Brian Lowe, Managing Director & CEO of Orora Limited to sign this statement on its behalf.

A Message from the Managing Director and CEO



I am proud to introduce Orora Limited's Modern Slavery Statement for FY24, a year marked by significant progress and expansion. The acquisition of Saverglass has enhanced our global footprint and increased our responsibility to ensure that our operations and supply chains are thoroughly assessed to mitigate the risks and occurrences of modern slavery practices.

In FY24, we took important steps to reinforce our commitment to human rights and ethical business practices. We published a comprehensive Human Rights Policy, which integrates our modern slavery efforts into a broader framework for respecting and upholding human rights across all of our operations. This policy serves as the foundation for our approach, ensuring that we systematically address potential risks and uphold the highest standards of conduct.

We have also made significant strides in educating and empowering our global team. Integrated modern slavery training was rolled out across all regions in Australasia and North America, ensuring that every team member is

equipped with the knowledge and tools to identify and respond to modern slavery risks. Additionally, we developed and disseminated modern slavery awareness materials, reinforcing our commitment to ethical practices at every level of the organisation.

One of our key achievements this year has been the implementation of a global Human Rights Due Diligence procedure. This procedure documents our internal processes and responsibilities, ensuring that we take a consistent and risk-based approach to identifying and mitigating risks. It represents a critical step in embedding human rights considerations into our day-to-day operations and decision-making processes.

In North America, we began the implementation of our Supplier Assurance Framework (SAF), which has become a cornerstone of our efforts to assess and address modern slavery risks within our supply chains. This framework will be fully integrated into our North American procurement practices within FY25, providing us with better insights and enabling us to engage more effectively with our suppliers.

I am grateful to our dedicated team members, suppliers, and partners who have contributed to these efforts. Together, we are making meaningful progress in our mission to mitigate modern slavery risks and uphold the highest ethical standards across our global operations.

This statement reflects our commitment to transparency, accountability, and continuous improvement. I encourage all our stakeholders to engage with its contents and to join us in our ongoing efforts to support the creation of a fairer, more just world.

This statement was approved by the Board of Orora Limited as a reporting entity and as the parent company of Orora Packaging Australia Pty Ltd on 5 December 2024.

Brian Lowe
Managing Director and CEO
Orora Limited

3. Summary of Key Activities in FY24

The table below summarises our FY24 progress based on the FY23 Modern Slavery Statement. For more information on upcoming actions and our strategy for addressing modern slavery risks, please refer to Section 7.

Focus Area for FY24	Progress During FY24
Implementation of Human Rights Policy	In FY24, Orora successfully introduced its Human Rights Policy, embedding modern slavery prevention into our overarching human rights framework. This policy enhances our ability to systematically assess risks and implement mitigation strategies across our global operations and supply chains.
Human Rights Due Diligence Procedure	We introduced an internal human rights due diligence procedure with the aim of documenting internal processes and responsibilities. This procedure ensures a consistent approach to identifying and addressing modern slavery risks across Orora, embedding human rights considerations into daily operations and decision-making processes.
Global Modern Slavery Training and Awareness Campaign	Orora rolled out comprehensive modern slavery training to all salaried team members globally, covering regions including ANZ and North America. Training materials were provided in English and Spanish, and by the close of FY24, 96% of eligible employees had completed the program. The campaign has strengthened our organisation-wide commitment to ethical practices, fostering heightened awareness of modern slavery risks.
Develop Training Material for the Executive Leadership Team (ELT) and Board	We developed bespoke training materials for senior executives and board members, with a focus on enhancing their understanding of modern slavery risks within Orora's operations and supply chains. These materials aim to build leadership capacity, ensuring that the company's strategic goals are aligned with our ethical commitments. Delivery of the training is scheduled for FY25.
Development of SAF for North America	The SAF was further developed and integrated into our North American procurement operations, particularly within Orora Packaging Solutions [OPS]. This framework will be fully embedded by FY25, providing a robust mechanism for identifying and addressing supply chain risks and enhancing supplier engagement across the region.
High-Risk Supplier Review in North America and Asia	We conducted a comprehensive review of 281 OPS suppliers based in Mexico and China, identifying three as high-risk due to factors such as proximity to regions with heightened forced labour risks and systemic labour rights challenges. Two suppliers completed further due diligence through the Supplier Assessment Questionnaire (SAQ), addressing corrective action plans, while engagement continues with a third supplier in China to mitigate potential risks. Further details, including findings and actions taken, can be found in Section 5.6 of this statement.
Suppliers with no public presence in China and Mexico	We prioritised 78 suppliers without a public profile for a detailed modern slavery risk assessment, narrowing this group to 54 after removing inactive vendors. In FY24, we established a process for conducting targeted due diligence on these suppliers, with 50% already contacted for further information. This ensures a deeper understanding of the potential modern slavery risks associated with these suppliers.
Optimisation of Supplier Assurance Framework (SAF) and Integration into Global Operations	Orora's Supplier Assurance Framework (SAF) underwent a comprehensive review, refining both the scoring and the questions used in supplier assessments. These updates reflect enhanced modern slavery and Environmental, Social and Governance (ESG) considerations. Continuous improvement processes were implemented and identified areas for enhancement, such as supplier reassessment protocols and clarifying decision-making authorities.

4. Orora Structure, Operations and Supply Chains

We Are One Orora

Orora is a global leader in sustainable packaging solutions listed on the Australian Securities Exchange [ASX:ORA] and is headquartered in Melbourne, Australia. Orora has operations spanning Australasia, North America, Europe, and the United Arab Emirates. Our diverse portfolio includes manufacturing and distribution sites for corrugate packaging substrates, glass, aluminium cans, closures, and visual solutions, serving a wide range of customers.

The concept of “One Orora” was established to unify our global operations under a shared vision and with shared values, ensuring consistency and excellence across all regions. This initiative became particularly significant during FY24 with the integration of Saverglass, a leader in premium glass packaging, into the Orora Group. The acquisition has strengthened our global footprint and expanded our capabilities, particularly in Europe and North America, aligning perfectly with our strategic priorities.

Throughout FY24, we continued to focus on operational excellence and sustainability. Our efforts to optimise the supply chain, particularly through the continued development and implementation of the Supplier Assurance Framework (SAF), reflect our commitment to maintaining high ethical standards across all aspects of our business. The SAF, now integrated into many parts of our OPS North American operations as well as our ANZ operations, ensures that our suppliers are assessed against our stringent criteria for modern slavery risks and broader ESG considerations.

