



**IMDEX™**

**Modern Slavery  
Statement**

**2025**



[imdex.com](https://www.imdex.com)



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**Our purpose as a leading global mining-tech company is to efficiently and sustainably unlock the earth's value.**

**We are uniquely positioned to enable customers to find, define and mine orebodies with precision, confidence and at speed.**

# About This Report

This Modern Slavery Statement (Statement) has been prepared to meet the requirements of the legislation outlined below.

Jurisdiction	Legislation
Australia	Modern Slavery Act 2018 (No 153 of 2018)
Canada	Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)
Norway	Åpenhetsloven (The Transparency Act)

The reporting entities covered by this Statement are shown below. This Statement addresses the requirements for each jurisdiction in a consolidated manner except where information is identified as specific to particular entities.

Jurisdiction	Reporting entity	Registration	Reporting year
Australia	<b>Imdex Limited</b> Included: > 40 entities worldwide.	78 008 947 813	30 June 2025
Canada	<b>Imdex Canada Limited</b>	OCN 1000749968	30 June 2025
Norway	<b>Devico AS</b> Included: > 10 entities worldwide.	947 402 633	30 June 2025

Consistent with our commitment to responsible business practices, this Statement is also aligned to the requirements of the United Kingdom Modern Slavery Act and the California Transparency in Supply Chains Act. IMDEX has business activities in these jurisdictions but does not currently meet the relevant thresholds for mandatory reporting.

Modern slavery is a complex issue that involves a range of serious exploitive practices including slavery, forced labour, human trafficking and child labour. In this Statement, the terms 'modern slavery and child labour' are used to refer to this range of exploitive practices that fall within the scope of the Australian and Canadian laws noted above. Modern slavery and child labour also violate fundamental human rights and decent working conditions within the meanings given to those terms in the Norwegian law outlined above.

This Statement is part of our annual reporting suite. This Statement is supplemented by information on our website at [www.imdex.com](http://www.imdex.com), our 2025 Annual Report available at [www.imdex.com/investor/presentations-reports](http://www.imdex.com/investor/presentations-reports) and our 2025 Sustainability Report available at [www.imdex.com/investor/sustainability](http://www.imdex.com/investor/sustainability).

This Statement may include forward-looking statements. Further information can be found in the Forward-Looking Statements section of this document.

Unless stated otherwise: 'IMDEX', the 'Group', the 'Company', 'we', 'us' and 'our' refer to IMDEX Limited and its relevant controlled entities. References to a year denote the financial year ending 30 June (unless stated otherwise) and references to dollar figures are in AUD currency.

We welcome any questions or feedback about this Statement. Please contact us at [compliance@imdexlimited.com](mailto:compliance@imdexlimited.com).

## Consultation & Methodology

This Statement has been prepared by IMDEX in consultation with all owned and controlled entities. This included a process of data collection and analysis, policy review, and risk assessment. The following methods of consultation were used:

- Our Legal, Risk & Compliance Team gathered inputs from all relevant business units to prepare this Statement. This included specialists from each area such as Human Resources Business Partners, Supply Chain Teams, Support Teams, and our regional business units. These stakeholders have operational responsibilities across owned and controlled entities.
- Our executives and senior management, who have management responsibilities for owned and controlled entities, reviewed and contributed to this Statement.
- Our Directors for each reporting entity reviewed and gave endorsement for this Statement.

## Approval

### Australia

I attest that this statement was approved on 19 December 2025 by the Board of Directors of Imdex Limited, which is the principal governing body for the reporting entities.

### Canada

I attest that this statement was approved on 19 December 2025 by the Board of Directors of Imdex Canada Limited. In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I 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.

I have the authority to bind Imdex Canada Limited.

### Norway

I attest that this report was approved on 19 December 2025 by the Board of Directors of Devico AS.



## Paul House

Managing Director & Chief Executive Officer,  
Imdex Limited  
Director, Imdex Canada Limited  
Director, Devico AS

19 December 2025

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Business Overview

# About IMDEX

IMDEX is a leading global mining-tech company that enables drilling contractors and resource companies to find, mine and define orebodies with precision, confidence and at speed. Our integrated solutions include a broad range of drilling optimisation products, rock knowledge sensors and real-time data and analytics. This offering is commodity agnostic and can be applied across the mining value chain.

