

Orora Modern Slavery Statement FY21

Our Commitment to Human Rights



Introduction

Orora Limited (**Orora**) is pleased to submit its Modern Slavery Statement for the financial year ended 30 June 2021 (**FY21**), 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 FY21 Annual Report, incorporating our Corporate Governance Statement, which is 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 provides a summary of our progress made against our FY21 priorities included in our FY20 statement, and notes where in this statement our progress is referred.

Appendix 2 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.

About Us

Orora's goal is to be a leading sustainable packaging solutions provider. The company is headquartered in Melbourne, Australia and listed on the Australian Securities Exchange (**ASX**). Our principal businesses are located in Australia, New Zealand and North America, but 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 2021.

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Figure 1

Orora at a glance

WHAT WE DO

BEVERAGE AUSTRALASIA

The Orora Beverage team work across Australia and New Zealand to provide state-of-the-art design and manufacturing solutions to packaging customers in the beverage industry. We work within three specialist business units, across Glass, Cans and Wine Closures, to craft and produce the glass bottles, aluminium cans, tabs and ends, closures and caps that keep consumers' favourite beverages safe for transport and consumption.

OPS NORTH AMERICA

In Orora Packaging Solutions (OPS) our team work across 11 business units to lead the US market in custom packaging and supply chain optimisation. From corrugated manufacturing, equipment and automation, we create total packaging solutions to serve a range of sectors including food, beverage, automotive, industrial and healthcare, offering complementary services in global product sourcing, distribution, design and printing.

ORORA VISUAL NORTH AMERICA

Orora Visual delivers cutting-edge visual communication and Point-of-Purchase solutions to customers across a range of sectors. Our team provides print, finishing, displays, packaging, creative services, fulfilment, and distribution, plus value-add services in store profiling, mobile technology, rapid prototyping and vendor managed inventory.



HOW WE DO IT

22

Manufacturing plants

74

Distribution sites

3.7k

Team members

44k

Shareholders

WHERE WE ARE

7

Countries

FY21 HIGHLIGHTS

\$3,538.0m

SALES REVENUE

\$249.1m

EBIT

Our operations and supply chains

Orora has a large, geographically diverse and complex supply chain to support our 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 FY21 are set out in Figure 1 and Appendix 3.

Our approach and commitment

We have always been committed to our people, and the protection of our people and human rights is a core component of our sustainability strategy and focus.

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

Our sustainability efforts as depicted in Figure 2 below are guided by our recently redefined three pillar sustainability strategy of Circular Economy, Climate Change and Community which is "our promise to the future" and aligns to the expectation of our key stakeholders and 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 (which incorporates our Corporate Governance Statement), which should be read in conjunction with this statement.

Protection of our people and human rights is core to our sustainability Community pillar. We oppose all forms of slavery in our operations and the operations of our suppliers. We are committed to identifying, assessing and mitigating human rights

impacts, providing access to remedy through effective grievance/complaint mechanisms and ensuring continuous improvement to strengthen our actions. Although 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 look for it, to provide us with the opportunity to:

- understand, refine and improve our processes for identifying and managing modern slavery and broader human rights risks
- work across the Orora Group to promote human rights and identify opportunities to collaborate to enhance our management of human rights risks
- seek to anticipate the evolving nature of human rights and Orora's responsibility to respect human rights, including in times of uncertainty and challenge.

Further information on our approach to sustainability, primarily on our sustainability activities under our previous People, Planet and Prosperity pillars during FY21 can be found in our 2021 Annual Report available at www.ororagroup.com/investors and on our website at www.ororagroup.com/sustainability.

Figure 2

Our Promise to the Future



Circular Economy

- Recycled content
- Recyclable packaging
- Recyclable substrates
- Certification



