



MODERN SLAVERY STATEMENT 2024



OUR FY2024 ANNUAL REPORTING SUITE

We produce a suite of reports to meet the needs of our stakeholders. Unless stated otherwise, all monetary amounts within the reports are subject to rounding and reported in Australian dollars (AUD).



FY2024 Annual Report

Overview of our company, strategy, and financial and non-financial performance over the financial year.



FY2024 Climate Action Report

Overview of our approach to climate change, including our governance processes, strategy, risk management, metrics and targets.



FY2024 Corporate Governance Statement

In accordance with the ASX Corporate Governance Council's Principles and Recommendations (4th Edition).



FY2024 Tax Transparency Report

Overview of our approach to tax, governance structure and tax position.

The following documents are available at orica.com/investors: Full-year results investor presentation and Full-year results ASX announcement, our FY2024 ESG Data and Frameworks Pack containing detailed data and reporting indices such as our Global Reporting Initiative (GRI) Index, Sustainability Accounting Standards Board (SASB) Index and Climate Action 100+ (CA100+) Net Zero Company Benchmark Index.

Enquiries about this report or our annual reporting suite can be directed to companyinfo@orica.com.



Learn more about our [annual report](#)



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Speaking up

Orica encourages everyone to speak up about things they think are wrong, against the law or that breach Our Code of Business Conduct ([Our Code](#)). Our online Speak Up service is available in multiple languages at orica.ethicspoint.com. For more information, please read our [Whistleblower Policy](#).

Throughout this document, financial years are referred to as 'FY' followed by the pertinent year. For example, FY2024 refers to the financial year in which this document was developed.

MESSAGE FROM OUR MANAGING DIRECTOR AND CEO



Sanjeev Gandhi
Managing Director and Chief Executive Officer

Orica is committed to upholding human rights within our business and throughout the supply chain. We strive to enhance the ways we manage human rights issues, including working towards eradicating modern slavery. As an industry leader, we acknowledge our role and leverage our international presence to advocate for human rights throughout our network and the wider sector.

We are actively working to fulfil our commitment to address modern slavery. Our policies are informed by global human rights frameworks, such as the United Nations Universal Declaration of Human Rights and the key conventions of the International Labour Organization.

As a global company, we face various human rights and modern slavery challenges in the regions and industries we work and interact with. Our view is that businesses should respect human rights and act to ensure they are upheld.

This year, we have focused on the findings of our FY2023 enterprise-wide modern slavery risk assessment. We have embedded increased governance in our modern slavery working groups and expanded our due diligence programs.

We have revised our modern slavery risk management plan and our embedded risk assessment matrices to enable more rigorous reviewing of suppliers. This has supported

the expansion of our high-risk supplier management program. Our approach to training has also changed and we now deliver a staged program to broader groups within the business.

We acknowledge the intricacies associated with modern slavery and human rights concerns, and the need for ongoing vigilance. In FY2025, we will continue to implement an expanded strategy and program to meet the growing expectations of our stakeholders and regulators.

Sanjeev Gandhi
Managing Director and Chief Executive Officer



OVERVIEW

In FY2024, we acted on the findings of our risk assessment, and:

- Focused on improving the governance of our modern slavery working group and reviewed the group's representation across key areas of the business.
- Engaged more extensively with our high-risk suppliers, updating our modern slavery risk management plan and risk assessment matrices.
- Refreshed our modern slavery training package and expanded delivery beyond our supply chain team to broader groups throughout the organisation.
- Commenced in-region workshops to broaden our understanding of modern slavery, and appointed stream-leads across our supply chain and operations to drive regional key performance indicators aligned with our modern slavery deliverables.

Reporting entity

Orica's Modern Slavery Statement 2024 (Statement) is for the financial year commencing 1 October 2023 and ending 30 September 2024 (FY2024). This Statement is made pursuant to the *Modern Slavery Act 2018* (Cth) (the Australian Act), the *Modern Slavery Act 2015* (the UK Act), the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Canadian Act) and published in line with the *Norwegian Transparency Act* (the Norwegian Act). It has been approved by the Board of Orica Limited and the Board of Orica Mining Services Pilbara Pty Ltd.

Forward-looking statements

Disclaimer: This report contains information that is based on projected and/or estimated expectations, assumptions or outcomes. Forward-looking statements are subject to a range of risk factors. Orica cautions against reliance on any forward-looking statements due to the volatility and uncertainty of the geopolitical and economic landscape. Orica has prepared this information based on current knowledge and good faith, understanding that there are risks and uncertainties involved which could cause results to differ from projections. Orica

will not be liable for the correctness and/or accuracy of the information or any differences between the information provided and actual outcomes, and reserves the right to change its projections from time to time. Orica undertakes no obligation to update any forward-looking statement to reflect events or circumstances after the date of this report, subject to disclosure obligations under the applicable law and ASX Listing Rules.



OUR STRUCTURE AND BUSINESS

Orica is one of the world's leading mining and infrastructure solutions providers. From the production and supply of explosives, blasting systems, specialty mining chemicals and geotechnical monitoring to our cutting-edge digital solutions and comprehensive range of services, we sustainably mobilise the earth's resources.