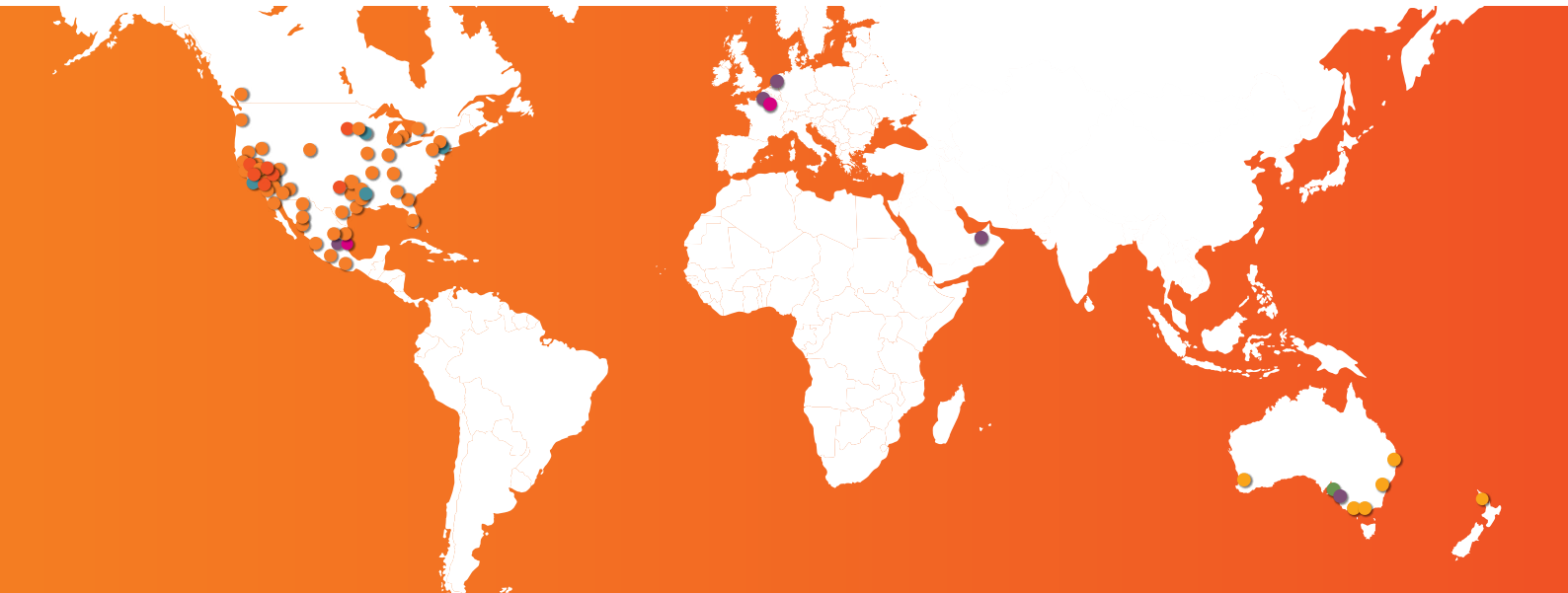
The “One Orora” philosophy is also reflected in our approach to human rights and employee engagement. The implementation of our Human Rights Policy, along with global modern slavery training and awareness campaigns, has further embedded ethical practices across our operations. This unified approach ensures that Orora operates as a cohesive, responsible entity, delivering sustainable outcomes for all stakeholders.

As we move forward, “One Orora” will continue to guide our efforts to operate as a unified group, leveraging our global diversity to drive innovation, operational excellence, and sustainability.



4.2. Our Global Operations and Workforce

Orora operates a diversified and geographically extensive network, delivering packaging solutions across key global markets. In FY24, Orora's operations expanded significantly with the acquisition of Saverglass, enhancing our presence in Europe, the UAE and North America.



- Glass Manufacturing
- Glass Decoration
- Closures Manufacturing
- Cans Manufacturing
- OPS Distribution
- OPS Manufacturing
- Orora Visual

Orora Beverage

Orora's global beverage business leads the industry in premium glass, closures and aluminium can packaging solutions. Our Global Glass network produces a spectrum of quality glass packaging, ranging from the manufacture and decoration of high-end glass bottles to standard bottles and closures. Our highly successful Cans business is made up of a network of best-in-class manufacturing sites across Australia and New Zealand.

Orora Packaging Solutions

Orora Packaging Solutions (OPS) is a leading vertically integrated provider of sustainable manufacturing, distribution and visual solutions across North America. As a market leader in custom packaging design, automation, supply chain optimisation and visual solutions for a broad range of sectors. Our focus is on leading the transition to a more sustainably packaged future.

Diversity, Equity, and Inclusion

At Orora, Diversity, Equity, and Inclusion (DE&I) is a core pillar of our culture, driving innovation and ensuring a broad, diversified workforce. We set measurable objectives in alignment with our DE&I Policy to track progress and foster inclusivity across all areas of the business.

In FY24, women represented 40% of our senior leadership team, up from 37% in FY23, demonstrating a continued focus on promoting gender diversity at all leadership levels. However, the recruitment landscape, particularly in manufacturing roles traditionally dominated by men, resulted in female new hires slightly below our 30% target, achieving 28%.

Across our business units, 23% of the workforce in our Global Beverage business consists of women, while the OPS business has a stronger representation with 33% female participation. These figures reflect our ongoing commitment to improving gender balance and creating an inclusive work environment where all individuals, regardless of background, can thrive.

Orora remains focused on furthering our DE&I goals, ensuring that diversity continues to be integral to our success as we build a workplace that represents the communities we serve.

Global Beverage

	Full time	Part time
Male	3546	42
Female	1006	62
Contractors/ temporary worker	177	

OPS

	Full time	Part time
Male	1,975	5
Female	994	3
Contractors/ temporary worker	436	

4.3. Global Procurement

Orora's supply chain is integral to delivering our diverse range of packaging solutions across global markets. In FY24, our supply chain operations were further strengthened with the acquisition of Saverglass, which expanded our sourcing capabilities and enhanced our commitment to ethical practices and achieving Orora's sustainability goals.

The graph below highlights Orora's primary areas of spend across its ANZ, Saverglass (SG), and OPS regions. Direct Materials and Packaging substrates represent the most substantial portions of Orora's total procurement. Packaged materials are those which are procured to meet our customer requirements, but not manufactured by us. Both packaged and direct materials, which include raw inputs for glass and aluminium, are often sourced internationally, and sometimes from regions with less stringent labour regulations. These international supply chains may present modern slavery risks, particularly when sourcing from countries where labour exploitation and human rights abuses are more prevalent according to the Global Slavery Index - Prevalence of Modern Slavery.

Raw Materials are those which are used in the process to manufacture our packaged products including:

- **Glass:** Raw materials are sourced globally, predominantly from Australia, New Zealand, Europe and North America, focused on increasing the use of recycled glass (cullet) to meet our sustainability targets. Further, our beneficiation plant at Gawler plays a key role in processing and utilising recycled glass.
- **Aluminium:** Predominantly sourced from various countries in the Asia-Pacific region.. Our focus remains on increasing the recycled content in aluminium cans and optimising sourcing practices to support our sustainability goals.
- **Paperboard and Corrugate:** Sourced primarily for our North American operations, focusing on sustainable forestry practices and recycled content. We continue to work with suppliers to enhance the environmental performance of our paper-based packaging.

