

At Orora Limited (Orora), our business practices are shaped by a commitment to responsible and ethical operations, guided by a set of core values that prioritise human rights and personal security, fostering workplaces free from harassment and abuse. We support universal human rights standards, embracing political, civil, economic, labour, social, and cultural rights without discrimination and uphold a firm stance against slavery, forced labour, and child labour within our operations and supply chain.

As a testament to our commitment, Orora is a signatory to the United Nations Global Compact (UNGC) and actively endorses the United Nations Guiding Principles (UNGP) on Business and Human Rights.

This policy applies to Orora, its subsidiaries, and also extends to our suppliers, who are expected to adhere to these standards with equal diligence.

Our Approach

This policy describes our approach to supporting human rights throughout our global operations and supply chain. The safeguarding of our people and promotion of human rights are core elements of our sustainability strategy. Our sustainability strategy, “Our Promise to the Future”, is embedded in our dedicated pillars of Community, Climate Change and Circular Economy.

Our approach under our Community pillar is rooted in adherence to local and global principles, including:

- Respecting internationally recognised human rights outlined in the International Bill of Human Rights.
- Operating in alignment with the UNGPs and the 10 UNGC Principles.
- Complying with applicable laws and regulations in the countries where we operate, applying the higher standard in compliance with the local customs, norms, rules or regulations.

Our Commitment

Orora's dedication to human rights is centred around the protection of fundamental rights for individuals within our organisation and throughout our supply chain. These encompass a comprehensive range of international and national labour rights, ensuring fair compensation, safe and dignified working conditions, gender equality, non-discrimination, and safeguarding against modern slavery including, forced labour and child labour. Additionally, we are dedicated to fostering strong and positive relationships with local communities through our operations, striving to be a trusted corporate citizen.

Our people:

Orora is committed to ensuring that our employment practices remain free from any form of bias, encompassing factors such as sex, ethnic or national origins, colour, race, marital status, sexual orientation, age, disability, family status, employment status, religious belief, ethical belief, or political opinion. Our commitment is grounded in the following principles:

- The health and safety of all team members is prioritised and safeguarded in the workplace.
- Ensuring all work is freely chosen, without the use of forced, bonded or compulsory labour, and team members are free to leave their employment after reasonable notice, and in compliance with local laws.
- Ensuring fair and legally compliant remuneration (paid in a timely manner and without deduction as a disciplinary measure) and safe working conditions for all team members.
- Ensuring all team members are of local legal age, and the use of unlawful child labour is prevented.
- 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.

¹ As defined by the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

- Respecting team members’ rights to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively.
- That team members experience equitable and unbiased treatment, with access to opportunities and a work environment free from discrimination, harassment, intimidation, or coercion.
- That team members are made aware and have access to grievance processes.
- That the organisation/Orora will not engage in deceptive recruitment practices, including, requesting team members to pay recruitment fees, not providing team members with written, accurate and understandable contracts of employment, withholding wages, or making unlawful deductions as well as retaining team members personal documents, including original identity papers.

Our Communities and Suppliers:

Orora respects the communities in which we operate and those from which we source raw materials, products, services and various supplies. Our Supplier Code of Conduct (Supplier Code) provides a set of conditions to support our goal to purchase supplies that are produced in a socially responsible and environmentally sustainable manner.

All Orora’s suppliers are required to comply with the Supplier Code. We also expect our suppliers to ensure that any third party they engage with in the process of manufacturing goods or providing services for Orora, or on our behalf, operates in a manner consistent with our Supplier Code.

Our Due Diligence

In alignment with the UNGP and in accordance with Australian Government guidance, our human rights due diligence process aims to evaluate both current and potential human rights impacts, utilising a risk-based approach. This process comprises four key components (as shown in Figure 1 below):

1. **Identify and Assess:** We identify and assess any actual or potential adverse human rights impacts that our company may cause, contribute to, or be directly linked to.
2. **Manage and Mitigate:** We take appropriate action to manage and mitigate these impacts, integrating the findings from impact assessments into relevant company processes.
3. **Remediate and Collaborate:** We ensure that appropriate remedial measures are taken to address any identified issues, actively collaborating with stakeholders in this process.
4. **Report Assurance:** We track the effectiveness of our measures to remediate human rights impacts, assessing their success. Additionally, we communicate with stakeholders about how these impacts are being addressed and demonstrate the adequacy of our policies and processes.

Through these steps, we aim to continuously improve our approach to human rights due diligence, fostering transparency, accountability, and meaningful engagement with all stakeholders.