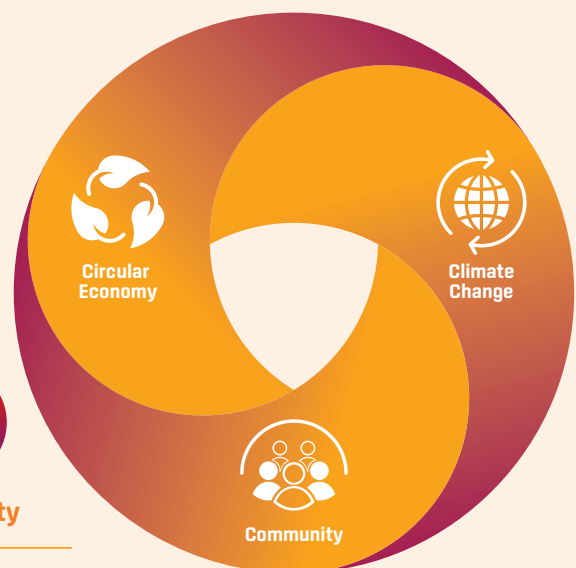
Climate Change

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



Community

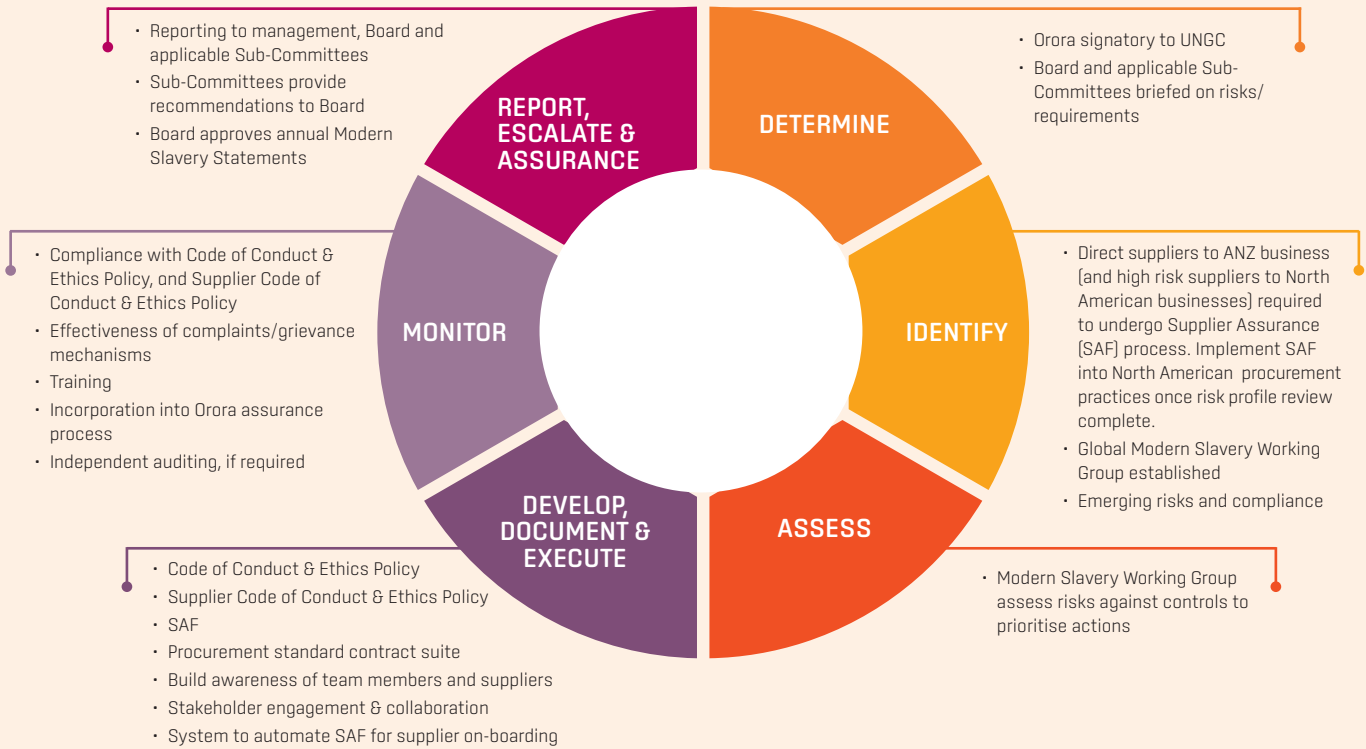
- Safety & health
- Diversity, equity & inclusion
- Human rights and supply chain
- Responsible sourcing



Governance of modern slavery at Orora

Our governance of modern slavery at Orora depicted in Figure 3 and described below aligns with Orora’s enterprise risk management framework.

Figure 3



Our enterprise risk management and modern slavery governance framework

We have an enterprise risk management framework, the management of which is a priority for senior management, and is sponsored by the Orora Board.

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, relevantly including:

- enhancing shareholder value through improved share price and earnings growth in the short to medium term whilst building a sustainable business for the longer term
- improving stakeholder confidence and trust
- safeguarding the company’s assets - human, property, reputation, knowledge
- 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 across the business. Orora’s assurance function, which includes the Internal Audit

function, plays a key role in reviewing the effectiveness of our compliance and control systems, including risk management. 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.

