



2020 MODERN SLAVERY STATEMENT



CONTENTS

About this statement	1
A message from our CEO	2
Who we are	3
Our operations	4
Our business	6
Our commitment	7
Policies and procedures	7
Governance and oversight	8
Risk assessment and due diligence	9
Reporting, investigation and remediation	12
Assessing effectiveness	13



ABOUT THIS STATEMENT

Orica's Modern Slavery Act – Transparency Statement (**Statement**) is for the financial year commencing 1 October 2019 and ending 30 September 2020 (FY2020). This Statement is made pursuant to the *Australian Modern Slavery Act (Cth) 2018* (the **Australian Act**) and the *UK Modern Slavery Act 2015* (the **UK Act**) and has been approved by the Board of Orica Limited.

REPORTING ENTITIES (AUSTRALIAN ACT)

This Statement is a joint statement comprising the following reporting entities under the Australian Act (**Reporting Entities**), together referred to as we, us, our, Orica:

- Orica Limited (ACN 004 145 868) which is the ultimate holding company in the Orica Group
- Orica Investments Pty Ltd (ACN 009 781 257)
- Orica Australia Pty Ltd (ACN 004 117 828)
- Minova Australia Pty Ltd (ACN 084 965 962)
- Orica Mining Services Pilbara Pty Ltd (ACN 158 151 369).

A full list of controlled entities in the Orica Group is included in note 23 – Investments in Controlled Entities of the FY2020 Annual Report. Orica Investments Pty Ltd is the holding company of many of our controlled entities (including overseas controlled entities) and our immediate parent is Orica Limited.

This Statement covers assets wholly owned and/or operated by Orica and those assets owned as a joint venture operated by Orica during the period 1 October 2019 to 30 September 2020. While we also hold interests in assets owned as a joint venture but not operated by Orica, this statement regarding our operations, assets and values apply only to our operated assets, unless stated otherwise.

The table below sets out the mandatory reporting requirements in the Australian Act, the recommended criterion in the UK Act and where each has been addressed within this Statement:

Table 1: Reporting requirements

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	This statement
Identify the reporting entity and describe its structure, operations and supply chains.	Describe the organisation's structure, its business and its supply chains.	About this statement (pg. 1) Who we are (pg. 2) Our operations (pgs. 4-5) Our business (pg 6)
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Describe the 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.	Risk assessment and due diligence (pgs. 9-11)
Describe the actions taken by the reporting entity and any entities that the reporting entity owns or controls to assess and address these risks, including due diligence and remediation processes.	Describe its policies in relation to slavery and human trafficking. Describe its due diligence processes in relation to slavery and human trafficking in its business and supply chains.	Policies and procedures (pg. 7) Governance and oversight (pg. 8) Risk assessment and due diligence (pgs. 9-11) Reporting, investigation and remediation (pg. 12)
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Describe its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Assessing effectiveness (pg. 13)
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).		Consultation and approval process (pg. 14)
	Describe the training and capacity building about slavery and human trafficking available to its staff.	Training (pg. 12)
Any other relevant information.		A message from our CEO (pg. 2) Our commitment (pg. 7)



A MESSAGE FROM OUR CEO



Alberto Calderon
Managing Director and CEO

I am pleased to introduce our fifth Modern Slavery Statement, which, for the first time, addresses Modern Slavery requirements in both the United Kingdom and Australia.

Like all companies, Orica's strength lies in our people. As a truly global business, with operations in over 100 territories around the world, our teams work in very different environments and cultures, from our own manufacturing facilities, research centres and corporate offices, to supporting our customers at their mine sites.

But wherever we work, we are united in our belief that everyone, everywhere, has the right to a life free from any form of modern slavery.

The exploitation of other people for personal or commercial gain contradicts every one of our company values.

We recognise that Modern Slavery is a complex issue and we are committed to working in collaboration with peers, customers, government and non-government entities and advisors to address this challenge.

As you will read in this Modern Slavery Statement, our commitment to human rights is embedded in our Code of Business Conduct. We have identified areas of risk not just in our own operations, but also throughout our supply chain, with our Human Rights at Work Policy also applying to all third parties we deal with, including suppliers, customers, community partners and contractors. We have an independent confidential service for any stakeholder to report concerns, with the knowledge that they will be protected in accordance with our Whistleblower Policy. All reports are taken seriously and acted upon accordingly.