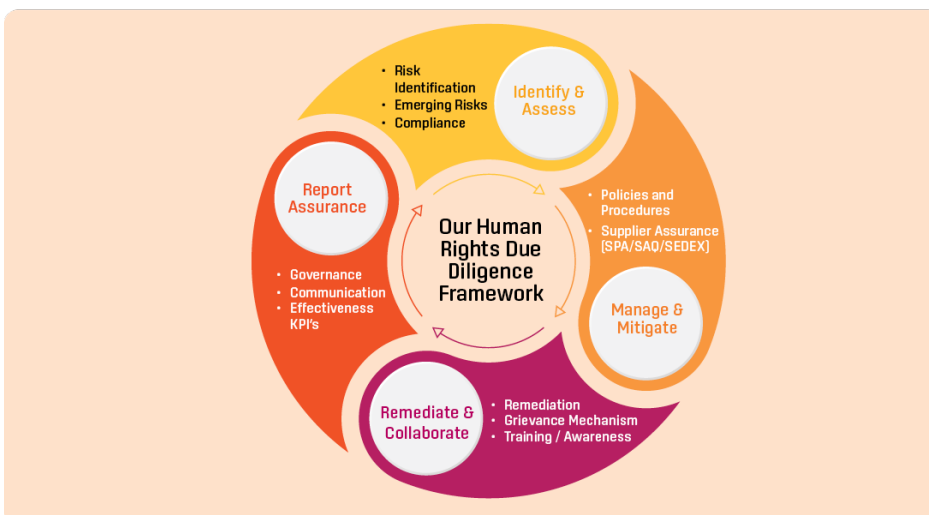


Figure 1: Orora Human Rights Due Diligence Framework

Implementation and Remedy

Orora is dedicated to upholding this Policy across its global operations by developing and implementing relevant standards, processes and procedures. Consistent with this, we will:

- Communicate this policy to team members, contractors, suppliers, and customers.
- Educate and train team members and suppliers to ensure that this policy and its associated standards and procedures are understood and integrated into everyday work practices.
- Strive to be a valued member of the community aiming to safeguard the health, safety and human rights of our team members as well as championing diversity, equity and inclusion, guided by the Orora Values.
- In the event that our operations cause or contribute to adverse human rights impacts, we are committed to providing effective remedies. This may involve direct engagement with affected individuals or collaboration with our suppliers and other third parties to address issues, as well as a thorough evaluation of internal processes to prevent similar incidents in the future.

Raising a Grievance

Our Code of Conducts and Ethics Policy (Code) places a strong emphasis on cultivating a culture of integrity and ethical conduct, aligning closely with this Human Rights Policy and the Whistleblower Policy. The guidelines establish clear expectations for all team members and third parties, including suppliers and contractors, covering a broad range of issues such as environmental management, safety, health, and human rights. We encourage all stakeholders to report any reasonably suspected misconduct, improper situations, or circumstances within the Company. Reports may relate to unethical or illegal behaviour, human rights concerns, coercion, harassment, discrimination, fraud, corrupt practices, workplace safety, and environmental hazards. Reporting channels are outlined in our Whistleblower Policy, accessible online at www.ororagroup.com/investors/corporate-ethics, with an option for anonymous reporting through an independent third-party integrity reporting service at www.ororagroup.deloitte.com.au, or the equivalent policy for our European operations.

Our grievance and reporting procedures are designed to ensure safe and transparent processes for the investigation and response to claims and concerns. These procedures operate in an ethical, confidential, and transparent manner. All claims, concerns, and investigation outcomes are reported to the relevant Board sub-committee, which subsequently provides recommendations to the Board.

Governance and Reporting

The Orora Board and Executive Leadership team are accountable for leading and promoting risk management throughout the organisation. The Board also oversees human rights risks and ensures timely disclosures and corporate reporting in accordance with applicable laws and our risk management framework. The Board at Orora holds the responsibility for ensuring strict adherence to these commitments.

Our assurance function, including Internal Audit, critically evaluates the efficiency of our compliance and control systems, including risk management. The Safety, Sustainability & Environment Committee (SSEC) is responsible for overseeing the approach and management of our commitments to human rights issues, including modern slavery risk mitigation across the business. The Human Resources Committee assists the Board in overseeing its responsibilities in relation to the Company's people and culture, and policies and practices.

Our commitment to transparency with stakeholders on human rights issues within our business is demonstrated through reporting in the Orora Annual Report, our Corporate Governance Statement and the Orora Modern Slavery Statement.

Consultation and Review

Personnel across the organisation were consulted during the development and review of this Policy, including the Chief Safety, Sustainability & Governance Officer and other team members who are responsible for the related Policies, statements, and frameworks. This Policy is reviewed at least every two years, and tabled before the SSEC with the next review to be completed no later than August 2026.

Supporting Documentation

Code of Conduct and Ethics Policy

Supplier Code of Conduct

Modern Slavery Statement

Health and Safety Policy

Working with Respect Policy

Diversity and Inclusion Policy

Integrity Reporting Service – Whistleblower Policy

Anti-bribery and Anti-Corruption Policy

Signed June 2024

A handwritten signature in black ink, appearing to read "Brian Lowe".

Brian Lowe
Managing Director and CEO