Our cross-functional Modern Slavery Working 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 to ensure compliance with applicable laws and standards
- reports and provides recommendations to the Safety, Sustainability & Environment and Audit, Risk & Compliance Committees of the Board, who provide recommendations to the Board.

The Board ultimately oversees health, safety and modern slavery risks and ensures timely disclosures and corporate reporting in accordance with applicable laws and our risk management framework.

Policies and governance documents

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 how we can engage with and encourage 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/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 applicable Board sub-committee, which make recommendations to the Board.

Requirements for suppliers

Our global Supplier Code of Conduct and Ethics Policy (**Supplier Code**) complements our Code and sets minimum standards for our suppliers and their supply chain in line with our Code, values 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 in the "Due diligence - actions taken to assess and address modern slavery risk" section 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 our operations and complex supply chain through a variety of circumstances.

We collect and monitor internal and external information for use as data points to inform and improve the definition of our risk profile, and support our human rights risk assessments. These data points were reviewed during FY21 and include:

- reviewing external indices (such as the Global Slavery Index¹, Freedom House, Freedom In The World Index², World Bank World Wide Governance Index³ and The Fund for Peace, Fragile States Index⁴)
- supplier spend
- supplier requirement to comply with international modern slavery legislation
- tracking case law, emerging legislation and news alerts

- reviewing supplier self-assessments, including through SEDEX/ EcoVadis
- Whistleblower cases.

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.

We will continue to use a range of internal and external data sources to continually improve the definition of our risk profile, which informs our due diligence approach discussed in the “Due diligence - actions taken to assess and address modern slavery risk” section below.

Our current risk profile

After reviewing our data points against the goods and services procured by our businesses, it was concluded that our higher risk categories have not changed since FY20.

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.
Goods and services profile risks	<p>Our higher risk goods categories include:</p> <ul style="list-style-type: none"> • 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, without adequate contractual arrangements and due diligence 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 our operations. • PPE and other safety supplies - the 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. <p>Our higher risk service categories include:</p> <ul style="list-style-type: none"> • 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. • 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.

As a result of the divestment of our Australasian Fibre Business in FY20, Orora's risk profile and inherent risk requirements in respect of fibre suppliers to our business are now less material. Orora's North American corrugate business complies with our Responsible Sourcing Fibre Policy and has a supply arrangement in place with the purchaser of our divested Fibre Business with respect to the procurement of recycled paper products from Orora's divested Fibre Business based in Australia

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

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

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

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

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

All of our manufacturing operations based in Australia, New Zealand and North America have a low prevalence of modern slavery country occurrence [Global Slavery Index 2018⁶] and a strong regulatory environment

As noted above in our current risk profile, we recognise that procurement of some goods and services (including raw materials used for manufacturing or packaged products to support customer needs, and labour hire and management facility services) outside of these jurisdictions, including from Asia and Mexico, carries inherently higher modern slavery risk [Global Slavery Index 2018⁶].

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, including diversity, equity and inclusion

Orora is committed to an inclusive workplace that embraces and promotes diversity. Our global human resources processes and policies are designed to ensure that our team members are paid fairly, in compliance with applicable labour laws, and treated fairly and with dignity, courtesy and respect.

Safety and health

The safety, health and wellbeing of our people is paramount. We continue to invest in safety to drive improved performance across the business.

Orora has continued to be recognised as an essential service provider during the COVID-19 pandemic across Australasia and North America. During FY21, we continued to implement and maintain a range of measures in response to the global pandemic, to mitigate the risk of transmission into and at Orora's sites and. These measures are ongoing. As we respond to the ongoing challenges of COVID-19, we will continue to focus on keeping our people safe and well, and maintaining continuity of our operations and supply to our customers.

Please refer to our website at www.ororagroup.com and our 2021 Annual Report, which incorporates our Corporate Governance Statement, available at <https://www.ororagroup.com/investors> for further information on our safety, health and wellbeing, and diversity, equity and inclusion activities.

Sustainability

Our sustainability team has a number of risk mitigation and robust processes in place to ensure oversight and achievement of our redefined sustainability goals, 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 4, 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.

Figure 4



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

Suppliers assessed as high risk based on our internal risk assessment criteria are requested to join SEDEX or EcoVadis, link with Orora and complete a further risk assessment based on the SEDEX/EcoVadis self-assessment questionnaire, and undertake an ethical SEDEX Ethical Trade Audit, if applicable and as required. Suppliers who receive a high risk rating following a SEDEX/EcoVadis assessment are assessed and required to partner with Orora to 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 may be removed as suppliers to our business.