This commitment to protecting, upholding, and advancing human rights, across all our business activities, is underpinned by the requirement that all employees and contractors who are subject to the requirements of the Code of Business Conduct complete mandatory training on joining Orica and refresh training every two years.

This year, we established a multi-function working group, tasked with developing and implementing our Modern Slavery approach. This group is overseen by a robust and proactive Governance Structure, led from the top by our Board of Directors.

We know that there is always more work to do, and we will continue to evolve our approach.

This includes regularly reviewing the effectiveness of our Modern Slavery Risk Management Plan, and improving it wherever we can. We have identified a number of focus areas for the coming financial year, and we will report on our progress.



WHO WE ARE

Every day, all around the world, our people help mobilise the vital resources that are essential to progress.

We are a world leader in blasting and productivity solutions. From the production and reliable supply of explosives and initiation systems, to our suite of digital solutions and blasting services, we help extract and monitor resources safely, efficiently and responsibly. Our people – engineers, scientists, technologists, operators, business specialists and on-site crew – work together to support customers in large deep mines, underground operations, quarrying, construction, and oil and gas projects.

To facilitate sustainable business growth and deliver environmental and social benefits, we look for opportunities to make a positive impact. Our focus is on innovation and we continue to invest in new digital and automated technologies, offering safer solutions to our customers that increase productivity while managing social and environment impacts.

Fundamental to everything we do is the diversity and expertise of our people. We work as one team and are always guided by our values.

146 YEARS OF EXPERIENCE AND INNOVATION

CUSTOMERS IN MORE THAN 100 COUNTRIES

LEADING ASX INDUSTRIAL COMPANY

13,000+ EMPLOYEES

#1 GLOBAL SUPPLIER OF COMMERCIAL EXPLOSIVES

OUR VALUES



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 OPERATIONS

Our global network comprises manufacturing operations, technical and monitoring centres and support offices.

NORTH AMERICA

UNITED STATES



CANADA



MEXICO



★ UNITED STATES

★ ENGLAND

LATIN AMERICA

CHILE



COLOMBIA



BRAZIL



PERU



★ CHILE

Major Operations

- ★ Head Office
- ☆ Regional Head Office
- Customer Presence
- ⚙️ Technical/Monitoring Centre

- Ammonium Nitrate
- Initiating Systems/Packaged Explosives
- Sodium Cyanide

We also have a network of joint ventures, ammonium nitrate emulsion plants and bulk depots strategically located to serve our customers around the world.



