

Company Values and Guiding Principles

Orora Limited and its subsidiaries (Orora, we or us) is a leading global packaging and visual communications solutions company with a strong culture of integrity and ethical conduct, guided by the values set out in our Code of Conduct and Ethics¹. We are committed to conducting our business in a manner consistent with our values and in compliance with all applicable laws, regulations and internationally recognised standards. We have embedded the principles outlined in this Supplier Code of Conduct and Ethics (Code) as part of our sourcing and procurement processes, and seek to engage with suppliers and contractors who demonstrate similar values and adhere to the minimum requirements outlined in this Code.

Our suppliers play a vital role in helping us deliver the promises we make. This Code sets out our minimum expectations of you as one of our suppliers (supplier or you). We expect you to cascade these expectations throughout your organisation and supply chain. We encourage our suppliers to partner and work together with us and other supply chain partners to identify challenges and develop improvements.

In line with our values and commitment to the Ten Principles of the United Nation Global Compact², we are committed to working with you and all of our suppliers to ensure products and services that form part of Orora's operations and supply chain are procured in a transparent, and socially and environmentally responsible manner, as outlined in this Code.

This Code is supported by Orora's Supplier Assurance Framework (SAF), a two-tiered risk assessment framework that identifies and mitigates potential human rights, labour, environmental and governance risks within Orora's supplier base. For more information on the SAF please visit our website³.

This Code will be regularly reviewed and updated as required to ensure that it is operating effectively.

Scope

This Code applies to any person or entity that supplies goods or services to Orora anywhere in the world.

We expect you to familiarise yourself with this Code, and take action to ensure that you are complying with and communicate the Code to your related entities, suppliers and subcontractors who support you in supplying to Orora, so that they are aware of, understand and comply with this Code.

This Code is to be read in conjunction with any agreement you may have with Orora. Where there is inconsistency between this Code and applicable local laws and regulations, (to the extent that there is an inconsistency) you are expected to comply with the instrument that imposes the higher standard.

Where this Code refers to workers, this includes your employees, contractors, agents, migrants, and temporary workers.

1. Business Integrity and Legal Compliance

We compete lawfully and ethically in all activities. We work with suppliers who commit to:

- Complying with all applicable laws and regulations, including applicable modern slavery and competition laws
- Ensuring personal activities and interests of suppliers do not conflict with responsibilities or interests of Orora
- Not committing to, or becoming involved in, bribery or corruption of any form, including facilitation payments (payments to speed up routine actions)

¹ <https://www.ororagroup.com/investors/policies-and-standards>

² <https://www.unglobalcompact.org/what-is-gc/mission/principles>. The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

³ <https://www.ororagroup.com/about/responsible-sourcing>

- Not directly or indirectly supporting organisations and individuals associated with illegal activities, human rights abuses or terrorism

2. Health and Safety

We are committed to keeping our people and others safe every day. We work with suppliers who share this commitment by:

- Providing a safe and healthy working environment for workers, customers and the public, including provision of appropriate personal protective equipment and instruction, education and training for workers to carry out their duties safely
- Taking all practical and reasonable measures to eliminate workplace fatalities, injuries and disease
- Providing access to clean toilet facilities, potable water and sanitary facilities for food storage
- Where applicable, providing accommodation that is clean, safe, and meets the basic needs of the workers

3. Labour and Human Rights

We are committed to providing a working environment that is free from all forms of modern slavery and where there is mutual trust and respect. We work with suppliers who uphold fundamental human rights, including:

- Ensuring all work is freely chosen, without the use of forced, bonded or compulsory labour, and employees are free to leave their employment after reasonable notice
- Ensuring all workers are of local legal age, and the use of unlawful child labour⁴ is prevented. Suppliers must have robust mechanisms in place to verify each worker's right to work, including age where young people are concerned
- Ensuring fair and legally compliant remuneration (paid in a timely manner and without deduction as a disciplinary measure) and working conditions for all workers
- Ensuring working hours, including overtime, are reasonable and in compliance with all relevant laws, industry standards, and/or collective agreements applicable in the country where products and/or services are manufactured and/or delivered
- Promoting humane treatment and preventing harassment and unfair discrimination
- Not engaging in deceptive recruitment practices, directly or indirectly, including but not limited to, requesting workers to pay recruitment fees, not providing workers with written, accurate and understandable contracts of employment, withholding wages or making unlawful deductions and retaining workers personal documents, including identity papers. Particular attention should be paid by all suppliers to ensure the practices of temporary labour providers are in accordance with this Code
- Limiting the use labour-only contracting, sub-contracting or home working, and excessive use of fixed-term contracts of employment to genuine and necessary circumstances, and ensuring that these arrangements are not characterised as sham contracting arrangements
- Respecting workers' rights to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively. Where the right to freedom of association and collective bargaining is restricted under law, you must facilitate the development of parallel means of independent and free association and bargaining