During FY21, our SAF tool and process were analysed and reviewed by external consultants for currency and fitness for purpose. Recommendations were incorporated into our SAF to improve the risk rating of our suppliers.

During the financial year, a Supplier Assessment Questionnaire (**SAQ**) was also implemented into our SAF to provide extra rigour to the assessment of suppliers who rank as high risk on the basis of their initial SAF assessment. Supplier returned responses are then utilised to recalibrate their risk scores in the SAF tool.

The updated SAQ was distributed to 11 Tier 1 labour hire and cleaning service suppliers to our Australasian or North American businesses who were assessed as high risk following our initial SAF assessment, and returned SAQ responses received were utilised to recalibrate their risk scores in our SAF. We are awaiting return of some completed SAQ responses from suppliers to our North American businesses.

The combined SAF and SAQ assessments have revealed that 2 suppliers to our Australasian businesses have been determined as high risk. For these suppliers, their assessment via SEDEX has commenced.

The process of final risk determination for our North American Tier 1 labour hire and cleaning service suppliers will continue into FY22, and the results will be utilised to determine the most effective way to fully implement our SAF into our North American procurement practices.

In FY22 and beyond, we will continue to undertake a risk-based phased approach to continually assess existing suppliers based on our risk profile.

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

In FY21, additional mandatory modern slavery training was undertaken by Directors and the Executive Leadership Team. All members of our procurement team throughout Australasia and North America and select members of our legal team who have regular touchpoints with human rights issues also undertook further focused mandatory modern slavery training, including in respect of our updated SAF.

Assessing our actions and outcomes

There are currently no fundamental units of measurement or international standards for measuring human rights impacts. This is a complex issue that presents a challenge for all companies in terms of providing credible measurements as to their effectiveness in addressing modern slavery risks.

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

1. The Board, via the Safety, Sustainability & Environment, and Audit, Risk & Compliance Committees, receives regular updates on the above actions and how Orora is progressing, together with management updates on governance, market trends and network updates that may impact the way we manage human rights issues in our operations and supply chain. Suggestions for improvement of our SAF have been progressively incorporated, including in FY21.
2. The Managing Director & CEO and Executive Leadership Team are regularly updated on the progress of the above.
3. Orora undertakes a risk-based phased approach to continually assess its suppliers. In FY22 our updated SAF will be reinstated as an on-boarding requirement for all new suppliers to our Australasian business. Our updated SAF will be implemented into our North American procurement practices following further review and determination of the most effective means of implementation.
4. There is ongoing communication between Orora and its suppliers on the Supplier Code of Conduct and Ethics Policy and compliance with key modern slavery contractual requirements, including discussions on any issues identified, and how to address them. Independent audits will be undertaken, if required.
5. Orora's sustainability performance is reported in the company's Annual Report, incorporating its Corporate Governance Statement, which is available on Orora's website and lodged with the ASX. Orora's website also contains updates on our sustainability activities.
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. 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 2022 financial year, our key focus areas will be to:

- Complete our review of existing labour hire and cleaning service providers suppliers to our Australasian and North American businesses, and request any suppliers determined as high risk through our improved SAF to undertake a SEDEX/ EcoVadis assessment
- Reinstate our SAF as an on-boarding requirement for all new suppliers to the Australasian business, following system upgrades and the review and improvements made to our SAF during FY21
- Continue the risk profile review of our North American businesses, to enable us to gain a better insight into any instances or risks of modern slavery within those operations or their complex supply chains, and determine the most effective way to fully implement our SAF into our North American procurement practices
- Implement further mandatory modern slavery training for employees in our human resources teams in Australasia and North America, in addition to Group human rights and modern slavery awareness campaigns.

Approvals

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 29 November 2021.