EUROPE, MIDDLE EAST & AFRICA

- BULGARIA x1

- KAZAKHSTAN x1

- PORTUGAL x1

- RUSSIA x1

- SOUTH AFRICA x1

- SWEDEN ⚙️

- UNITED ARAB EMIRATES x1

- ZAMBIA x1

SINGAPORE ★

AUSTRALIA PACIFIC & ASIA

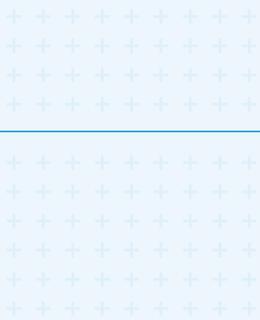
- AUSTRALIA ⚙️ x1 x2 x3

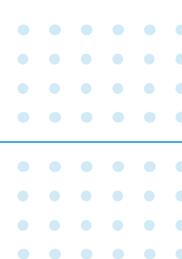
- CHINA x2

- INDIA x1

- INDONESIA ⚙️ x1

- THE PHILIPPINES x1

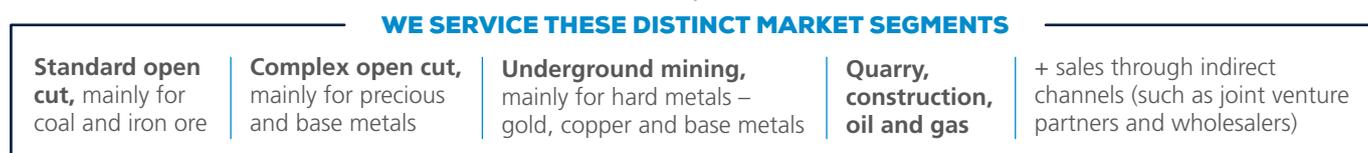
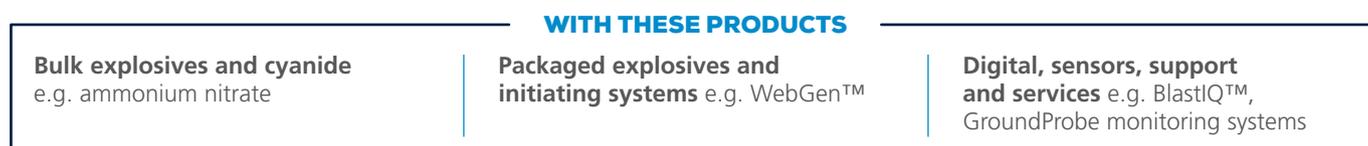




OUR BUSINESS

As an Australian-based business with a global footprint, our portfolio of manufacturing and distribution assets are strategically located across Australia Pacific, Asia, Europe, the Middle East and Africa, Latin America and North America.

We manufacture explosives and initiating systems and provide a comprehensive portfolio of specialised solutions to customers in four distinct market segments. Our solutions portfolio comprises the following products and services:



NON-OPERATED JOINT VENTURES AND EQUITY INVESTMENTS

We hold interests in assets that are owned as a joint venture but not operated by Orica.

We also invest in various sectors, including software development and technology, and the manufacture and sale of explosives. These investments are detailed in our FY2020 Annual Report, which can be found at <https://www.orica.com/Investors>.

OUR SUPPLY CHAIN

Our operations are supported by a dynamic and complex global supply chain, which includes the procurement of goods and services in the following categories:

Category	Description of goods and services
Continuous Manufacturing	Bulk materials, primarily ammonium nitrate, ammonia and gas.
Discrete	Individual componentry used as raw materials for the production or assembly of blasting systems or procured as products to be used at mine site.
Corporate	Support products and services, including IT 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.

In FY2020, we procured A\$2.8 billion worth of products and services from 13,500 suppliers in 48 countries around the world. 70 per cent of our spend is concentrated in 10 countries (Australia, Brazil, Canada, Chile, India, Indonesia, Mexico, Philippines, Sweden, and the United States of America).

Our suppliers play a critical role in our business. We seek to work with suppliers that share our commitment to excellence, are aligned to our values, and are committed to improving their environmental, social and ethical impact. We are committed to working collaboratively with our suppliers to address social, ethical and environmental sustainability challenges together.

Further information about our business is detailed in our FY2020 Annual Report.

OUR COMMITMENT

At Orica, how we do business is as important as what we do. As a global leader, we recognise the impact and influence of our actions, and seek to ensure we have a positive impact. This includes protecting, upholding, and advancing human rights across our business activities.

Our approach to human rights is set out in our Human Rights at Work Policy and our Code of Business Conduct (Our Code) and is based on internationally recognised standards and codes, including the Universal Declaration of Human Rights, the United Nations (UN) Guiding Principles on Business and Human Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. We are opposed to all forms of slavery, human trafficking and child labour.

We have a significant role to play in the global challenge to eliminate modern slavery. As a business we are developing our approach for the effective management of modern slavery risks and requirements, and we are committed to continuously improving this approach to ensure we protect people in our operations and supply chain.

POLICIES AND PROCEDURES

POLICY COMMITMENT

Our commitment to human rights is enshrined in Our Code and Human Rights at Work Policy.

Code of Business Conduct	Human Rights at Work Policy
<p>Our Code applies to anyone who works for, or on behalf of, Orica, and applies to directors, officers, employees, contractors, suppliers and consultants. It clearly outlines our expectations for individuals to understand and follow the specific requirements of Our Code, demonstrate our values, and comply with relevant laws and regulations and any additional Orica policies, standards or procedures.</p> <p>Our Code is shaped around our values including our commitment to Respect and value for all. We expect individuals and entities to which Our Code applies to ensure they:</p> <ul style="list-style-type: none"> • respect the rights of others • uphold human rights at work • work with and support our communities. 	<p>Our Human Rights at Work Policy applies to our business, and all third parties we deal with, including suppliers, customers, community partners and contractors, and sets out the core principles that applies to work locations in a global context.</p> <p>Our principles include the rights of individuals to:</p> <ul style="list-style-type: none"> • a workplace free of discrimination and harassment • a healthy and safe workplace • appropriate pay and working hours • freedom of association • collectively or individually bargain, and join, or not join, a legally recognised trade union or third party representative organisation • choose employment freely.