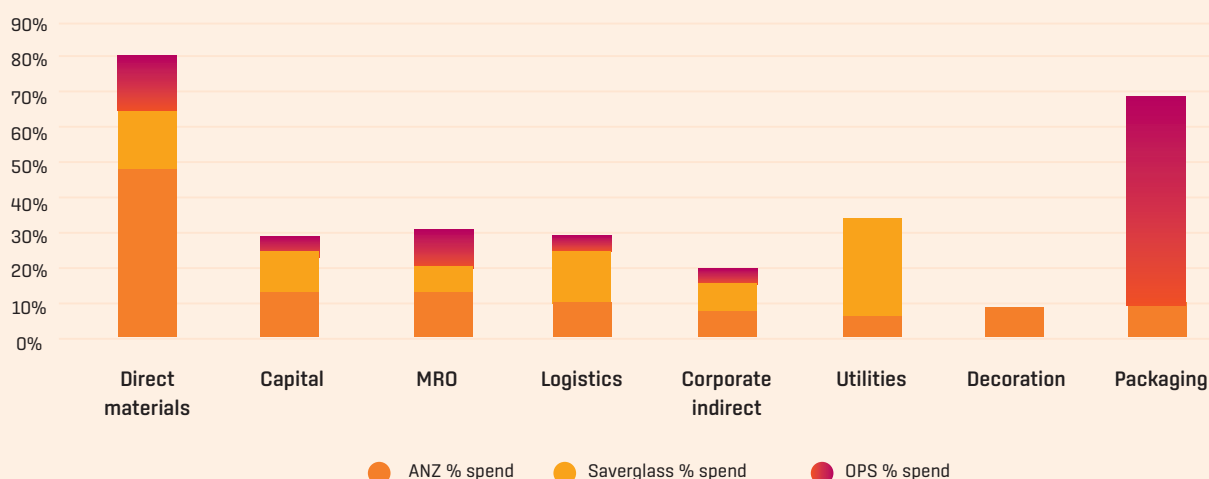
In addition to Direct and Packaged Materials, categories such as Logistics and MRO (Maintenance, Repair, and Operations) present significant modern slavery risks due to their complex, multi-tiered global supply chains. Logistics

services—covering transportation, warehousing, and freight forwarding—frequently operate in regions with weaker regulatory oversight, which heightens the likelihood of forced labour and unsafe working conditions. The inherent complexity of managing and monitoring ethical practices across various stages of logistics makes this category particularly vulnerable to labour exploitation.

Similarly, MRO, which encompasses tools, industrial equipment, and other operational supplies, often involves sourcing from low-cost manufacturing hubs. These supply chains tend to be less transparent, making it more challenging to effectively oversee labour standards and ensure fair working conditions in the countries where production occurs. This opacity increases the risk of modern slavery, as it becomes more difficult to trace operational practices back through multiple layers of suppliers.

Given these observations, Orora continues to focus on strengthening its supplier due diligence processes, especially within high-risk categories. Collaboration with suppliers and compliance with modern slavery legislation will remain a critical priority as part of our broader sustainability strategy.

Top Categories of Spend



4.4 Global Supplier Network

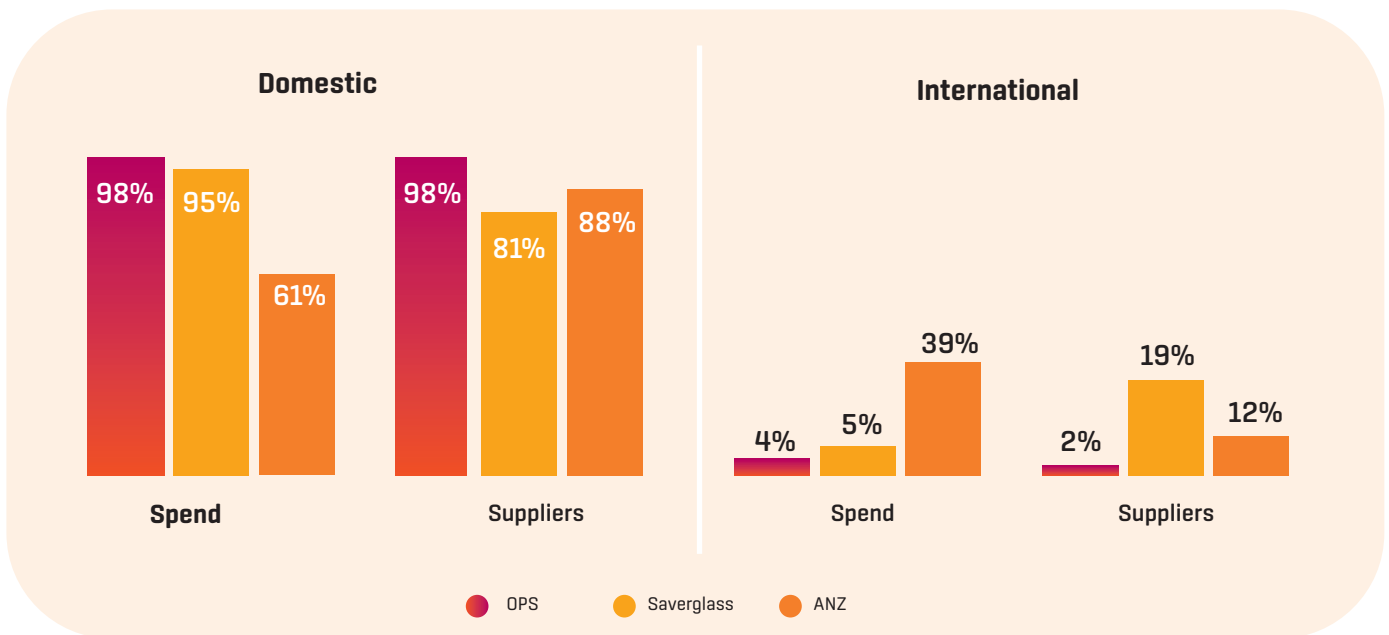
Orora's global supplier network spans key regions, including Australia, Asia, North America, Europe, and the UAE, where we work closely with suppliers to ensure compliance with the ethical standards set out in our Supplier Code of Conduct. In FY24, Orora engaged with over 9,100 suppliers worldwide for purchased goods and services, reinforcing our commitment to ethical sourcing. The percentage of domestic and international spending, as well as supplier sourcing, varies across our business regions, as demonstrated in the graph below.

In Australia and New Zealand (ANZ), 61% of total expenditure is local, and 88% of our suppliers are sourced within the region. This strong focus on local sourcing helps maintain supply chain resilience and supports the local economy. Similarly, in North America, 96% of Orora Packaging Solutions (OPS) supply chain expenditure is domestic, closely aligning with the 98% of domestic suppliers. The acquisition of Saverglass further expanded our global footprint, particularly into Western Europe, North America, and the Middle East/South West Asia, where 95% of supply chain expenditure and 91% of suppliers are considered domestic.

Our supplier relationships go beyond ethical compliance, with a strong emphasis on sustainability. This includes efforts to reduce carbon emissions and manage climate-related risks, while also supporting local communities by prioritising domestic suppliers. By doing so, we reduce the environmental impact of transportation, enhance supply chain continuity, and contribute positively to regional economies.

Sustainable sourcing practices are central to Orora's efforts to mitigate modern slavery risks, while also aligning with our broader sustainability objectives. By maintaining a high level of visibility and control over both domestic and international suppliers, we aim to ensure that ethical standards are consistently upheld across our global operations. Further, our commitment to a circular economy is reflected in our sourcing decisions, especially in the increased use of recycled materials in glass, aluminium, and paperboard production.

Domestic vs International suppliers and spend



5. Identifying Modern Slavery Risks and Our Due Diligence Approach

5.1 Our Approach and Commitment

The protection of human rights remains a central pillar of Orora's sustainability efforts. In FY24, we continued to evolve our strategy to better align with both global standards and the increasing expectations of our stakeholders. Our commitment to upholding human rights extends through every facet of our operations, ensuring that both our workforce and supply chains are protected from the risks of modern slavery and other human rights violations.