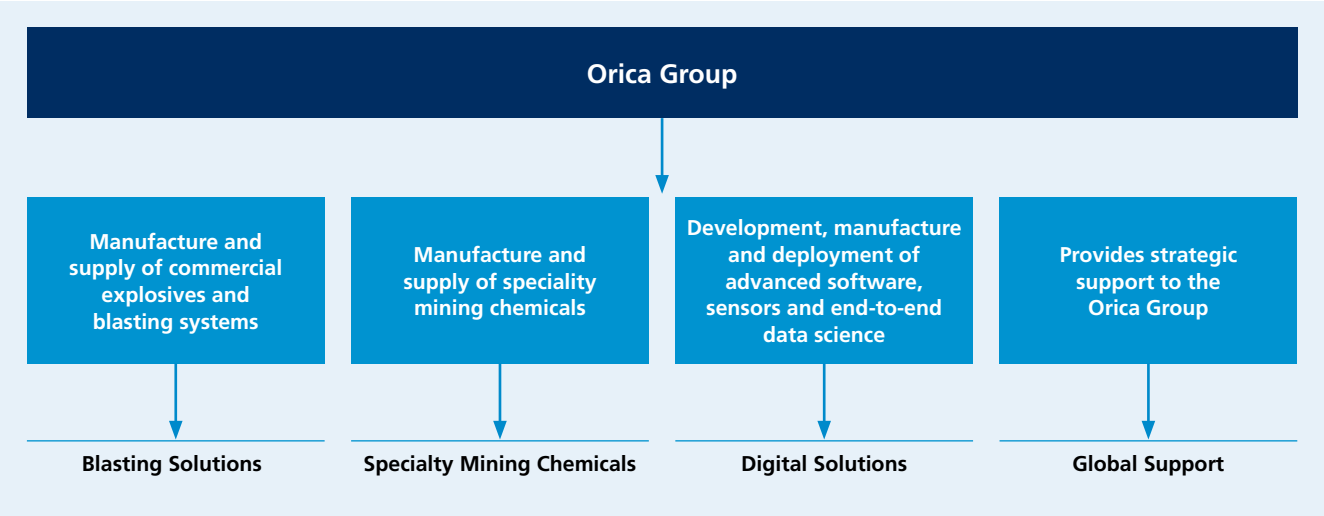
Our global network comprises continuous and discrete manufacturing operations,

technical and monitoring centres, and support offices. A network of joint ventures, ammonium nitrate emulsion (ANE) plants and bulk depots are strategically located to serve our customers around the world.

Orica Limited is the sole parent company of the Orica group of companies (being all those entities controlled by it at year end or from time to time during the financial year) (Orica Group). Its headquarters are in

Melbourne, Australia and it is listed on the Australian Securities Exchange (ASX: ORI).

Our business is organised into segments based on the internal management structure as reported to the Group's chief operating decision-maker (the Group's Managing Director and CEO). For further details refer to the Financial Report included in the FY2024 Annual Report.



Our values

As a purpose-led, responsible business, the ways we deliver value for our customers, communities and other stakeholders are as important as what we deliver. With a strong focus on safety, respect and integrity we are guided to ensure we contribute positively to our communities, act ethically and ensure we demonstrate care, and appropriately manage the risks we face in our operations and supply chain.



Safety is our priority. Always.

The most important thing is that we all return home safely, every day.



We respect and value all.

Our care for each other, our customers, communities, and the environment builds trusted relationships.



Together we succeed.

Collaboration makes us better, individually and collectively.



We act with integrity.

We are open and honest, and we do what is right.



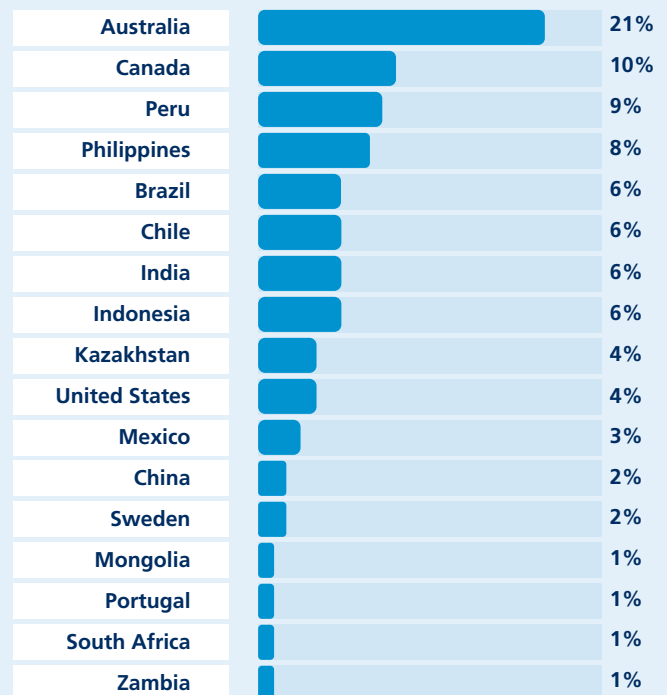
We are committed to excellence.

We take accountability for our business and for delivering outstanding results.

Our people

As of 30 September 2024, Orica's global workforce comprised 14,000+ employees. Approximately 90% of our workforce is located in 17 countries, as shown in the chart.

Our diverse team operates globally and includes engineers, project managers, administrative staff, client service representatives, process technicians, field operatives, and maintenance and logistics staff working in field and corporate settings. Our contingent workforce is primarily engaged in operations within our production and distribution hubs.



98.7%

Permanent full-time

7.1%

Fixed-term

31.1%

Covered by agreements

1.3%

Permanent part-time

0.2%

Casual

21.6%

Female workforce participation

Our supply chain and operations

Our operations are supported by a dynamic and complex global supply chain that procures goods and services in the following categories:

Category	Description of goods and services
Continuous manufacturing	Bulk materials, primarily ammonium nitrate, ammonia, sodium cyanide, emulsifiers, caustic soda and gas.
Discrete manufacturing	Individual componentry used as raw materials for the production or assembly of blasting systems or procured as products to be used at mine sites.
Corporate	Support products and services, including information technology, software and hardware, travel and consultants.
Indirect	Products and services procured to support operations, including maintenance, repair and operations services.
Logistics	Services and products supporting the movement of products.

Our regions primarily conduct their own purchasing, obtaining products and services from local and international suppliers.

In FY2024, products and services were procured from more than 14,000 suppliers in 88 countries.

At Orica, we aim to engage with suppliers that share our dedication to excellence, embody our values, are devoted to conducting business ethically, and scrutinise their environmental and social impact. In collaboration with our vendors, we are committed to addressing sustainability challenges and utilising enhancement strategies where deficiencies or risks emerge.

OUR STRUCTURE AND BUSINESS

High-spend countries

Countries in which Orica has the highest procurement spend¹ are presented on the map with an overlay of the locations of our operations.