Our Code also provides information on grievance mechanisms available to report a concern or breaches to Our Code, including access to our independent, confidential and multilingual 24 x 7 Speak-Up service.





GOVERNANCE AND OVERSIGHT

Orica's Board, through the Safety, Health, Environment, Community and Security Committee (SHECS) and the Board Audit and Risk Committee (BARC), oversees our broader sustainability approach, and monitors compliance against our policies. The specific roles in monitoring our human rights and modern slavery performance are outlined below:

MODERN SLAVERY AND HUMAN RIGHTS GOVERNANCE FRAMEWORK

ORICA'S BOARD

The Board has ultimate oversight of legislative compliance for the Orica Group.

SAFETY, HEALTH, ENVIRONMENT, COMMUNITY AND SECURITY COMMITTEE

The SHECS Committee assists the Board in the discharge of its responsibilities to allow detailed consideration of health and safety, sustainability, community and security issues.

The SHECS committee has oversight of our SHECS management framework, systems and performance. The adequacy of our SHECS strategy and updates on performance are monitored quarterly, in addition to other scheduled meetings.

BOARD AUDIT AND RISK COMMITTEE

The BARC is a committee established by the Board to assist with the effective discharge of the Board's responsibilities in relation to the matters set out in its Terms of Reference. This includes reporting to the Board and taking reasonable steps in its oversight of:

- the adequacy of the processes and systems in place across the Orica Group to ensure legal and regulatory compliance; and
- the effectiveness of the processes and systems in place for detecting, reporting and preventing inappropriate business conduct.

BUSINESS CONDUCT COMMITTEE

The Business Conduct Committee enables management to assist the BARC by overseeing the promotion of Orica's values in our workplace culture, reporting to the BARC and taking reasonable steps to ensure:

- the development of policies (including Our Code), standards and procedures on conduct, ethics and compliance matters, are implemented and effective
- the adequacy and performance of the business conduct program, systems and procedures in enabling people to raise concerns confidentially and securely, and response or investigation to those concerns is appropriate and commensurate.

WHISTLEBLOWER PROTECTION ADVISOR

Our Whistleblower Protection Advisor:

- provides information and assistance to whistleblowers or people considering reporting;
- reviews and provides advice to investigators on how to implement practical steps to protect whistleblowers from detriment; and
- escalates matters appropriate to the Business Conduct Committee.

BUSINESS CONDUCT MANAGER

Our Business Conduct Manager receives all reports made through the Speak Up Service, and all reports received by Orica staff that involve allegations of non-compliance with the Code of Business Conduct must be referred to the Business Conduct Manager.

The Business Conduct Manager reviews all reports, assigns each to an appropriate responsible person for investigation, maintains oversight of investigations and any resulting actions and provides ongoing reporting to the Business Conduct Committee.

MODERN SLAVERY WORKING GROUP

Our Modern Slavery Working Group is comprised of senior leaders representing Corporate Affairs (Sustainability), Ethics and Compliance, Finance, Global Supply Chain, Human Resources, Legal, Risk and Assurance.

The Working Group is tasked with developing our approach to managing modern slavery risks across the Orica Group and has responsibility and oversight of day-to-day implementation of our approach within their individual business streams.

RISK ASSESSMENT AND DUE DILIGENCE

RISK MANAGEMENT FRAMEWORK

Our enterprise risk management framework provides for the ongoing identification, assessment and mitigation of material operating risks. This is conducted at sub-regional, region, business and functional levels and then aggregated into relevant profiles which are reviewed and agreed by operational and Executive Management teams. These risk profiles and our progress on any required mitigations against individual risks are reported bi-annually to the BARC.

