



In 2010, the State of California adopted the Transparency in Supply Chain Act, which requires certain retailers and manufacturers to post a disclosure statement on their web site detailing whether, and to what extent, they investigate or monitor slavery or human trafficking in their direct product supply chains.

In accordance with the requirements of the Act, Orora Packaging Solutions , its divisions and subsidiaries (collectively “Orora”), hereby declares that it requires suppliers in its direct product supply chains to comply with applicable laws, will investigate claims brought to its attention regarding the use of slavery or human trafficking by its suppliers and will take appropriate action to discontinue use of a supplier that uses such labor. Orora further requires direct suppliers to certify in purchase agreements that materials incorporated into their products comply with the laws addressing human trafficking and slavery of the country or countries in which they are doing business and that it adheres to Orora’s Code of Conduct and Ethics which includes a commitment to provide a work environment free from all forms of modern slavery. Orora management is not aware of any claims regarding the use of slavery or human trafficking by any member of Orora’s direct supply chains since the company was founded in 1948.

Except as disclosed in the preceding paragraph and because there is no known claim of use of slave or human trafficking labor by Orora suppliers in the history of the company, Orora has not (a) reviewed its product supply chains to evaluate and address risks of human trafficking and slavery or employed a third party to audit or evaluate such risks, (b) established entity standards on human trafficking and slavery and then conducted supplier audits to evaluate whether suppliers comply with standards, (c) maintained internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking, or (d) provided company employees and management, who have direct responsibility for supply chain management, training on slavery and human trafficking and how to mitigate risks along the product supply chain.