Orora's approach is guided by its three-pillar sustainability strategy: Circular Economy, Climate Change, and Community, which is at the heart of our "Promise to the Future". These pillars reflect our commitment to reducing our environmental footprint and driving meaningful social change across the regions where we operate.

As signatories of the United Nations Global Compact (UNGC), we take our responsibility seriously, particularly when it comes to the well-being of people within our operations and those impacted by our supply chains.

In FY24, we've built on this foundation by intensifying our focus on supply chain due diligence, especially in areas with higher risks of human rights abuses. We continue to review and improve our supplier screening and engagement processes to ensure ethical sourcing and compliance with both legal and ethical standards. In alignment with our 'Community pillar', we aim to create long-lasting, positive impacts on local communities, by prioritising suppliers who support ethical labour practices as well as having a strong ESG focus.

While modern slavery has not been identified within our direct operations or supply chain to date, we remain diligent in monitoring, assessing, and addressing potential risks. We continuously enhance our grievance mechanisms, allowing for transparent reporting and resolution of any human rights concerns that may arise.

For detailed insights into our sustainability efforts, we encourage stakeholders to refer to our Annual Report (which includes our Corporate Governance Statement) and visit our sustainability page at www.ororagroup.com/sustainability.

Our Promise to the Future



Circular Economy

- Recycled content
- Recyclable packaging
- Recyclable substrates
- Certification



Climate Change

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



Community

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

5.2 Our Human Rights Due Diligence Framework

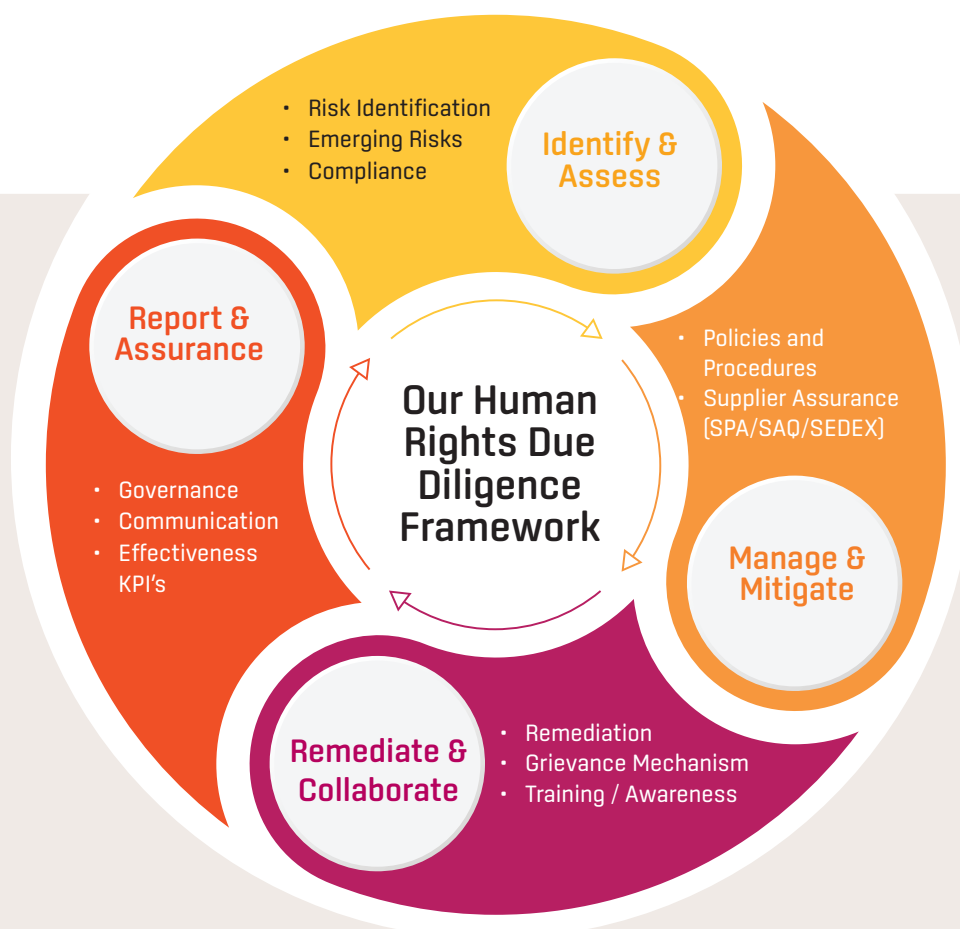
At Orora, our Human Rights Due Diligence Framework (Framework) plays a critical role in safeguarding human rights across our operations and supply chains. Enhanced in FY24, this Framework is integral to our efforts to systematically identify, assess, and address risks related to modern slavery and broader human rights concerns throughout our business.

Aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and in accordance with Australian Government guidance¹, our Framework follows a risk-based approach to evaluating both current and potential human rights impacts. The process is designed to ensure that risks are proactively identified and effectively mitigated, reinforcing our commitment to ethical and responsible operations.

The Framework comprises four key elements:

- 1. Identify and Assess:** We continuously identify and assess any actual or potential adverse human rights impacts that Orora may cause, contribute to, or be directly linked to. This includes an ongoing evaluation of supply chains in regions with a heightened risk of modern slavery.
- 2. Manage and Mitigate:** Once risks are identified, we implement targeted measures to manage and mitigate these impacts. This includes embedding human rights considerations into our core business processes and working closely with suppliers to ensure compliance with our standards.
- 3. Remediate and Collaborate:** Where issues are identified, we ensure that appropriate remedial actions are taken. Our collaboration with stakeholders—both internal and
- 4. Report, Escalate, and Assure:** We track the effectiveness of our efforts to manage human rights risks and communicate regularly with stakeholders. Our reporting ensures transparency, providing clear insights into the actions taken and the outcomes achieved.

Orora's Framework is not static. It is a dynamic tool that evolves as new risks emerge and global standards develop. We remain committed to regularly reviewing and updating our processes to ensure they reflect global best practices and remain effective in addressing modern slavery risks. Through transparent reporting, we provide stakeholders with a comprehensive view of our due diligence activities and their impact.



¹ :https://modernslaveryregister.gov.au/resources/Commonwealth_Modern_Slavery_Act_Guidance_for_Reporting_Entities.pdf

5.3 Our Governance

Board Oversight

The Orora Board of Directors holds ultimate responsibility for overseeing the company's human rights and modern slavery commitments. The Board ensures that the development and implementation of Orora's Human Rights Due Diligence Framework aligns with our strategic objectives and legal obligations, maintaining a focus on ethical conduct and risk management.

Safety, Sustainability, and Environment Committee (SSEC)

The SSEC, a sub-committee of the Board, plays a crucial role in monitoring and reviewing Orora's modern slavery mitigation initiatives. This committee ensures that Orora's policies and practices reflect our commitment to sustainability and responsible business conduct. The SSEC regularly reviews the effectiveness of our due diligence processes and offers guidance on areas for improvement.

Executive Leadership Team (ELT)

The Executive Leadership Team, led by Orora's Managing Director and Chief Executive Officer, oversees the operational implementation of Orora's human rights and modern slavery

strategies. The ELT ensures that our commitments are translated into actionable plans across all business units, embedding modern slavery risk management into everyday operations.

Human Resources Committee

The Human Resources Committee provides assistance and advice to the Board on the Company's people, culture and remuneration policies and practices as well as the Company's involvement in the communities in which it operates.