In FY2020, no reports of alleged conduct that would constitute a breach of our Human Rights at Work Policy or the relevant laws (including modern slavery) were received or substantiated through our speak-up service. One report was made directly to management alleging discrimination and denial of a workplace right; however, this was investigated and the behaviour was not substantiated nor found to constitute a breach of any relevant policies or laws.

RISKS IN OUR OPERATIONS

We have a large global footprint with operations and offices across the world. As we conduct business activities in countries that have a heightened potential for modern slavery and adverse human rights impacts, a preliminary risk assessment was conducted identifying the following areas of risk:

Operational risk type	FY2020 risk profile
Operations and/or offices in countries with increased human rights risks	<p>We have operations and/or offices located in countries with increased human rights and modern slavery risks, including the Democratic Republic of Congo and Papua New Guinea. A review of due diligence and risk management processes in place within these operations/offices will be conducted.</p> <p>Additionally, we identified contracted or third-party labour within these countries as a risk. Although all on-site contractors operate under Orica policies, including Our Code, we have less direct visibility over the recruitment and employment terms of their workers. In countries with high human rights risk, or where workers may be temporary, migrant, or otherwise vulnerable workers, they may be susceptible to exploitation.</p>
Non-Operated Joint Ventures	We currently have a number of non-operated joint ventures. We will focus on further engagement with our JV operating partners to understand their existing approach to managing modern slavery risks, and opportunities for collaboration.
Equity Investments in entities operating in countries with increased human rights risks	We have a number of equity investments globally, with some of the entities we have investments in located in high-risk countries.
Customers operating in countries with increased human rights risks	Due to the nature of our product, we already have a significant risk assessment and screening process in place for customers as part of mitigating actions to address one of our material risks. We will review to determine whether modern slavery risks are adequately covered by existing risk management processes.

MANAGING RISKS THROUGH DUE DILIGENCE

Many of our new growth opportunities are in countries with increased operational, physical, compliance and reputational risk. Understanding and managing country risk before investing in a new or emerging market is critical to maintaining our license to operate, upholding our reputation, and appropriately managing legal and social risks.

Our country entry procedure is an important tool in identifying and managing our commitment to respecting human rights. Before selling into a country into which we have not conducted sales in the previous two-year period, either directly or via a third party (for example, an agent or distributor), or before establishing any presence in a country where we currently do not have a presence, a detailed submission and application must be made to an internal endorsement committee where potential risk, including that relating to human rights, is considered before final approval by the Chief Executive Officer and other relevant executives.

Each application must be supported by:

- an assessment of the full supply chain to the endpoint of consumption
- trade sanctions screening for customers and due diligence reviews for entities within the supply chain that may interact with other parties on behalf of Orica (e.g. sales agents, distributors and freight forwarders)
- a risk workshop and country risk assessment incorporating relevant commentary and intelligence about the target country, analysis of risk events and identification and assessment of the current Modern Slavery and Human Trafficking environment.



CASE STUDY

NEW COUNTRY ENTRY PROCEDURE

During the first half of FY2020, we investigated opportunities to operate in three countries where, at the time, we did not conduct business. Each new country was investigated using the New Country Entry procedure. As an outcome of the investigation, the following was determined in relation to one country:

- irrespective of the controls and processes we (and our customer) put in place, the risk of modern slavery, and bribery and corruption within the country was high and unable to be adequately controlled
- government response to modern slavery issues within the country to date had been poor, with little action to improve the situation.

While we elected to move forward with two countries, one was not endorsed for entry.

RISKS IN OUR SUPPLY CHAIN

Supply Chain Risk Type	FY2020 Risk Profile
Countries with increased human rights risks	<p>In FY2020, we procured \$2.8 billion in goods and services from 13,500 suppliers in over 48 countries.</p> <p>Of these, approximately 900 suppliers were identified as being located in high risk* countries. (For further information on locations, refer to Figure 1 on page 11.)</p>
Categories with increased human rights risks	<p>Our preliminary risk assessment identified that we procure the following goods with a higher risk of modern slavery:</p> <ul style="list-style-type: none"> • bulk (raw) materials, including chemicals • chemicals • electronics • component parts and consumables • personal protective equipment and safety gear. <p>We also procure the following services with a higher risk of modern slavery:</p> <ul style="list-style-type: none"> • transport and logistics (including road and sea freight) • facilities maintenance (including cleaning) • security services.