4. Environment Protection and Sustainability

We are committed to protecting the environment and complying with our United Nations Global Compact obligations, framed by our sustainability approach through the People, Planet, and Prosperity pillars. We work with suppliers who share our commitment as demonstrated by:

- Promoting a culture that values the environment and acts to protect the environment in which they operate, including but not limited to, complying with applicable environmental laws, standards and notices from regulators

⁴ Suppliers must strictly prohibit the use of child labour in line with ILO Convention 138 on Minimum Age, and Convention 182 on the Elimination of the Worst Forms of Child Labour. These conventions require that no child below the age of 15 years (or 14 year where applicable) is allowed to work, subject to exemptions allowed by the ILO and National Law.

- Where applicable, ensuring fibre-based⁵ products are procured or supplied in accordance with applicable laws, including the Australian Illegal Logging Prohibition Act 2012, The US Lacey Act 1900, and the EU Forest Regulation (Regulation (EU) 995/2010), as amended
- Continually improving environmental and resource management – reduce, re-use and recycle
- Measuring, managing and reporting environmental data, including greenhouse gas emissions, energy and water consumption from their operations, in accordance with applicable laws and regulations
- Supporting community engagement initiatives aimed at employing, procuring and building capability within communities in which you operate and/or procure from

5. Business Continuity

We are committed to providing our goods and services to our customers in a timely manner and in line with contractual obligations. We work with suppliers who have adequate emergency preparedness and response plans for safeguarding their employees, operations, and security of supply in times of natural and unforeseen events.

6. Information Protection

We are committed to protecting our and other parties' information (confidential, proprietary and personal information) which we own or have possession or control over. We work with suppliers who protect our and other parties' information and provide information that is timely, accurate and relevant, including:

- Ensuring intellectual property rights of ours and other parties (including patents, trademarks, copyrights and confidential information) are respected and protected
- Implementing appropriate cyber security measures, including managing and monitoring your supply chain to protect Orora's data (and data which Orora may have custody or control over) from breaches
- Respecting privacy and complying with all laws in the collection, use and protection of personal information, and immediately reporting any suspected eligible data breach to us as soon as you become aware
- Immediately notifying us if you become aware of an alleged legal or information security breach, and cooperate with us in the resolution of any complaint alleging a breach of law or contractual obligation you may have with us

7. Integrity Reporting

Orora is committed to the highest level of corporate governance and encourages both disclosure and whistleblowing, in accordance with our Whistleblower Policy⁶. We encourage employees, contractors, suppliers and other stakeholders to raise any improper, illegal or unethical behaviour or activity concerns, which they genuinely believe to be in contravention of Orora's Codes of Conduct and Ethics, policies or the law. Concerns can be raised in accordance with Orora's Whistleblower Policy.

We expect our suppliers to implement and maintain policies and practices consistent with this Code in their own business/organisation and throughout their supply chain, and maintain appropriate management systems and documentation to support compliance with applicable laws and this Code. This includes providing workers and those with whom you conduct business with an anonymous and confidential means to report violations of your policies and practices and applicable laws without fear of reprisal, intimidation, or harassment and ensure that all concerns are appropriately addressed in a timely manner.

8. Monitoring

Orora reserves the right to verify your compliance with this Code through assurance assessments, audits or other means. Should we find that you do not comply with the Code, we reserve the right to demand corrective measures and/or exercise rights we may have to terminate our business relationship and related contract(s) with you.

⁵ Fibre is taken to mean fibre-based packaging such as corrugated boxes or folded cartons, and packaging and industrial paper and cartonboard as raw material in the manufacture of fibre-based packaging such as corrugated boxes or folded cartons.

⁶ <https://www.ororagroup.com/investors/corporate-ethics>