The map includes data for countries that represent our areas of operation and key spend categories and allocates a global slavery index score (GSI) that estimates the level of vulnerability to modern slavery per country, across five risk-variables: governance, lack of basic needs, inequality, disenfranchisement and the effects of conflict. Vulnerability scores range from one to 100, with higher scores indicating increased vulnerability. Data is based on the findings of Walk Free, the International Labour Organization (ILO) and the International Organization for Migration (IOM).



Legend



Spend categories

- 1 Inorganic oxides
- 2 Chemicals
- 3 Road cargo transport
- 4 Marine transport
- 5 Rail transport
- 6 Additives
- 7 Resins
- 8 Industrial manufacturing/machinery
- 9 Explosive materials
- 10 IT consultant services
- 11 Services emulsions
- 12 Mining/quarry equipment
- 13 Initiating system caps/detonators

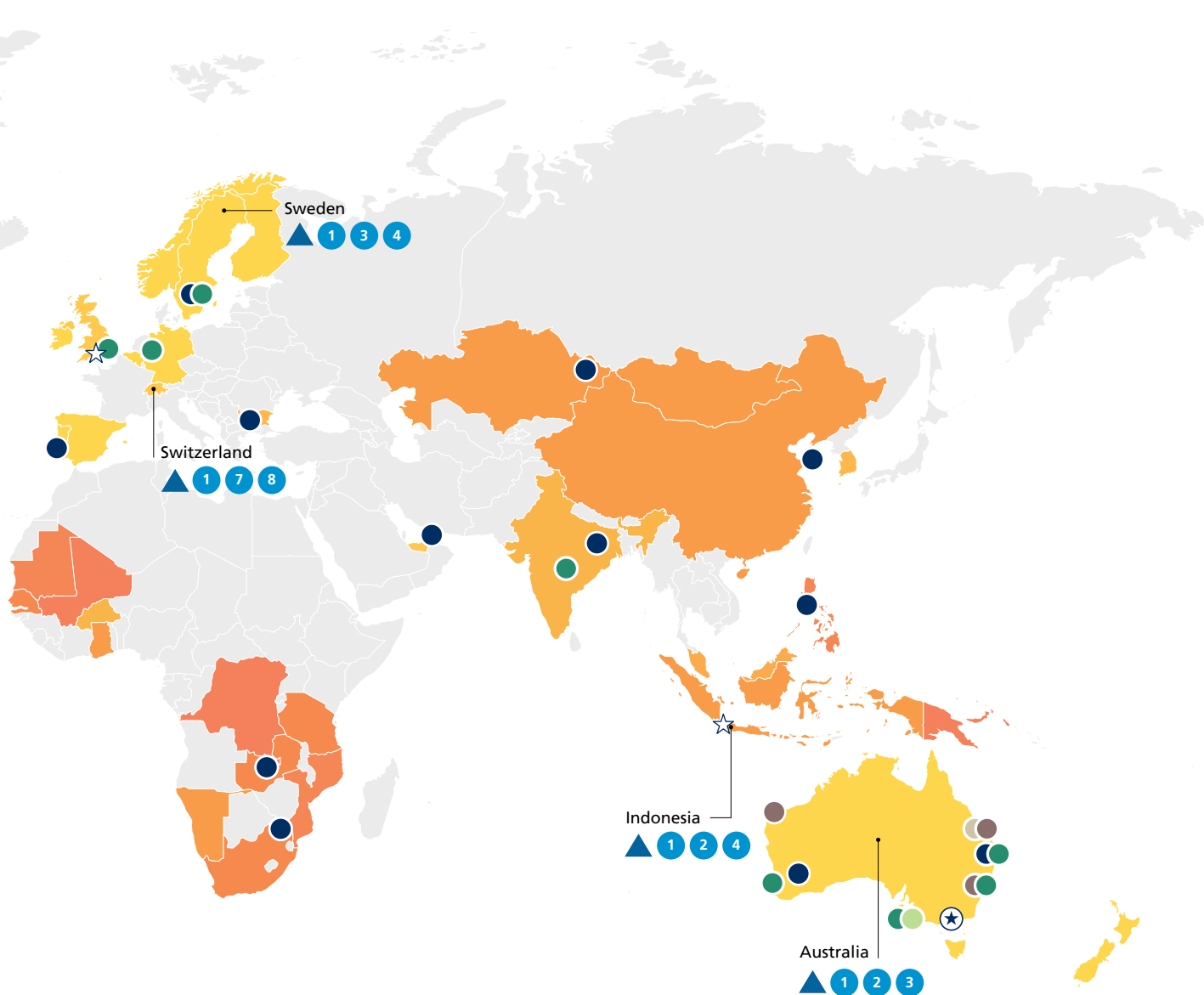
Major operations

- ★ Head office
- ☆ Regional head office
- Technology innovation centre
- Discrete manufacturing for initiating systems and packaged explosives
- Continuous manufacturing ammonium nitrate plant
- Continuous manufacturing sodium cyanide plant
- Emulsifier manufacturing plant
- ▲ High-spend country

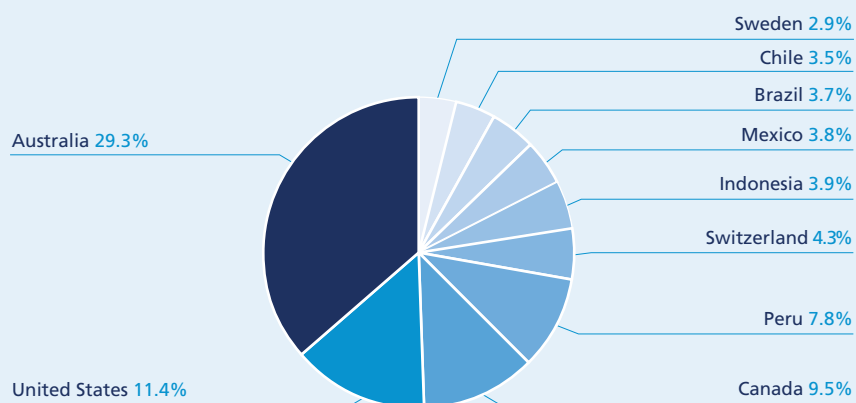
Total spend
\$4.9bn

Number of suppliers
14,000+

1. Top 10 countries representing approximately 80% of FY2024 total spend. Country spend is based on information in our global ERP system which may reflect the location of the corporate entity/offices and may not reflect the actual location of the products and services. The inherent risk of products and services, in addition to the industry sector, is considered in assessing risk exposure.