* High risk as identified by Orica's country risk score, developed using data from the Global Slavery Index, International Trade Union Confederation Global Rights Index, US Department of States Trafficking in Persons Report, and Unicef's Child Labour data.

In FY2021, we will look to expand our risk assessment approach – refer to our Looking Ahead section on page 13 for additional detail.

ORICA HIGH RISK SUPPLIERS (BY COUNTRY OF INCORPORATION)

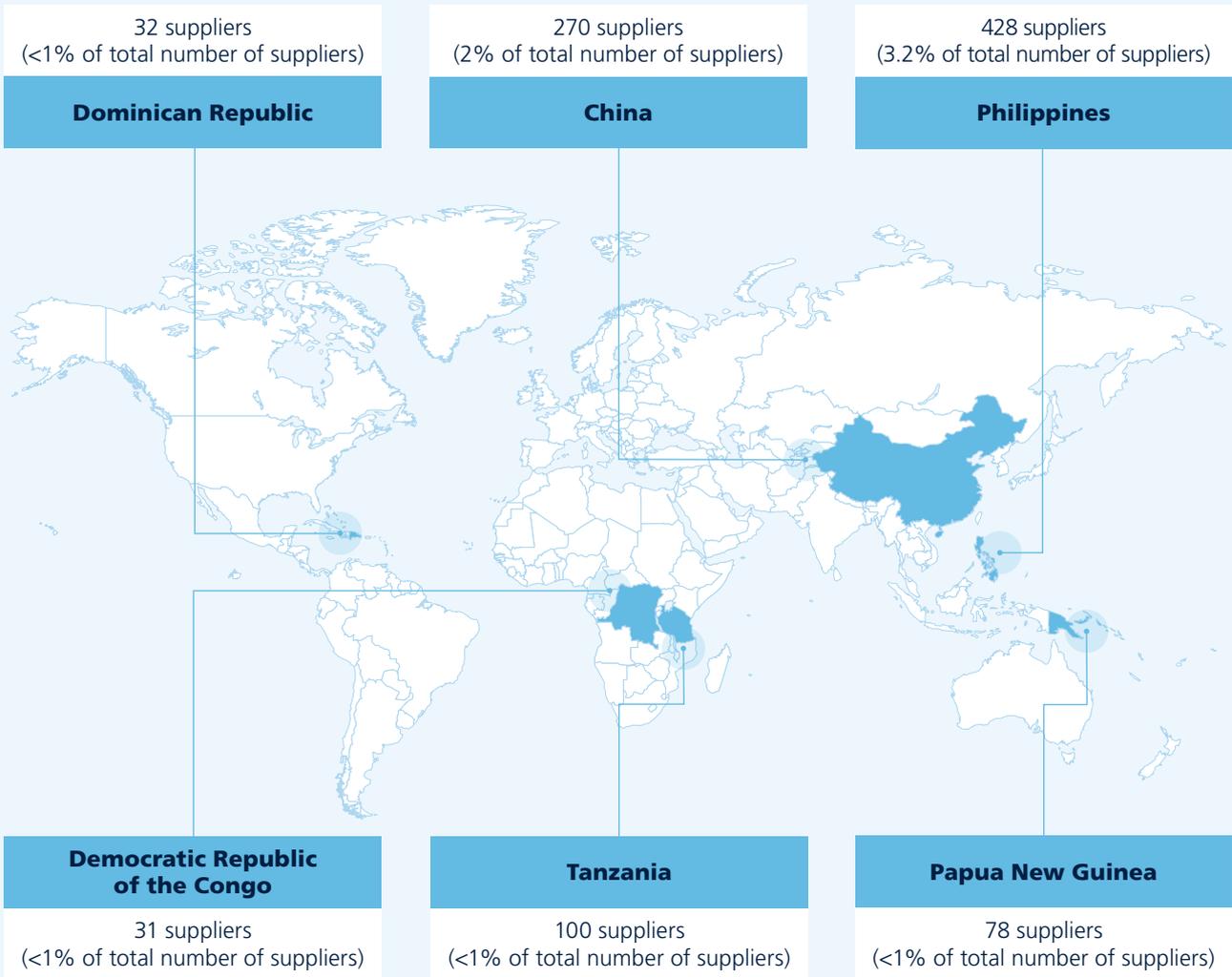


Figure 1

MANAGING RISKS THROUGH DUE DILIGENCE

A number of procedures are in place through our procurement process to manage modern slavery risks in our supply chain.