Audit, Risk, and Compliance Committee

The Audit, Risk, and Compliance Committee plays a vital role in Orora's assurance function. Orora's internal risk and assurance function critically evaluates the efficiency of our compliance and control systems, including our approach to risk management. The findings from these assessments are reported to the Board's Audit, Risk, and Compliance Committee, ensuring that necessary actions are taken to reinforce our robust control framework. This process enhances the effectiveness of our modern slavery risk management and ensures continuous improvement in our governance structures.

Cross-Functional Working Groups

Orora has established cross-functional working groups that bring together expertise from procurement, legal, sustainability, and risk management. These groups collaborate to identify, assess, and address modern slavery risks across the business. They also play a key role in developing and refining our Supplier Assurance Framework (SAF) and other due diligence tools, ensuring a coordinated approach across the organisation.

Orora's governance framework is dynamic and evolving. We regularly review and update our governance practices to ensure they remain effective in addressing modern slavery risks, allowing us to stay ahead of emerging challenges and maintain our position as a leader in ethical business conduct.



5.3.1 Our Policies and Processes

Orora operates under a comprehensive framework of governance documents that clearly define expectations for both our team members and suppliers. Our commitment to addressing modern slavery risks within our operations and supply chains is demonstrated through the continuous enhancement of our policies and procedures.

Human Rights Policy¹

Introduced in FY24, this Policy formalises Orora's commitment to upholding human rights. It outlines our approach to identifying and mitigating risks, including from modern slavery, and serves as the foundation of our Human Rights Due Diligence efforts, guiding our operational practices to ensure ethical conduct across the business.

Code of Conduct and Ethics Policy

Orora's Code of Conduct reinforces our dedication to operating with integrity and transparency. It sets clear ethical standards for all employees and business representatives, underscoring our commitment to human rights. The Code also highlights our commitment to collaborating with third-party partners who share our ethical values, ensuring alignment throughout the supply chain.

Working with Respect Policy

This policy reinforces our dedication to fostering a respectful and inclusive workplace, free from harassment, discrimination, and victimisation. It upholds the principles of equality and dignity, promoting a culture where diversity is embraced, and all employees are treated with professionalism and respect.

Diversity, Equity and Inclusion Policy

At Orora, we value diversity as a driver of innovation and success. Diversity, Equity and Inclusion Policy sets out the principles for building a workplace that celebrates varied perspectives, fostering an environment of equity and inclusion. We recognise that our success is tied to attracting and retaining talented individuals with unique experiences and ideas.

Integrity Reporting Service (Whistleblower Policy)

Orora is committed to maintaining an ethical work environment where Team members feel empowered to report concerns. Our Whistleblower Policy provides clear procedures for reporting unlawful or unethical behaviour, including modern slavery. The policy also outlines protective measures for individuals who raise concerns, ensuring confidentiality and safety from retaliation.

Supplier Code of Conduct

Orora's Supplier Code of Conduct sets out our expectations for suppliers, particularly regarding modern slavery and broader human rights, as well as social, environmental, and governance issues. Suppliers are required to avoid practices that could lead to modern slavery, ensuring they operate in a manner that aligns with Orora's high ethical standards.

Responsible Sourcing

We are committed to sourcing products and services that are traceable, socially responsible, and environmentally sustainable. Tools such as SEDEX and Forest Stewardship/Chain of Custody certifications are central to our responsible sourcing practices. In FY24, we further strengthened our Supplier Assurance Framework (SAF) by incorporating more detailed assessments of modern slavery risks, ensuring that all suppliers adhere to Orora's rigorous ethical requirements.

1: https://www.ororagroup.com/ckeditor_assets/attachments/294/Human_Rights_Policy_-_2024.pdf

5.4 UN Guiding Principles on Business and Human Rights (UNGPs)

Orora's approach to managing modern slavery risks is closely aligned with the UN Guiding Principles on Business and Human Rights (UNGPs). This globally accepted framework helps guide our efforts in preventing, addressing, and remediating modern slavery-related human rights impacts across our operations and supply chains.

In accordance with the UNGPs, Orora evaluates modern slavery risks through three key relationships: cause, contribute, and directly linked. This framework ensures that we identify and mitigate risks at all levels of our involvement.

Risk Category	Description	Mitigation Measures
Cause	Orora is proactive in ensuring that our own operations do not directly cause modern slavery. This means that our manufacturing processes are designed to avoid any situation where team members might be subjected to forced labour or coercive practices. For example, if Orora identifies that any facility is not adhering to fair employment practices—such as withholding wages or imposing excessive working hours—this would indicate a precursor to modern slavery. Research indicates that rigorous oversight of labour practices within facilities is crucial for preventing these abuses.	To mitigate the risk of modern slavery within our own operations, Orora has implemented comprehensive recruitment procedures that include thorough background checks and training on ethical employment practices. Regular reviews are conducted to monitor compliance with labour standards and ensure that all team members are working voluntarily and under fair conditions. This is supplemented by regular training programs that educate team members about their rights and the importance of a safe working environment.
Contribute	Orora acknowledges that our actions or inactions could inadvertently contribute to modern slavery within our supply chain. For example, if we exert pressure on a supplier to drastically reduce costs, they might respond by cutting corners, which can lead to the exploitation of workers. This can manifest in various ways, including forced or underpaid labour, particularly in industries that are sensitive to cost fluctuations.	To prevent this scenario, Orora employs a thorough supplier assessment process, which evaluates the ethical practices of potential partners before engagement. We implement fair pricing models that allow suppliers to maintain ethical labour practices, ensuring that cost reductions do not compromise worker rights. Furthermore, Orora engages in continuous dialogue with suppliers about their labour practices and encourages transparency to foster a collaborative approach in tackling these risks.
Directly Linked	Orora could be connected to modern slavery through our extended supply chains. This includes scenarios where a third-tier supplier of packaging materials sources raw inputs from companies involved in forced labour practices. Even if Orora is not directly involved in these practices, our brand could be tarnished, and our ethical commitments undermined if these abuses are discovered.	To address this risk, Orora employs its Supplier Assurance Framework (SAF), which includes comprehensive evaluations of high-risk suppliers. This framework enables us to assess compliance against our ethical standards. By requiring suppliers to disclose their own supply chain practices and taking steps to ensure they adhere to our Supplier Code of Conduct, we aim to reduce potential risks of modern slavery throughout the supply chain.

The UNGPs are integral to our broader approach to due diligence, remediation, and continuous improvement. In FY24, Orora enhanced its due diligence processes by integrating more rigorous assessments of modern slavery and broader Environmental, Social, and Governance (ESG) risks into our Supplier Assurance Framework. These enhancements ensure that we maintain robust oversight of suppliers and take action wherever risks of modern slavery are identified.

By consistently reviewing and refining our processes, Orora remains committed to leading ethical business practices that align with the UNGPs and the global fight against modern slavery.

5.5 Defining Our Risk Profile

5.5.1 Data Sources and Risk Assessment

Orora's approach to identifying and managing modern slavery risks is dynamic, leveraging a combination of internal data and external benchmarks to create a comprehensive and evolving risk profile. In FY24, we continued to refine this profile to ensure we effectively address potential risks across our global operations and supply chains.