High-spend countries¹ (% of FY2024 total spend)



IDENTIFYING RISK

We are guided by the *Australian Modern Slavery Act 2018* which defines modern slavery risk as the risk of people experiencing conditions of modern slavery and the risk of the business contributing to the harm of people.

Modern slavery risk assessment

This year, based on the results of the FY2023 assessment, we expanded our modern slavery action plan, which determines our approach to due diligence, supplier engagement, capacity building and remediation activities for the high-risk areas identified.

We monitored and reported on the progress and outcomes of the action plan to our senior management group and Board.

We also completed a high-level review of the company's human rights risks, with the aim of incorporating the findings into a revised human rights policy and renewed approach to risk.

The review will inform the ways we update our human rights risk identification methodology and prioritise high-risk activities that require specific modern slavery due diligence in addition to standard due diligence.

We plan to complete an enterprise-wide modern slavery risk assessment every three years, which will allow time for meaningful review, measurement and improvement.

Risk assessment methodology

We draw on reputable sources, such as the International Labour Organization's Global Estimates of Modern Slavery¹, the International Trade Union Confederation's Global Rights Index² and the Walk Free Global Slavery Index³ in assessing modern slavery risk in our operations, supplier spend, commodities, industries and geographies.

We also consider our own risk management methodologies and seek feedback from internal stakeholders.

Potential risks in our operations

Our risk assessment revealed the likelihood of a lower risk of modern slavery elements in our direct workforce due to human resources policies and procedures. However, we acknowledge that our contingent and temporary labour forces may be at risk of experiencing exploitation and modern slavery conditions. We have prioritised third-party labour as a key focus for our due diligence, risk management and remediation processes in FY2025.

We continue to implement our new country entry process that includes a comprehensive analysis of human rights and modern slavery risks prior to expanding into new markets. Additionally, we conduct ongoing reviews and are implementing tools to monitor and address changes in risk profiles of countries where we operate, ensuring we continue to mitigate risks associated with those countries, including human rights risks.

Table: Modern slavery risk by location/situation

Areas of focus	Modern slavery risk factors
Operations and/or offices in countries with heightened human rights risks	Risks associated with workforce and onsite contracted labour, including deceptive recruitment, underpayment of wages, health and safety concerns. High-risk geographies (inherent risk⁴) Operations: Peru, Indonesia, Mexico, Brazil, Ghana, Kazakhstan, Colombia, Philippines, Democratic Republic of Congo and India.
Manufacturing sites	Risks associated with workforce and onsite contracted labour, including lack of visibility around indirectly hired and temporary workers, and health and safety concerns. High-risk geographies (inherent risk) Manufacturing (continuous and discrete): Indonesia, Brazil, China, Colombia, India, Kazakhstan, Mexico and Peru.
Non-operated joint ventures and equity investments in countries with increased human rights risks	Risks associated with lack of oversight and operational control: Orica may be unknowingly linked to adverse impacts.
Mergers and acquisitions activity	Risks associated with entering geographies with high modern slavery risks.
Customers operating in countries with increased human rights risks	Risks associated with entering geographies with high modern slavery risks.
Contractors and subcontractors	Risks associated with complex layers of subcontracting and lack of transparency, encouraging exploitative labour practices, including underpayment of wages, and health and safety concerns. Risks related to workers in certain areas of service provision, such as cleaning, logistics and security.

1. International Labour Organization, 2022 ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage.

2. International Trade Union Confederation Global Rights Index, 2023 ituc-csi.org/ituc-global-rights-index-2023.

3. Walk Free Global Slavery Index, 2023 walkfree.org/global-slavery-index/.

4. High-risk countries have been defined using a risk assessment tool that overlays the external data sources noted in 'Risk assessment methodology' with revenue.

Supply chain risk

We assess the risks in our global supply chain and focus on our engagement with suppliers. We categorise our suppliers based on their country of incorporation and category of supply, as these are the main factors that influence exposure to modern slavery. Further due diligence and engagement with higher-risk suppliers are prioritised based on spend.

Sub-contracted or third-party labour introduces complexity into our supply chain and may have a higher risk of modern slavery exposure. Our risk assessment model considers the use of sub-contracted labour and where risk is identified, we apply an additional risk matrix to inform the level of risk associated with a particular supplier.

Table: Modern slavery risk by category of supply⁵

Category of supply		Modern slavery risk factors	Higher-risk countries ⁶
Bulk (raw, including chemicals)		Inherent risk of forced labour based on mining and minerals industry, and common countries, including human trafficking and child labour.	➤ Indonesia ➤ Mexico ➤ Peru
Polyvinyl Chloride (PVC)		Inherent risk of forced labour based on manufacturing industry and common countries, including limited labour rights available to workers, forced labour and servitude.	➤ Brazil ➤ China ➤ India
Manufacturing components and assembly		Inherent risk of forced labour based on manufacturing industry and common manufacturing countries, including limited labour rights available to workers, deceptive recruiting and debt bondage.	➤ China ➤ India ➤ Indonesia ➤ Mexico
Electronics		Inherent risk of forced labour based on manufacturing industry and common manufacturing countries, including limited labour rights available to workers, deceptive recruiting and debt bondage. Prevalence of high-risk materials such as lithium and gold.	➤ China ➤ Indonesia ➤ Kazakhstan
Personal protective equipment (PPE) and safety equipment		Inherent risk of forced labour based on manufacturing industry and common manufacturing countries, including debt bondage and deceptive recruitment. Recent modern slavery accusations in Malaysia have been documented by institutions including the Australian Human Rights Commission.⁷	➤ Brazil ➤ India ➤ Malaysia ➤ Mexico

Category risk

In FY2023, we identified high-risk raw minerals and materials, such as cobalt and PVC, being used in our production processes. We recognised the need to engage with our stakeholders across our supply chain to manage these risks effectively.