Supplier selection and onboarding

Our supplier selection process involves qualification procedures to ensure that all potential suppliers meet our safety, sustainability, compliance and performance criteria.

As a condition of doing business with us, suppliers must ensure they:

- comply with all Orica policies and procedures, including Our Code and Human Rights at Work Policy
- meet all country-specific legislative requirements necessary to operate their respective businesses
- meet our strict safety, sustainability and capability requirements.

Contracting and contract management

Our Procurement Group Standard requires that a contract or purchase order must be in place for supply of all goods and services.

Our standard supply agreements contain a 'Forced Labour or Slavery' clause which includes, among others, a requirement for suppliers to:

- investigate their labour practices and ensure there is no forced or slave labour within their operations and the operations of their direct suppliers
- have established policies, processes and systems to provide ongoing assurance that there is no forced or slave labour within their operations and the operations of their direct suppliers.



REPORTING, INVESTIGATION AND REMEDIATION

MECHANISMS FOR REPORTING POTENTIAL ISSUES

Incidents or concerns involving suspicions or allegations of modern slavery or a failure to uphold human rights, as set out in Our Code, can be reported by all stakeholders to an independent, confidential speak-up service. Reports can be made at any time and in multiple languages using the hotline or the Speak-Up service webpage. Reporters have the option to remain anonymous.

To ensure protection for reporters and create an environment where people feel safe and are encouraged to report breaches of Our Code, or other wrongdoings, we maintain a Whistleblower Policy. This outlines our commitment to ensuring the identity of reporters is handled confidentially and that they do not suffer any detrimental outcomes as a result of making a report. People considering reporting can also discuss confidentiality and legal protections with our Whistleblower Protection Advisor.

Individuals within Orica who are authorised to accept a report can do so in any form and discuss the reporter's concerns with them.

Everyone is encouraged to speak up and report behaviours or actions that don't reflect Our Code. We are committed to ensuring everyone can raise concerns freely, without fear of reprisal or intimidation, and that any concerns are dealt with fairly, thoroughly, confidentially and in a timely manner.

INVESTIGATING POTENTIAL ISSUES AND REMEDIATION

All reports are taken seriously and are acted upon in accordance with the principles and processes outlined in our Code of Business Conduct Reporting and Investigations procedure. When a concern or incident is reported, either through our Speak-Up service or directly, it is assessed and investigated to determine if there has been wrongdoing, a breach of Our Code or illegal activity. Depending on the nature of the report, it may be investigated by an external provider or by an authorised person within Orica.

In all instances, we endeavour to identify and comply with applicable laws. The following principles are also embedded in our investigation response:

- investigations are thorough and completed in a timely manner
- we act impartially and with objectivity
- we respect confidentiality and privacy
- people reporting concerns are protected from reprisal.

Where we identify a potential situation of modern slavery, we are committed to acting in the best interest of the impacted individuals and providing remedy where appropriate.

TRAINING

All employees and contractors who are subject to the requirements of Our Code complete mandatory training on joining Orica and refresh training on the Code every two years. The content of the training varies with each refresh ensuring people receive training in all aspects of Our Code in due course. However, content about our reporting mechanisms and protection for reporters remains constant in our training modules.

Our Code includes expectations around our value of Respect. This includes detailed requirements for complying with our human rights policies, including commitments to not use or support the use of any form of slavery.

Training is available online and face-to-face depending on the degree to which individuals have access to our network systems. For those without access (including some contractors) and plant workers in remote locations, training is provided face-to-face by management with the support of regional training leads. Records for employee and contractor completions are retained in their learning profiles.

ASSESSING EFFECTIVENESS

As we evolve our approach over the coming year, we are committed to reviewing the effectiveness of our Modern Slavery Risk Management program by:

- assessing our governance approach, policies and procedures to ensure we effectively address risk of modern slavery within our operations and supply chain
- reviewing our risk assessment approach and associated controls within our operations and supply chain in line with global best practice
- responding promptly to investigate complaints and grievances raised through Orica’s mechanisms for reporting potential issues
- reporting regularly to the BARC on sustainability and human rights.