To maintain an informed and proactive stance on modern slavery, Orora utilises a diverse range of data sources that allow us to continuously assess and update our risk profile. Key data inputs include:

- **External Indices:** Orora utilises global benchmarks such as the Global Slavery Index, Freedom House's Freedom in the World Index, and the World Bank's Worldwide Governance Indicators. These tools help us evaluate the broader human rights and governance landscape in the regions where we operate, allowing us to better understand and anticipate risks in countries with heightened vulnerability to modern slavery.
- **Supplier Expenditure Analysis:** While high spend with a supplier does not directly indicate modern slavery risk, we consider supplier expenditure a key factor in shaping our response strategies. With high-spend suppliers, Orora can exert greater influence, fostering deeper collaboration and engagement to ensure these suppliers comply with our ethical standards and address any identified modern slavery risks. This focus allows us to prioritise areas where our influence can have the most impact.

Ongoing Monitoring and Analysis

Our risk profile is not static. We continuously monitor emerging developments in modern slavery and human rights risks to ensure we remain responsive to changing conditions. This includes:

- **Legislative and Regulatory Updates:** Orora tracks changes in global legislation, case law, and industry standards related to modern slavery. By staying informed about new regulations and compliance requirements, we ensure our policies and practices remain relevant and effective.
- **Supplier Self-Assessments:** Tools such as our Supplier Assessment Questionnaire (SAQ), combined with third-party platforms like SEDEX and Ecovadis, allow us to gather detailed insights from our suppliers. These self-assessments help identify potential modern slavery risks and ensure alignment with Orora's Supplier Code of Conduct.
- **Integrity Reporting Service:** Our Integrity Reporting Service remains a crucial tool in identifying potential human rights abuses. Any reports made through the program are carefully reviewed and investigated, providing valuable insights into risks within our operations and supply chains.

Tier 2 and Beyond Suppliers: Given the complexity of our supply chain, our ability to scrutinise suppliers beyond Tier 1 is less comprehensive. Recognising this gap, we are committed to deepening our due diligence efforts concerning Tier 2 suppliers. This includes leveraging our Supplier Assurance Framework (SAF) to extend transparency and awareness of modern slavery risks further down the supply chain. In FY25, we will continue to enhance our efforts to improve visibility and influence beyond our immediate suppliers.

5.5.2 Potential Modern Slavery Risks

Orora's approach to identifying and managing modern slavery risks is critical to safeguarding the integrity of its global operations and supply chains. By assessing geographical, sector-specific, supplier, and operational risks, we maintain a proactive stance to mitigating the risk of modern slavery within our business. In FY24, we enhanced our risk assessment processes, integrating the latest industry insights and best practices to address these risks.

Risk Area	Key Risk Factors	Our Relationship to the Risk
Geographical Risks	High-risk regions with weak regulatory environments, high corruption, and socio-economic instability, such as Asia and Central America.	Orora's operations and supply chains span countries with varying levels of modern slavery risks. By conducting regular assessments using external indices (Global Slavery Index, Freedom House), we continuously update our understanding of the risks associated within high-risk regions and implement appropriate mitigation strategies.
Sector-Specific Risks	Vulnerable sectors such as raw material sourcing, manufacturing, and logistics, where reliance on low-wage, low-skill labour is common.	In sectors such as logistics and raw material sourcing, modern slavery risks are more pronounced due to the complexity of multi-tiered supply chains. Orora has updated its Supplier Assurance Framework (SAF) to capture these sector-specific risks and ensure due diligence is targeted at the most vulnerable categories.
Supplier Risks	Suppliers with complex supply chains, poor labour practices, or lack of adherence to international standards.	Through our Supplier Assessment Questionnaire (SAQ) and Supplier Pre-Assessment (SPA) processes, Orora identifies and evaluates suppliers that pose a heightened risk of modern slavery. By engaging in collaboration and conducting third-party audits where necessary, we work to mitigate supplier-related risks.
Operational Risks	Risks related to Orora's own operations, including labour practices, procurement processes, and third-party relationships.	Orora's operations are scrutinised for modern slavery risks, with strict internal controls in place to ensure compliance with ethical standards. This includes evaluating procurement processes and monitoring high-risk labour practices that could lead to modern slavery exposure in our direct operations.

Through this multi-faceted approach, Orora ensures that modern slavery risks are identified and addressed across the entire supply chain and operations, fostering a more ethical and sustainable business model. The combination of geographical, sector-specific, and supplier risk assessments allows for targeted interventions and continuous improvements in our risk mitigation efforts. Furthermore, Orora remains vigilant by continually monitoring external reports, case law, and whistleblower reports to identify emerging risks. We adjust our risk profile and implement targeted mitigation strategies based on this ongoing analysis, ensuring that our processes stay aligned with evolving modern slavery threats.

5.6. Due Diligence – Actions Taken to Assess and Address Modern Slavery Risks

Orora remains committed to identifying and addressing modern slavery risks throughout its global operations and supply chains. In FY24, we continued to enhance and refine our due diligence processes to ensure a proactive approach to mitigating these risks. Our due diligence activities were not only shaped by past efforts but also informed by evolving risks, global industry standards, and our firm commitment to ethical sourcing.

Supplier Risk Assessment and Engagement

During FY24, Orora continued its risk assessment and due diligence processes to address the heightened potential for human rights abuses and modern slavery in its global supply chain. In particular, Orora focused on suppliers in high-risk regions, including China and Mexico—countries where risks related to forced labour, human rights abuses, and exploitation are well-documented. Building on the comprehensive supplier risk evaluation efforts initiated in FY22 of over 6000 suppliers to the OPS business, Orora undertook detailed assessments of 281 suppliers identified for closer examination in FY23, utilising a methodology aligned with the UNGPs.

China and Mexico remain high-priority regions for due diligence based on a combination of factors including regulatory weaknesses, documented incidents of forced labour, and socio-political instability, that heighten the risks of exploitation in supply chains. In China, for instance, modern slavery risks have been spotlighted in regions such as Xinjiang and near the North Korean border, where forced labour, particularly among vulnerable populations such as Uyghurs and North Korean defectors, has been heavily documented. The Global Slavery Index¹ ranks China as a country with significant modern slavery risks, and companies with suppliers in the region are increasingly held to stricter scrutiny due to these issues. Mexico, too, presents concerns, particularly in sectors linked to agriculture, manufacturing, and informal labour, where labour rights violations and human trafficking are prevalent.

Given these factors, Orora engaged third-party consultants to conduct a detailed review of these suppliers

located in high risk regions. The consultants utilised data from the Global Slavery Index and country-specific assessments to evaluate the likelihood of forced labour and human rights violations across various industries. Of the 281 suppliers reviewed, 18 were categorised as having high overall risk levels, requiring closer scrutiny and further action. Among these suppliers, three—two located in China and one in Mexico—were identified as requiring additional due diligence due to their higher exposure to modern slavery risks.

Mexico

Orora identified a supplier in Mexico linked to regions with documented land rights and human rights abuses. In parts of southern Mexico, for example, indigenous communities often face displacement due to land-grabbing and exploitative labour practices, particularly in sectors such as agriculture and manufacturing. The supplier in question was transparent in acknowledging these risks and provided a detailed sustainability report that outlined steps being taken to address the underlying issues, including community engagement and an on-going commitment to respecting land rights. Orora's ongoing engagement with this supplier includes monitoring of their progress and collaboration to ensure that the identified risks are mitigated.