BRIAN LOWE
Managing Director & CEO

Appendix 1 – Progress against our FY21 priorities

FY21 priority	Progress	Statement reference
<p>Have undertaken an assessment of all new and recontracted labour hire and cleaning service suppliers to our Australasian business through our SAF.</p> <p>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.</p>	<p>During FY21, our SAF tool and process were analysed and reviewed by external consultants for currency and fitness for purpose. Recommendations were incorporated into our SAF to improve its adequacy in risk rating of suppliers.</p> <p>The improved SAF tool was utilised during the financial year in the assessment of Tier 1 labour hire and cleaning services suppliers across Australasia. Whilst our SAF has not yet been fully implemented into our North American procurement practices, the improved SAF tool was also utilised in the assessment of Tier 1 labour hire and cleaning service suppliers to our North American businesses, given the inherent risk profile attached to these suppliers. 79 labour hire and cleaning services suppliers to our Australasian or North American businesses undertook our SAF assessment.</p> <p>During the financial year, a Supplier Assessment Questionnaire (SAQ) was also implemented into our SAF to provide extra rigour to the assessment of suppliers who rank as high risk on the basis of their initial SAF assessment. Supplier returned responses are then utilised to recalibrate their risk scores in the SAF tool.</p> <p>The updated SAQ was distributed to 11 Tier 1 labour hire and cleaning service suppliers to our Australasian or North American businesses who were assessed as high risk following our initial SAF assessment, and returned SAQ responses received were utilised to recalibrate their risk scores in our SAF. We are awaiting return of some completed SAQ responses from suppliers to our North American businesses.</p> <p>The combined SAF and SAQ assessments have revealed that 2 suppliers to our Australasian businesses have been determined as high risk. For these suppliers, their assessment via SEDEX has commenced.</p> <p>Page 9 The process of final risk determination for our North American Tier 1 labour hire and cleaning service suppliers will continue into FY22, and the results will be utilised to determine the most effective way to fully implement our SAF into our North American procurement practices.</p>	<p>Page 10</p>
<p>Implement further mandatory modern slavery training for employees identified as having regular touchpoints with human rights across the business</p>	<p>In FY21, additional mandatory modern slavery training was undertaken by Directors and the Executive Leadership Team. Additionally, all members of our procurement team throughout Australasia and North America and select members of our legal team who have regular touchpoints with human rights issues undertook further focused mandatory modern slavery training, including in respect of our updated SAF.</p>	<p>Page 10</p>

Appendix 2 – 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.

Orora Limited (ABN 55 004 275 165) qualifies as a reporting entity under the Australian Commonwealth Modern Slavery Act. Orora Packaging Australia Pty Ltd (a wholly owned subsidiary of Orora Limited), also meets the reporting test set out in the Australian Commonwealth Modern Slavery Act. Orora Limited, together with Orora Packaging Australia Pty Ltd comprise the Reporting Entities. This statement is a joint statement and responds to the Commonwealth Modern Slavery Act requirements.

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 FY21 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, 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 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.

Appendix 3 – Orora’s principal business groups, operations and supply chains during FY21

Business group	Operations	Operations location[s]	Direct Supply Chain Categories
Beverage	The Orora Beverage team work across Australia and New Zealand to provide state-of-the-art design and manufacturing solutions to packaging customers in the beverage industry. We work within three specialist business units, across Glass, Cans and Wine Closures, to craft and produce the glass bottles, aluminium cans, tabs and ends, closures and caps that keep consumers’ favourite beverages safe for transport and consumption.	Australia and New Zealand	<ul style="list-style-type: none"> Raw Materials (soda ash, sand, cullet, limestone, other chemical products supporting glass manufacturing, aluminium, inks, metal treatments and varnishes for cans and closures manufacturing) Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods) Packaged Materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs) Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)
Orora Packaging Solutions	In Orora Packaging Solutions our team work across 11 business units to lead the US market in custom packaging and supply chain optimisation. From corrugated manufacturing, equipment and automation, we create total packaging solutions to serve a range of sectors including food, beverage, automotive, industrial and healthcare, offering complementary services in global product sourcing, distribution, design and printing.	United States of America, Mexico, Canada and UK/ Scotland	<ul style="list-style-type: none"> Raw Materials (paper, foam, plastic sheets, inks, adhesives, other chemical products supporting corrugated manufacturing) Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods) Direct Materials (Corrugated & Resin custom converted products, Food Containers, Warehouse, Office, Facility Supplies & Machinery) required to support customer requirements) Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)
Orora Visual	Orora Visual delivers cutting-edge visual communication and Point-of-Purchase solutions to customers across a range of sectors. Our team provides print, finishing, displays, packaging, creative services, fulfilment, and distribution, plus value-add services in store profiling, mobile technology, rapid prototyping and vendor managed inventory.	United States of America	<ul style="list-style-type: none"> Raw Materials (paper, plastic sheets, specialty or name brand print media, corrugate mounting sheets, adhesives, inks, other chemical products supporting print manufacturing) Indirect Materials (professional services, maintenance, repair and operation supplies, logistics and warehousing services, utilities, capital goods) Packaged Materials (strapping, films, cardboard boxes, tapes and other contract manufactured materials required to support customer needs) Skilled labour and services (production and trade labour, maintenance contractors, skilled contract workers, other labour resources to support business operations)