LOOKING AHEAD: OUR FOCUS FOR FY2021

We are committed to improving the way we address modern slavery risks and incidences within our supply chain and operations.

MODERN SLAVERY AND HUMAN RIGHTS APPROACH

We will continue to enhance our overall approach by identifying the necessary components for a practical and effective modern slavery and human rights framework, covering our key risks, opportunities, governance and processes in relation to our performance.

POLICIES

We will review our existing human rights-related policies against best practice to ensure ongoing effectiveness.

GOVERNANCE, RISK ASSESSMENT AND DUE DILIGENCE

We will mature our governance, risk assessment and due diligence approach within our operations and supply chain by continuing to:

- review the adequacy of (and updating where required) controls to address operational risks in each of the identified risk categories, focusing on risk categories where we may directly cause or contribute to instances of modern slavery
- expand and refine our current risk assessment approach for supply chain
- review and update controls where required through the procurement process.

TRAINING

We plan to undertake a training needs analysis and develop a training approach.

COLLABORATION

We will continue to identify opportunities to work collaboratively with our peers and business partners, through formal voluntary initiatives and informal mechanisms, to ensure we learn from best and current practice.

UNDERSTANDING COVID-19 IMPACTS

COVID-19 has had a significant impact on businesses and workers, particularly vulnerable workers, globally.

From the outset of the pandemic, we have been focused on monitoring disruption risks to our supply chain and ensuring safe and secure supply throughout the crisis without placing undue pressure on our existing suppliers. This included:

- undertaking a detailed analysis on each commodity group to identify critical commodities. Where commodities have been identified as critical, we engaged with our suppliers early to understand the potential impact to supply. Our supply chain strategy has already largely eliminated single source supply in favour of multiple sources of supply for critical components, allowing us to ensure security of supply without adversely impacting suppliers
- relying largely on existing suppliers to limit the introduction of additional modern slavery risks through new suppliers. Any new suppliers are screened for risk through our standard compliance screening process however no suppliers were 'fast-tracked' through this process as a result of COVID-19
- ensuring adequate inventory levels at site to make safety stock is available in the event of a disruption and minimise pressure on our suppliers.

We also recognised that some of our suppliers may face commercial uncertainties due to the pandemic. Where we were made aware of business challenges, we worked to support our suppliers through a variety of mechanisms, including releasing payment early and reducing payment terms.

As part of our ongoing due diligence, we will continue to review the impacts of COVID-19 on our supply chain and work to identify and mitigate increased modern slavery risks, if they arise.

For more information on our response to COVID-19, please refer to our FY2020 Annual and Sustainability Reports.

CONSULTATION AND APPROVAL PROCESS

Orica operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be consistently applied to our controlled entities. In accordance with this operating model, our consultation process included engagement with:

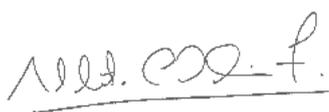
- our Modern Slavery Working Group which developed Orica's response to modern slavery. Our Working Group includes representatives from Ethics and Compliance, Global Supply Chain, Legal, Risk and Assurance, Finance, Human Resources, and Sustainability
- each of the Reporting Entities covered by this statement to confirm 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 Global Supply Chain)
- regional teams, including regional supply chain teams.

Prior to being put to the Board for review and approval, the Statement was reviewed by each member of the Modern Slavery Working Group, Chief Compliance Officer and Group General Counsel, General Counsel EMEA, Company Secretary, Vice President – Supply Chain and Vice President – Risk & Assurance.

This Statement has been endorsed by Orica's Executive Leadership team, and approved by the following Boards:

- Orica Limited on behalf of the Reporting Entities other than Orica Mining Services Pilbara Pty Ltd on 5 November 2020; and
- Orica Mining Services Pilbara Pty Ltd on 2 December 2020.

Signed



Alberto Calderon
Managing Director, Orica Limited



Darryl Cuzzubbo
Chairman of the Board, Orica Mining Services Pilbara Pty Ltd