In FY2025, we will prioritise the investigation of category risk in each region, acknowledging that different regions may face unique challenges and opportunities in addressing modern slavery issues. We are working closely with our regional teams to support them in this process.

5. Category risk based on external research reports including Verité® Commodity Atlas, US Trafficking Victims Protection Reauthorization Act, List of Goods Produced by Child Labor or Forced Labor and US Trafficking in Persons Report.
6. A selection of our higher-risk countries. Geographic risk has been assessed based on external sources, including the Global Slavery Index and Global Rights Index. This table does not take into account proportion of spend across geographies.
7. Australian Human Rights Commission, 'Modern Slavery in the Health Services Sector', 2021, humanrights.gov.au/our-work/business-and-human-rights/publications/modern-slavery-health-services-sector.

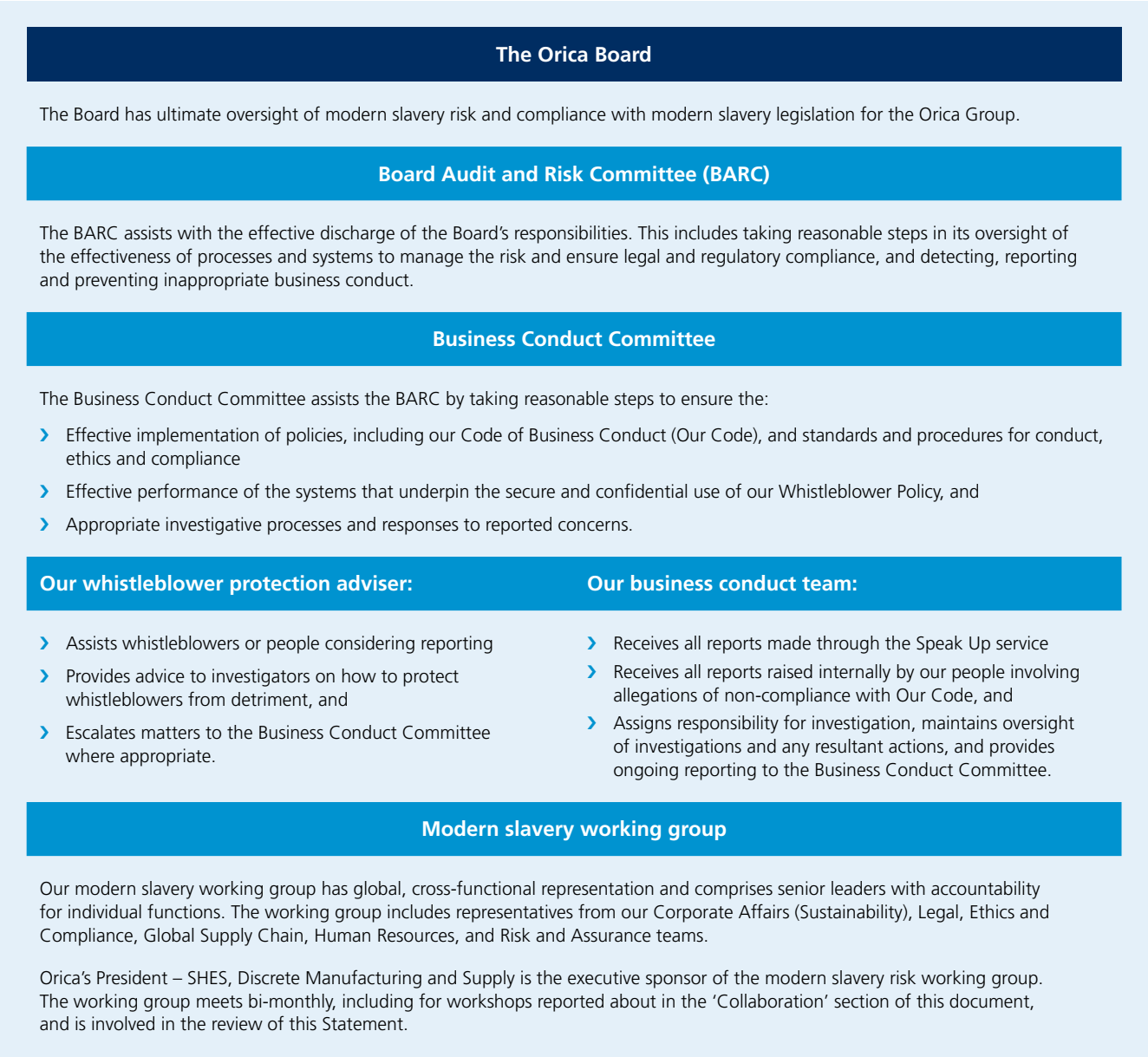
RISK MANAGEMENT AND REMEDIATION

We are committed to protecting and promoting the human rights of our employees and people affected by our business activities. The governance structure and policies that support the measures we have taken highlight our commitment to ethical, safe and sustainable operations.

Modern slavery governance

The Orica Board, through the Board Audit and Risk Committee, has oversight of material risks, including ethics and compliance risks that capture modern slavery. The Board reviews and approves our Modern Slavery Statement annually.

Our modern slavery governance structure is outlined below.



Policies

Our goal is to carry out periodic reviews as required to confirm that our policies continue to address the changing risk environment and remain effective.

In FY2024 we completed a review of our Human Rights at Work Policy and will integrate the changes from FY2025.

The table below outlines the key policies that form our strategy for managing the risks associated with modern slavery. In addition, we have policies that address sustainability, anti-harassment, diversity and inclusion, and anti-bribery and corruption.

Policy	Policy details
Code of Business Conduct (Our Code)	Applies to anyone who works for, or on behalf of Orica, including directors, officers, employees, contractors, suppliers and consultants, and is based on our values, including our commitment to respect and value all.
Human Rights at Work Policy	Sets out the core principles everyone must abide by to protect the rights of individuals, and applies to our business and all third parties we deal with.
Whistleblower Policy	Describes our process for receiving and managing whistleblower reports, the protections available to potential whistleblowers, and features information about our independent Speak Up service.
Safety, Health, Environment and Security (SHES) Policy	Establishes our commitment to safety, health, environment and security, provides guidelines to empower people to stop unsafe work, encourages compliance with all relevant SHES legislation, and promotes continuous improvement of SHES performance.
Responsible Sourcing Statement	Outlines our expectations of suppliers regarding ethical behaviour, human and labour rights and the management of social and environmental impacts.

