

# Code of Conduct

## 1. Purpose

Opal is a member of the Nippon Paper Group which is one of the world's 10 largest paper and packaging companies.

The Nippon Paper Group aims to contribute to better living and cultural progress everywhere it does business and Opal seeks to operate in line with this mission. We are committed to the long-term growth of our business and contributing positively to the communities in which we operate and are dedicated to embedding safety and sustainability into our culture, values, decision making and products.

Our Ethical Principles and Values are the foundations for the manner in which we conduct our business – across our relationships internally and also externally, including with our contractors, suppliers, dealers and our customers.

This Code of Conduct (**Code**) promotes a common understanding of how we will conduct our business and sets out Opal's expectations of the conduct of our workforce in striving to achieve our mission.

This Code applies to all Opal personnel including directors, officers, employees, secondees, labour hire workers and any person engaged or contracted under a contract for services (**Workers or you**).

You are expected to comply with this Code and any relevant policies at all times and anywhere (both on and off-site) that you are conducting Opal business or representing Opal as your conduct may reflect upon Opal, even if this occurs outside normal business hours.

## 2. Ethical Principles

### Acting with integrity

We are dedicated to conducting our business in accordance with the highest standards of integrity and we use our best endeavours to integrate ethical and socially responsible practices into all aspects of our operations.

At all times, we comply with state, federal and international laws applicable to our business.

### Respecting human rights

We respect the protection of human rights internationally proclaimed in the Universal Declaration of Human Rights, and the fundamental principles and rights at work<sup>1</sup> which recognise:

- freedom of association;
- the right to collective bargaining;
- the elimination of all forms of forced or compulsory labour;
- the abolition of child labour; and
- the elimination of discrimination in respect of employment.

<sup>1</sup> ILO Declaration on Fundamental Principles and Rights at Work adopted by ILO 18 June 1998

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### Respecting each other and the community

#### (a) Quality and Safety

Safety is a priority for our business. We strive to provide and maintain a safe and hygienic work environment, working together with employees, unions, contractors and suppliers to achieve this.

We are committed to producing high quality products that are safe to use.

#### (b) Diversity, inclusion and equal opportunity

We value diversity and treat each other with respect. We do not tolerate unlawful discrimination, harassment, vilification or bullying.

We work collaboratively across our teams and business divisions, and with our suppliers, contractors and the wider community, to leverage diverse perspectives, knowledge and skills.

We provide equal employment opportunities for all our Workers at all levels across our business.

#### (c) Our community

We aim to maximise our social and economic contribution to the communities in which we operate.

This includes supporting local employment, working in partnership with the community and contributing to a strong local economy by creating shared value.

### Respecting the environment

We actively seek to minimise the impact of our operations on the environment, going beyond compliance in our operations to build the sustainability of resources and environments.

## 3. Vision and Values

### Opal's Vision:

Opal shapes the future through sustainable packaging.

### Opal's Values:



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### 4. Conduct

#### 4.1 Quick Checklist

DO	DON'T
<ul style="list-style-type: none"><li>✓ Put safety first</li><li>✓ Take care for your own health and safety and the health and safety of others</li></ul>	<ul style="list-style-type: none"><li>✗ Treat safety as someone else's responsibility</li></ul>
<ul style="list-style-type: none"><li>✓ Treat everyone with dignity, courtesy and respect</li></ul>	<ul style="list-style-type: none"><li>✗ Harass, bully, belittle, intimidate or exclude people</li></ul>
<ul style="list-style-type: none"><li>✓ Listen to and value the contributions of others, work as one team to find solutions</li></ul>	<ul style="list-style-type: none"><li>✗ Be a silo worker who does not share information or consider other perspectives</li></ul>
<ul style="list-style-type: none"><li>✓ Use social media responsibly</li></ul>	<ul style="list-style-type: none"><li>✗ Use social media in a way that will bring Opal into disrepute</li></ul>
<ul style="list-style-type: none"><li>✓ Always act in the best interests of Opal</li><li>✓ Avoid situations or relationships that give rise to a conflict of interest</li></ul>	<ul style="list-style-type: none"><li>✗ Use your position to further your own interests</li></ul>
<ul style="list-style-type: none"><li>✓ Act with integrity</li><li>✓ Be cautious when accepting or offering gifts or invitations in the course of developing business relationships</li></ul>	<ul style="list-style-type: none"><li>✗ Offer, provide, or accept bribes or commissions in return for business advantages</li></ul>
<ul style="list-style-type: none"><li>✓ Protect confidential information, including personal information relating to workers, customers and suppliers</li></ul>	<ul style="list-style-type: none"><li>✗ Disclose confidential business or personal information</li></ul>
<ul style="list-style-type: none"><li>✓ Actively seek opportunities to reduce the environmental impact of Opal's operations and products, including through ethical sourcing</li></ul>	<ul style="list-style-type: none"><li>✗ Cut corners on environmental responsibility</li></ul>
<ul style="list-style-type: none"><li>✓ Take action or speak up if you come across any unethical, wrongful or inappropriate behaviour</li></ul>	<ul style="list-style-type: none"><li>✗ Turn a blind eye to unethical, wrongful or inappropriate behaviour</li></ul>

#### 4.2 Safety

Our Zero Harm philosophy applies across the whole of our organisation, from the mills to our transportation and logistics operations to our corporate offices.

You must ensure that you comply with all Safety Principles, wear personal protective equipment where required to do so and comply with individual site policies and procedures.

You are responsible for your own health and safety as well as the health and safety of your co-workers.

You are expected to comply with all workplace health policies and procedures.