China

The two suppliers flagged in China were operating near the North Korean border, a region notorious for forced labour. Forced labour in China has been an international focus, particularly in industries such as textiles, mining, and manufacturing, which often involve complex supply chains that may include unregulated or poorly monitored subcontractors. One of the Chinese suppliers demonstrated a strong commitment to transparency, providing Orora with the results of two social audits, including a Sedex Members Ethical Trade Audit (SMETA) and a Business Social Compliance Initiatives (BSCI) audit—both globally recognised assessment tools used to evaluate labour conditions, business ethics, and environmental management in supply chains.

Through the SEDEX and BSCI audits, this supplier was found to have certain labour rights concerns, not related to modern

slavery, for which they have developed time-bound corrective action plans (CAPs). These CAPs are reviewed by Orora team members within Procurement and Sustainability to ensure improvements are being made in line with agreed-upon timelines. This collaborative approach helps ensure that the supplier is taking necessary steps to improve their labour conditions while also meeting Orora's ethical sourcing requirements.

The second Chinese supplier was initially less forthcoming but has since engaged in discussions with Orora regarding potential risks within their supply chain. Orora has implemented a step-by-step process to understand where specific risks may lie, particularly in terms of their sourcing of raw materials and subcontractor practices. The supplier's compliance with Orora's Supplier Code of Conduct is continuously monitored, and further assessments may be conducted to ensure full alignment with Orora's modern slavery prevention efforts.

Expanded Due Diligence and Continuous Monitoring

As part of our expanded due diligence efforts, Orora has also integrated broader ESG (Environmental, Social, and Governance) criteria into its supplier assessments. This allows Orora to address human rights risks within a larger framework of sustainability, ensuring that the environmental and social impacts of its suppliers' operations are also taken into account. In regions like China and Mexico, where environmental degradation and human exploitation often intersect, this holistic approach enables Orora to identify broader patterns of risk that may not be apparent through a solely labour-focused lens.

In line with our commitment to transparency and continuous improvement, Orora regularly reviews its due diligence processes, ensuring they remain aligned with global best practices and emerging risks. Moving forward, Orora will continue to engage closely with high-risk suppliers, ensuring that modern slavery risks are systematically addressed, while also contributing to broader goals of sustainability and ethical business practices across its supply chains.

1 <https://www.walkfree.org/global-slavery-index/findings/spotlights/examining-state-imposed-forced-labour/>

5.7 Training, Awareness, and Capacity Building

At Orora, we are committed to equipping our team members, suppliers, and stakeholders with the knowledge and resources needed to identify, prevent, and address modern slavery risks across our operations and supply chains. In FY24, we took steps to enhance our training, awareness, and capacity-building initiatives globally.

Employee Training

In FY24, Orora launched comprehensive modern slavery training programs across all regions. This mandatory training for all salaried employees covers essential topics such as identifying modern slavery risks, awareness and understanding Orora's policies, and the procedures for reporting any concerns. The training is updated regularly to reflect the latest industry developments and global best practices in human rights and modern slavery.

To further strengthen leadership engagement, Orora developed specialised training for the Executive Leadership Team (ELT) and the Board, providing deeper insights into strategic modern slavery risk management. This tailored program will be rolled out in

FY25, ensuring our senior leaders are well-equipped to drive the company's efforts in mitigating modern slavery risks.

Supplier Engagement

Within the OPS business, procurement teams hold strategic business review meetings with suppliers to discuss key business matters, including Orora's obligations under modern slavery legislation. These meetings provide clear guidance on the actions suppliers must take to align with Orora's ethical standards. In FY24, 180 key suppliers were engaged in these discussions, emphasising the importance of ethical supply chain management, and fostering collaboration to achieve shared goals.

Awareness Campaigns

Orora also launched a series of modern slavery awareness campaigns aimed at reinforcing ethical practices across the organisation. These initiatives included distributing awareness materials such as posters and digital content across our offices and facilities, ensuring that employees at all levels remain engaged with Orora's commitment to addressing modern slavery. These campaigns were

designed to create ongoing engagement of the issue, helping to build a culture of awareness, vigilance and responsibility across the business.

Continuous Improvement

Orora remains dedicated to continuously improving our training and awareness programs. We actively seek feedback from participants to refine and enhance the content and delivery of these initiatives. By doing so, we ensure our programs remain effective, up-to-date, and relevant, allowing us to consistently strengthen our capacity to prevent and mitigate modern slavery risks throughout our operations and supply chains.

5.8 Grievance and Remediation

Orora is dedicated to ensuring that if modern slavery is identified within our operations or supply chains, we respond swiftly and effectively to remediate the situation. Although no instances of modern slavery have been encountered to date, we are well-prepared to act should such issues arise.

Grievance Mechanisms

Orora has established robust grievance mechanisms designed to empower team members, suppliers, and stakeholders to report concerns regarding unethical practices, including modern slavery. These mechanisms, which are easily accessible, are supported by Orora's Whistleblower Policy, ensuring that all reports are handled confidentially and without fear of retaliation.

- **Reporting Integrity Service:** Our Reporting Integrity Service encourages employees and third parties to report unethical or illegal activities, including potential cases of modern slavery. To protect anonymity, reports can be submitted through an independent, third-party integrity reporting service. This ensures that all concerns are managed with strict confidentiality and are addressed thoroughly.
- **Investigative Procedures:** Once a grievance is reported, Orora initiates a thorough investigation to examine the issue. The findings are reported to the appropriate Board sub-committee, ensuring transparency and accountability in handling these matters.

Remediation Processes

In the event that Orora is found to have caused, contributed to, or been directly linked to modern slavery, we are committed to taking immediate action. Our comprehensive remediation plan includes the following key elements:

- **Collaboration with Affected Parties:** Orora will work closely with affected individuals and organisations to understand the root causes of the issue and implement corrective actions. This may involve engaging suppliers to ensure corrective measures are taken or providing direct support to victims of modern slavery to address the harm they have experienced.
- **Supply Chain Influence:** Leveraging our relationships with suppliers, Orora will work to drive meaningful change within our supply chain, especially with high-risk suppliers. Our goal is to ensure that any identified risks are mitigated promptly and that ethical standards are upheld throughout our supply chain network.

Orora is committed to continuously refining and enhancing our grievance and remediation processes. We regularly review and update our policies to ensure they remain effective in addressing modern slavery risks and provide support to those who may be affected. Our ongoing commitment ensures that we are ready to respond to any challenges, safeguarding human rights across our global operations and supply chains.

6. Assessing the Effectiveness of Our Actions

Orora is dedicated to the continuous evaluation of the effectiveness of its initiatives to combat modern slavery. Our assessment is measured against the key components of our Human Rights Due Diligence (HRDD) Framework, enabling us to track progress and ensure that our efforts are both effective and aligned with international standards.