View our policies at orica.com/governance.

Training

All employees and relevant contractors are subject to the requirements of Our Code and must complete mandatory training when joining Orica. We also provide mandatory periodic refresher courses throughout the employment life cycle.

We have provided a revised two-part modern slavery training program to all supply chain roles with relevant exposure or responsibility. Training has also been provided to Orica Directors, the Executive Committee and relevant teams within Human Resources.

In addition to building awareness, the training is intended to support our people's review and understanding of our supplier assessment questionnaire, and help them identify risks and assign actions based on supplier responses. The training covers

internal and external aspects of modern slavery risk management. The internal aspect focuses on our modern slavery risk management plan and the processes that must be followed in the source-to-contract life cycle and when anyone is introduced to and using Orica's systems.

The external aspect provides information relating to current legislation, types of modern slavery, ways to identify risks, responsibilities and where the biggest exposures lie. In FY2024, more than twice as many in the target group – compared to FY2023 – had completed the course.

We plan to expand our training program in FY2025.



RISK MANAGEMENT AND REMEDIATION

Managing potential risks in our operations

Human rights in the workplace

At Orica, our employee labour risks are managed by the Human Resources team. The team ensures our workers are offered contracts and benefits that reflect the standards of local markets. Our commitment is encapsulated in our Human Rights at Work Policy, which describes our stance on human rights and dedication to ensuring fair remuneration and work hours, adherence to employment laws and obligations (including the prohibition of forced or child labour) and an environment devoid of discrimination and harassment.

Safety

Safety is our number one priority at Orica. We have various programs in place, such as our Major Hazard Management (MHM) program, to ensure essential safety measures and validation processes are implemented. We authorise all employees, including contractors, to stop work immediately if they suspect a potential hazard. Additionally, we consistently share MHM stoppages and investigation results to promote a strong safety culture.

We closely monitor health, safety and environmental concerns in all areas of our business. As the handling, manufacture and transport of explosives contain the most significant hazard potential, comprehensive standards and best practices have been established to continuously reduce the risk of accidents. Transport equipment used in the company's operations are designed in accordance with the Orica Group's internal standards, and national and international regulations for dangerous goods vehicles.

Our safety management systems and actions taken are reported in our FY2024 Annual Report.

Business partner selection

Orica's policies require that before engaging a business partner – defined as 'any person or entity that interacts with other parties on behalf of Orica or Orica-controlled entities' – due diligence activities are undertaken internally to identify critical operational, security, compliance and reputational risks.

Our Ethics and Compliance team conducts a screening process. If any business partners are deemed to be high-risk, they may

undergo more thorough due diligence. This includes comprehensive examination of criminal, regulatory and civil records, and media searches for potential human rights violations. Before engaging a high-risk business partner, consent from the Ethics and Compliance manager for the relevant region is required. The manager will also recommend additional steps for minimising any identified risks.

Orica's policies require that appropriate clauses for managing modern slavery, anti-bribery and corruption, trade sanctions anti-bribery and corruption, and trade sanctions compliance must be included in all business partner contracts. These include the right to audit business partner compliance and terminate a contract in the event of a breach.

Business partners in high-risk countries

Our Ethics and Compliance team conducts periodic reviews of business partners in high-risk countries to ensure each has undergone appropriate due diligence.

In FY2024, our Ethics and Compliance team's review in West Africa identified a small number of business partners providing non-employee labour.

While there was no evidence of modern slavery, it was decided that the associated non-employees would be offered Orica employment contracts to ensure transparency in remuneration, coverage under Orica policies and access to Orica systems.

We recognise that third-party labour can present a higher risk of modern slavery and that, where possible, direct employment can significantly lower this risk.

Contingent labour risks

This year, we made a concerted effort to focus on the modern slavery risks presented by third party and contingent labour groups. We reviewed our cross-functional approach to managing risk and brought together our human resources and supply chain teams to develop clear policies and guidelines for engagement.

In FY2025 we will specifically focus on higher-risk locations and roles as we aim to:

- Improve oversight and assess controls to mitigate the risk exposures of our non-employee worker population and service-providers
- Strengthen our policies and procedures to ensure consistency across regions, and
- Ensure support and resources are available in local languages, and that we foster a culture of respect for human rights and increased awareness of modern slavery risks.

Acquisition risks

When engaging in an acquisition, we conduct ethics and compliance due diligence to understand and manage associated risks. We assess the geographies in which:

- Rental and sales activities are conducted
- Equipment is manufactured, and
- Exclusive distributors are used.

We made two acquisitions during FY2024: the Terra Insights Group, located throughout Canada, United States, United Kingdom and Switzerland, and Cyanco, located in United States and Canada.

New country entry risks

Our new growth opportunities may be present in countries with heightened operational, security, compliance and reputational risks. One of the measures we have in place to manage these potential risks is our new country entry procedure which is applied prior to:

- Entering customer relationships in a country where Orica has not conducted sales in the previous two years, and
- Establishing a presence in a country where Orica does not have a presence, including creating an entity, locating human resources (including contractors) or establishing a new facility.

The new country procedure involves a risk assessment and endorsements by a governance committee for entry into countries of higher risk. The committee will consider and assess specific risks, including modern slavery and human rights risks, before final approval is sought.

Internal audit function

The role of the internal audit function is to provide independent and objective assurance in alignment with Orica's strategy and risk management framework. The function conducts audits on the controls we have in place for managing environmental, social and governance (ESG) risks and opportunities.

Our Modern Slavery program is supported by various business functions including our internal audit function. In FY2024, focus areas were informed by the FY2023 ESG internal audit, where a component of the scope identified opportunities for improvement with the implementation of our modern slavery controls, oversight and accountability.