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### 4.3 Respecting human rights

We respect the inherent dignity and the human rights of all our Workers, in particular in relation to the fundamental freedoms and rights at work. This means that you must:

- be of legal age to work and not subject to any forced or bonded labour;
- not be required to lodge deposits or other identity papers;
- be free to leave your employment and the workplace without unreasonable consequences;
- be free to volunteer or decline to work overtime in accordance with applicable industrial instruments and laws; and
- have the right to associate and organise freely and be free to join or form a union and participate in collective bargaining.

We will provide all Workers with information clearly explaining the terms and conditions on which they are engaged.

We will work with our suppliers to encourage and promote the same standards. Where you work with our suppliers, you should familiarise yourself with Opal's Supplier Code of Conduct and the process for engaging with suppliers to meet the standards set out in that Code.

### 4.4 Diversity and inclusion

We recognise and value the difference between individuals. We value diversity of experience and perspective and accept that the best solutions may come from different parts and levels of the organisation.

We aim to provide an environment where everyone within our workplace treats each other with dignity, courtesy and respect. This means we are all expected to:

- promote and build a culture of respect within the workplace;
- communicate in an open, honest, respectful and non-judgmental manner with one another;
- respect and be sensitive to an individual's cultural, ethnic and religious background; and
- not engage in, and should actively discourage and address any form of unreasonable bias, exclusionary, humiliating or bullying behaviour, harassment or unlawful discrimination.

We expect you to develop productive and supportive relationships with each other across all business units and levels or seniority within the organisation.

Leaders and managers are expected to meet these standards, lead by example and to actively address behaviour that does not meet these standards.

All Workers are expected to comply with our policies and procedures that promote diversity, inclusion and equal opportunity in employment.

### 4.5 Avoid conflicts of interest

You must avoid situations in which your personal interests conflict or interfere with you acting in the best interests of Opal. If a conflict of interest arises, full disclosure of that conflict must be made to your manager as soon as possible.

A personal or intimate relationship may be considered a conflict of interest if:

- two team members have a direct reporting relationship; or
- one team member is in a position to influence the other's remuneration, performance reviews, career progression or any other key decisions in relation to their employment; or
- one team member has a role in Human Resources in which they have responsibility for that person or direct access to remuneration details for that person or that person's colleagues or manager.



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Such relationships must be immediately disclosed. Opal will take all reasonable steps to ensure that confidentiality of this information is maintained. Disclosure of the relationship will enable Opal to carefully manage actual or perceived conflicts of interest. If such relationships are not disclosed this may result in disciplinary action, up to and including termination of employment.

Workers must also be aware that conflicts of interest can arise if they are in a personal or intimate relationship with contractors, customers, suppliers or other business associates, and you should take the same steps and disclose this relationship as soon as possible.

### **4.6 Use of social media**

You must ensure that your use of social media, whether on Opal's computer systems or otherwise, and whether personal or professional, or during or outside normal work hours, does not breach this Code or any social media policy.

This includes ensuring that your private use of social media does not bring Opal into disrepute or have the potential to damage our reputation or business.

### **4.7 Managing information responsibly**

In carrying out our business we will respect the privacy of individuals and maintain confidentiality and accuracy of business records.

You are responsible for protecting Opal's intellectual property and confidential information, this includes information relating to our customers and suppliers.

You must not use or disclose any information that is confidential without written authorisation or use this information for your own personal benefit or in any manner that is inconsistent with Opal's values or interests.

You should at all times carry out business in compliance with Opal's Privacy Policy.

### **4.8 Fraud and corruption**

Opal maintains appropriate measures to prevent, detect and manage the occurrence of bribery and corruption and, at a minimum, comply with all applicable laws.

You are prohibited from offering, providing, requesting or receiving bribes, kick-backs, secret commissions or facilitation payments to influence individuals to award business opportunities to Opal, make a business or regulatory decision in our favour, grant or permit services, or secure an unfair advantage.

We recognise that on occasion gifts may be received and sent. However, you should be cautious when sending or receiving any gifts of any value.

You can report concerns about fraud and corruption in accordance with Opal's Whistleblower Policy.

In carrying out our business we will respect the privacy of individuals and maintain confidentiality and accuracy of business records. You should at all times carry out business in compliance with Opal's Privacy Policy and Opal's Anti-Bribery and Anti-Corruption Policy.

### **4.9 Environmental responsibility**

We are committed to respecting the environment and managing our operations in an environmentally responsible manner permeates all aspects of our business and is supported by extensive environmental support systems.

We will make every effort to ensure that, as a minimum, we comply with all applicable laws and regulations relating to the environmental impact of our operations and maintain procedures to notify local authorities in the event of an environmental accident.

You should actively seek innovative opportunities to reduce the environmental impact of Opal's operations and products, including through ethical sourcing.

### 5. Breaches of the Code

If you are concerned that an action has been taken or a decision has been made that is inconsistent with this Code, please raise your concerns with your manager. If your concern relates to your manager or this is otherwise not appropriate, questions or concerns can be raised with a more senior manager.

Where the issue is regulated by an Opal policy, you may report your concerns in accordance with that policy.

You may also report conduct in accordance with Opal's Whistleblower Policy.

Concerns can be raised with:

- the Chief People Officer if the matter concerns human resources personnel or a manager;
- the Chief Executive Officer or Company Secretary if the matter concerns a senior manager, executive or director;
- the Chairperson of the Board if the matter concerns the Chief Executive Officer; or
- to any director of the Board if the matter concerns the Chairperson of the Board.

All issues involving senior managers or human resource managers will be dealt with in accordance with this Code or an applicable policy.

Any determination about whether there has been a breach of this Code will be made in accordance with any other relevant policies and procedures, and after considering all of the circumstances, including any explanation provided by those involved.

Where there has been a breach of this Code, disciplinary or other action may be taken, up to and including termination of the Worker's employment.