Effectiveness Measurement	Key Outcomes – building on previous actions [FY24]
Identify & Assess	<p>We systematically assess the effectiveness of our risk identification efforts by monitoring the emergence of new risks and ensuring suppliers' adherence to our Orora Code and Supplier Code of Conduct. This includes conducting regular supplier evaluations and using external indices to assess high-risk regions.</p> <p>In FY24, we undertook enhanced due diligence with three high-risk suppliers located in China and Mexico, focusing on their involvement within the North American OPS business. This process provided greater visibility into potential forced labour risks, leading to more strategic engagement with these suppliers to reduce vulnerabilities in their operations.</p>
Manage & Mitigate	<p>Orora's HRDD Framework is continuously reviewed to confirm that our policies and mitigation strategies are effective in addressing identified risks. This involves the regular assessment of our supplier assurance processes and their impact on risk reduction.</p> <p>In FY24, Orora onboarded and assessed 232 suppliers within our Australasian business and 150 suppliers in our OPS business through our Supplier Assurance Framework (SAF). Additionally, we implemented further due diligence for high-risk suppliers as needed. Orora also introduced its first Human Rights Policy and Due Diligence Procedure, further strengthening our ability to manage and mitigate modern slavery risks. During the same period, 180 Management Review meetings were conducted within OPS to ensure close engagement with suppliers.</p>
Remediate & Collaborate	<p>We evaluate the effectiveness of our remediation and collaboration efforts by reviewing any grievances and ensuring swift resolution of any modern slavery-related issues.</p> <p>In FY24, Orora encountered no grievances related to modern slavery. We proactively deployed global training materials to enhance awareness across our entire organisation, and developed bespoke training materials for the ELT and the Board, to elevate the organisation's understanding of modern slavery risks and improve response protocols.</p>
Report, Escalate & Assurance	<p>The effectiveness of our communication, reporting, and assurance processes is measured through regular updates to the Board and the ELT.</p> <p>In FY24, Orora's Board, along with the Safety, Sustainability & Environment Committee and the Audit, Risk & Compliance Committee, received updates on progress made towards modern slavery risk management. These updates ensured the ongoing evaluation of our mitigation tools and processes, helping to maintain the efficacy of our overall risk management approach.</p>

Orora remains committed to refining and adapting our approach to modern slavery risk management. Through continuous feedback, supplier engagement, and thorough monitoring, we ensure that our actions are impactful and adaptive, driving measurable improvements in addressing modern slavery risks across global operations and supply chains.

7. Next Steps

Orora's commitment to addressing modern slavery is an ongoing journey, and as we enter FY25, we have outlined several key focus areas and strategic initiatives to further strengthen our due diligence processes and mitigate modern slavery risks within our operations and supply chains.

Planned Actions for FY25:

Review and Update Supplier Code of Conduct	A priority for FY25 is the review and update of our Supplier Code of Conduct to ensure it remains aligned with evolving global standards on modern slavery, human rights, foreign bribery, and sustainability. We will refine the language around supplier expectations, particularly for high-risk regions, and integrate insights gained from our recent due diligence activities. This update will reinforce compliance mechanisms, ensuring that suppliers across all regions fully align with Orora's ethical sourcing commitments.
Deliver Training to ELT and Board	In FY25, Orora will provide comprehensive training on modern slavery and human rights to the Executive Leadership Team (ELT) and the Board. This training is designed to increase awareness at the highest leadership levels, equipping decision-makers with the knowledge and tools to identify and mitigate modern slavery risks. This targeted training will reinforce Orora's culture of ethical governance and support senior leaders to continue to drive human rights awareness and measurable change.
Expand Orora's Training and Awareness Initiatives globally	As part of our commitment to fostering a unified approach to human rights and modern slavery prevention, Orora will prioritise the rollout of tailored training and awareness materials across our global business. These initiatives aim to ensure that all teams—spanning factory workers, operational staff, and management—are educated on modern slavery risks and equipped to take appropriate action. Training and awareness material will be made available in the local languages, in particular, French, Spanish and English.
Conduct Human Rights Risk Assessment on Global Glass Tier-1 Suppliers	Orora will carry out a comprehensive human rights risk assessment of Tier 1 suppliers to the global glass business. This assessment will identify potential risks within the supply chain, with a focus on high-risk sectors and regions, and highlight areas of concern related to modern slavery or human rights violations. The initiative will ensure that the global glass network adheres to Orora's high ethical standards, reinforcing compliance across the board.
On-Site Human Rights Due Diligence audit in a high-risk region.	In FY25, Orora will conduct an on-site human rights due diligence audit at our glass manufacturing plant located within in a high-risk region (UAE), building on the strong foundation of actions previously undertaken. This assessment aims to further strengthen compliance with international human rights standards, focusing on labour conditions, worker treatment, and ethical practices. The audit reflects Orora's proactive commitment to ensuring ethical operations across all locations, particularly in regions where heightened risks, such as reliance on migrant labour, require careful oversight.
Gap Assessment and Integration of Orora's HRDD into the Global Glass Business	Orora will work with the wider global glass business to conduct a gap assessment of its Human Rights due Diligence (HRDD) practices, comparing them to Orora's existing framework. The goal is to develop and commence implementing an action plan that addresses any gaps, fully integrating Orora's HRDD framework into our global business.

Appendices

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

This table sets out how Orora’s Modern Slavery Statement for FY24 addresses the mandatory reporting criteria outlined in the Australian Commonwealth Modern Slavery Act 2018

Mandatory reporting requirements	Reference in this Statement
Identify the reporting entity	Section 1 and Appendix 2
Describe the reporting entity’s structure, operations, and supply chains	Section 4: Orora’s Global Structure and Supply Chain - This section includes details on Orora’s acquisition of Saverglass, expanding the group’s footprint in Australasia, North America, Europe, and the UAE.
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	Section 3 and Section 5: Risks of Modern Slavery Practices - Provides an overview of the identified geographical, sector-specific, and supplier-related risks associated with Orora’s global operations.
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls to assess and address those risks, including due diligence and remediation processes	Section 3: Summary of Key Activities in FY24 Section 5: Due Diligence Framework These sections discuss the Human Rights Due Diligence Procedure, enhanced supplier engagement, and risk mitigation strategies, particularly in high-risk regions like China and Mexico.
Describe how the reporting entity assesses the effectiveness of these actions	Section 6: Assessing the Effectiveness of Our Actions - This section outlines Orora’s metrics for evaluating the success of its modern slavery risk management efforts, including ongoing supplier assessments and leadership engagement.
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement)	Section 1 and 5.3 and Appendix 2: Joint Statement and Consultation - Describes the involvement of various subsidiaries, including Saverglass, in the creation of the Modern Slavery Statement, with input from legal, procurement, and sustainability teams.

Appendix 2 – Joint Statement and Consultation

While not all entities within the Orora Group are subject to the Australian Commonwealth Modern Slavery Act, the scope of this statement includes the relevant entities that qualify as reporting entities under the Act.

Orora Limited (ABN 55 004 275 165) qualifies as a reporting entity under the Act, along with its wholly owned subsidiary, Orora Packaging Australia Pty Ltd. Together, Orora Limited and Orora Packaging Australia Pty Ltd form the Reporting Entities for the purposes of this joint statement. Additionally, this statement encompasses the operations of Saverglass, following its acquisition by Orora, including its operations in Western Europe, North America, and the Middle East/South West Asia. This joint statement responds to the requirements of the Act and applies to all relevant entities within Orora Group.

While our business operations differ across regions—including Australasia, North America, and Saverglass' regions of operation—Orora's corporate governance and risk management framework applies consistently throughout the entire Orora Group. This framework, approved by the Orora Board, ensures that our global operations are aligned in the identification and mitigation of modern slavery risks, regardless of geographic location.

This statement should be read in conjunction with Orora's other periodic and continuous disclosure announcements, including the FY24 Annual Report and Corporate Governance Statement, both available on our website at <https://www.ororagroup.com/investors>.

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