Moving forward, and where relevant, a modern slavery component will be considered in the annual internal audit plan as part of individual audits.

Managing supply chain risks

Our supplier selection process includes qualification procedures relating to safety, sustainability, compliance and performance criteria.

Orica's standard processes require that a forced labour clause be included in all supplier contracts outlining our expectations that suppliers:

- Have appropriate policies in place and conduct appropriate training relating to modern slavery
- Use all reasonable endeavours to prevent and respond to modern slavery, and
- Have adequate procedures and mechanisms in place for reporting instances or suspected instances of modern slavery.

Due diligence

Across our operations, our supply chain personnel are supported by our modern slavery risk management plan. The plan provides detailed advice and tools for detecting and addressing modern slavery risks during procurement, and – based on

a supplier's risk assessment – specifies the method, timing and frequency of required due diligence tasks.

We evaluate suppliers through our modern slavery self-assessment questionnaire and pre-qualification audits, which may involve onsite inspections before an agreement is formed. Audits are conducted by our employees with assistance from local teams. Moreover, we have strong pre-qualification evaluations in place prior to incorporating any materials or products into our operations. Suppliers must implement a plan for corrective action in the event any concern relating to modern slavery arises.

Expanded high-risk supplier audit program

The self-assessment questionnaire assists in the assessment of residual risk¹ after a supplier's existing risk controls are considered and allows us to identify any need for further engagement with a supplier.

As a significant expansion of our work in FY2023, we issued self-assessment questionnaires to 242 suppliers in countries with an inherently higher risk of modern slavery, as identified by our internal modern slavery risk management plan: Brazil, Burkina Faso, China, Colombia, India, Indonesia, Kazakhstan, Mali, Mexico, Peru, Thailand and Vietnam. A response rate of 80 per cent was received. If a self-assessment questionnaire is not returned, the Orica supply manager will make a direct risk assessment and, if appropriate, an alternative supplier may be considered.

We will continue to address gaps identified in self-assessment questionnaire responses, as required in our modern slavery risk management plan by following up any area of concern with detailed action plans for each region.

Updated risk assessment matrix

Supplier management requirements were defined based on risk and criticality to Orica's business, and updated in our revised matrix mapped to our FY2023 spend. Assessment categories ranged from very-high, high and medium to low and very-low risk across each country and category.

A spend overlay was applied to very-high and high-risk categories. A higher spend overlay was then applied to high-risk geographies, regardless of category. The resulting supplier list was used as a template requiring self-assessment questionnaires and further follow-ups.

In FY2025 the thresholds will be reviewed based on industry advice. We will also explore platforms that may facilitate access to other methods of risk assessment.

Collaboration

We partner with industry stakeholders, clients, peers and official agencies to enhance our approach to modern slavery risk and foster positive outcomes for individuals affected by modern slavery.

In FY2024, Orica became a signatory to the United Nations Global Compact (UNGC), expanding on our founding country membership in Chile. In FY2025 we will submit the first report on the progress we have made in the implementation of the UNGC's principles on human rights, labour, environment and anti-corruption. The modern slavery working group has access to the UNGC training and resources platform that provides best-practice advice and collaboration opportunities with industry peers.

This year we were also represented at the inaugural NSW Anti-slavery Forum.

Workshops

In FY2024 we held a global cross-functional workshop addressing third-party and contingent labour. The aim of the workshop was to reflect on any improvements made to the processes and approaches throughout the year, and to discuss and determine ways to strengthen our approach in FY2025.

1. 'Inherent risk' is the risk present where no mitigation or controls are in place. 'Residual risk' is the risk that remains once efforts have been made to identify controls to manage risk.

RISK MANAGEMENT AND REMEDIATION

Remediation

Raising concerns

We encourage our employees, vendors, customers and communities to speak up when they see things that do not comply with Our Code or the laws under which the business operates.

Orica's Whistleblower Policy enables speak-up reports to be submitted confidentially through authorised channels and via an independently hosted and multilingual Speak Up service, available globally via a hotline and website. Reports can be made anonymously, and all reporters are protected from reprisals or detriment. The confidentiality of reports and the identity of reporters are maintained in accordance with applicable laws.

Over the reporting period we received a total of 254 reports.

There were no reports involving allegations of modern slavery or a failure to uphold human rights.

Additional information about our Whistleblower Policy and whistleblower reports can be found in our FY2024 Annual Report and FY2024 ESG Data and Frameworks Pack.

Investigating and providing remedy

All reports are taken seriously and acted on in accordance with our Whistleblower Policy and Our Code. In all instances, Orica identifies and complies with applicable laws.

Depending on the nature of the report, it may be investigated by an external provider or an authorised person within Orica. Investigations are undertaken by authorised and impartial investigators, independent of the business area and the person whose conduct is the subject of the report. Orica has a clear process for determining whether a report requires an investigation, the indicative steps for the investigation, and how the findings from the investigation will be documented and reported to relevant stakeholders, including the reporter if they have elected to be contacted. Where this is the case, Orica provides regular updates to the reporter on the progress and outcome of the investigation.

Where a potential situation involving modern slavery is identified, we are committed to acting in the best interests of impacted individuals and providing remedy where we have caused or contributed to the situation.

Remedy may be provided with the aim of making good any harms experienced by impacted individuals and taking steps to ensure the situation does not recur. Efforts are made to identify and address the root cause of the exploitation and consider appropriate changes required in our systems and processes to strengthen the prevention of exploitation.

Orica is not aware of any impact on vulnerable families as a result of steps taken to eliminate forced labour or child labour.

We are committed to continuous improvement of our investigation and remediation processes. Relevant data is analysed on a quarterly basis in view of industry benchmarks on report volumes, intake methods, anonymity rates, allegation categories, investigation timeframes and substantiation rates. Results are prepared at global and regional levels for internal review and, where trend analysis identifies emerging issues, action plans are established to identify and address root causes.



ASSESSING EFFECTIVENESS

We assess our approach to modern slavery using an internal framework and track our key commitments and goals.

We continue to review and assess the effectiveness of our policies, processes and procedures in line with emerging best practice. As our modern slavery approach matures, we will continue to update our methods for evaluating the effectiveness of our actions. We will concentrate on the next steps listed below in the next reporting period.

Method	Indicators	Actions	Next steps
Due diligence	Number and percentage of supplier self-assessment questionnaires issued, completed and assessed.	We track progress against our priorities to remain accountable for our initiatives. Response rates of high-risk supplier self-assessment questionnaire engagement are tracked. We received a response rate of 80 per cent in FY2024.	- Expand self-assessment questionnaire program and enhance due diligence through the modern slavery risk management plan - Review our approach to category risk management - Review our modern slavery clauses and engage the business to support delivery - Lead a review and support regional working groups to improve management of third-party labour - Enhance education and controls, and - Engage and plan for third-party audit.
Grievance mechanism monitoring	- Number of grievances by reporting channel. - Category of report raised. - Number of substantiated reports.	The Ethics and Compliance team function is responsible for our global whistleblower approach. We monitor whistleblower reports to track emerging themes and issues related to modern slavery. Reports in FY2024 were primarily in relation to bullying and harassment, conflict and inappropriate behaviours.	Enhance our initiatives to promote recognition of our whistleblower hotline throughout our operations and supply chain.
Training	- Number and percentage of employees that complete training. - Feedback from staff and suppliers about training.	We deliver training on modern slavery awareness and our processes to address modern slavery risks and impacts to key employees across our business. Training completion rates are tracked.	- Expand training program beyond key personnel to broaden education and awareness across the business - Plan for and prepare multi-lingual options of our modern slavery training package, and - Leverage and engage our membership with the UNGC to provide training opportunities for key personnel.
Orica's business function activities, including internal auditing	- Number of modern slavery working group meetings. - Number of audit outcomes actioned related to human rights and modern slavery.	Different teams across the business contribute to assessing the effectiveness of our modern slavery actions. Our internal audit function assesses our internal business controls and processes, including alignment to procurement standards across our regional procurement functions. In FY2024, we updated our modern slavery working group terms of reference and held meetings bi-monthly. All audit actions from FY2023 were actioned. Refer to page 14 for further detail on internal review.	- Update and refresh our Human Rights at Work Policy - Integrate specific human rights risk indicators into existing risk appetite framework, and - Review global human resources policies.

CONSULTATIONS

Orica operates and is managed as a group of affiliated entities with overarching policies, standards, systems and processes that are designed to be applied consistently to our controlled entities. In accordance with our operating model, we engaged with:

- Our modern slavery working group, that includes representatives from our Ethics and Compliance, Global Supply Chain, Legal, Risk and Compliance, Finance, Human Resources and Sustainability teams.
- Each of the reporting entities covered by this Statement to confirm the alignment of due diligence processes across the business (noting that some reporting entities are part of the Orica Group and operate as a consolidated group supported by various functional teams such as our Global Supply Chain).
- Regional teams, including regional supply chain teams.
- Key internal stakeholders to address the FY2023 risk assessment findings.

Prior to submission to the Board for review and approval, this Statement was reviewed by each member of the modern slavery working group: General Counsel – Corporate, Chief Communications Officer, Vice President – Corporate Affairs, Head of Sustainability, Company Secretary and President – SHES, Discrete Manufacturing and Supply.

This Statement has been approved by the following Boards:

- Orica Limited on behalf of the reporting entities other than Orica Mining Services Pilbara Pty Ltd on 13 November 2024, and
- Orica Mining Services Pilbara Pty Ltd on 13 November 2024.



Sanjeev Gandhi
Managing Director and
Chief Executive Officer
Orica Limited



Germán Morales
Chairman of the Board
Orica Mining Services
Pilbara Pty Ltd

Reporting entities

This is a joint statement comprising the following reporting entities under the Australian Act (Reporting Entities), referred to as 'we', 'us', 'our' or 'Orica'.

Relevant reporting entities

Reporting entity	Activities of reporting entity	Location of reporting entity
Orica Limited (ACN 004 145 868), the ultimate holding company in the Orica Group	Corporate and support costs	Australia
Orica Investments Pty Ltd (ACN 009 781 257)	Corporate and support costs	Australia
Orica Australia Pty Ltd (ACN 004 117 828)	Manufacture and supply of commercial explosives and blasting systems	Australia
Orica Mining Services Pilbara Pty Ltd (ACN 158 151 369)	Manufacture and supply of commercial explosives and blasting systems	Australia
Orica Canada Inc (BN 867220899RC0005)	Manufacture and supply of commercial explosives and blasting systems	Canada

A full list of controlled entities in the Orica Group is included in Note 23 List of Controlled Entities in the FY2024 Annual Report. Orica Investments Pty Ltd is the holding company of many of our controlled entities (including overseas controlled entities) while Orica Limited is the immediate parent.

This Statement covers assets wholly owned and/or operated by Orica and those assets owned by joint ventures that are operated by Orica during the period 1 October 2023 to 30 September 2024. While we also hold interests in assets owned by joint ventures that are not operated by Orica, this Statement applies only to our operated assets, unless stated otherwise.

In accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) (Act) and, in particular, section 11 thereof, we attest that we have reviewed the information contained in the report for the entity or entities listed above. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

APPENDIX – DISCLOSURES MATRIX

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	Canadian Act mandatory reporting requirements	Norwegian Act mandatory reporting requirements	Location in this Statement
Identify the reporting entity and describe its structure, operations, and supply chains.	Organisation's structure, its business and its supply chains.	The company's structure, activities and supply chains.	A general description of the enterprise's structure, area of operations.	Pages 3–7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	The parts of the company's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.	Pages 8–9
Describe the actions taken by the reporting entity, and any entities the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking, and due diligence processes in relation to slavery and human trafficking in its business and supply chains.	The company's policies and its due diligence processes in relation to forced labour and child labour. Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains. Any measures taken to remediate any forced labour or child labour.	Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence.	Pages 10–14
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Organisation's effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	Information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.	Pages 14–15
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).				Page 16
	Training and capacity building on slavery and human trafficking available to its staff.	Training provided to employees on forced labour and child labour.		Page 11
Any other relevant information.				Throughout this Statement