# Our Products and Solutions

Our technologies and products allow smarter and safer decisions for people, assets and the earth. We focus on delivering comprehensive solutions that combine products and services from across our range, maximising productivity and value for our customers.

Our four corporate values underpin our actions and help guide our decision making.



### Global Game Changers

Our global experience and diverse thinking drive innovative solutions that reduce environmental and social impacts for our global customers. We empower our people and customers through inclusive decision-making, flexible thinking, and by connecting expertise to create lasting value worldwide.



### Forever Curious

We shape the future of mining by challenging the status quo and creating innovative technologies driven by our talented people, customer needs, and evolving industry trends. Through curiosity, creativity, and collaboration, we set new benchmarks and push the boundaries of the industry.



### Go Beyond

We create exceptional customer experiences by putting their needs at the centre of what we do. Through active listening, collaboration, and innovation, we deliver efficient solutions and lasting value. Strong partnerships and customer involvement drive long-term success and help us deliver on our promises.



### Together We Thrive

We are a diverse, global team that empowers each other to be our best. By sharing knowledge across departments and borders, we create a positive, accountable workplace where safety and well-being come first. We take ownership, celebrate success, and work as one united team.

## Minerals Exploration & Resource Definition

## Mining Production & Non-Mining Activities



### Physical Product

- Drilling fluids
- Solids removal units



### Integrated Field Solutions

- IMDEX Managed Solutions
- Directional Drilling



### Integrated Field Solutions

- Sensors
- Fluids
- IMDEX Mining Technologies



### Data Origination - Digital

- HUB-IQ™
- Krux



### Data Enrichment

- EarthNET Platform
- ioGas™
- aiSIRIS™
- Datarock
- MINEPORTAL™

# Our Workforce and Operations

**Our global presence is unrivalled. This presence provides a compelling opportunity to embed real value for customers and maximise revenue and earnings for IMDEX.**

We support customers in more than **100 countries** and have more than **40 IMDEX facilities across the globe**, including offices, warehouses and calibration centres. Our Head Office is located in Balcatta, Western Australia.

With Devico™ and its facilities now fully integrated into the IMDEX business, we are progressing with the strategic acquisition of Datarock™ and Krux™ with completion expected in FY26. The acquisition of Datarock and Krux complements our market leadership technologies and positions us to provide a full suite of integrated ore body knowledge solutions to our customers.

**IMDEX operates a global business model serving customers through our own regional business operations and a supporting network of Third Party Representatives.**



## Our Third Party Representatives

IMDEX partners with Third Party Representatives to extend our market reach and deepen our support for customers in our core markets. They support us with lead generation, sales, logistics and customer on-site support.

Our network of Third Party Representatives extends to over 40 countries. We screen our partners carefully and set ongoing compliance standards to ensure that they meet our expectations for ethics and customer service. Our regional businesses work closely with Third Party Representatives to ensure that we remain aligned on strategy and quality.

Our Third Party Representatives also develop sales opportunities and supply products, software and services to customers in their assigned sales territories. Some Third Party Representatives also provide business support services to IMDEX operations.

## Our Supply Chain

**IMDEX has a complex and extensive global supply chain that supports our diverse product range. Our supply chain spans multiple regions, including Asia-Pacific, North America, South America, Europe, and Africa, and encompasses the procurement of raw materials and components, manufacturing, and delivery of finished products, as well as business support services.**

Our supply chain focuses on several critical areas, including:

- Sourcing high-quality raw materials and technical components for our drilling optimisation products and rock knowledge sensors
- Manufacturing and production of our drilling optimisation products and rock knowledge sensors
- Rapid prototyping and engineering services to support our research and development initiatives
- Efficient distribution and logistics systems to respond quickly to changing customer needs
- Global service centres that provide dedicated support to our customers.

As part of our commitment to responsible and sustainable business practices, we prioritise local procurement wherever technically and commercially viable, sourcing from suppliers that operate within the same country where we manufacture and operate.

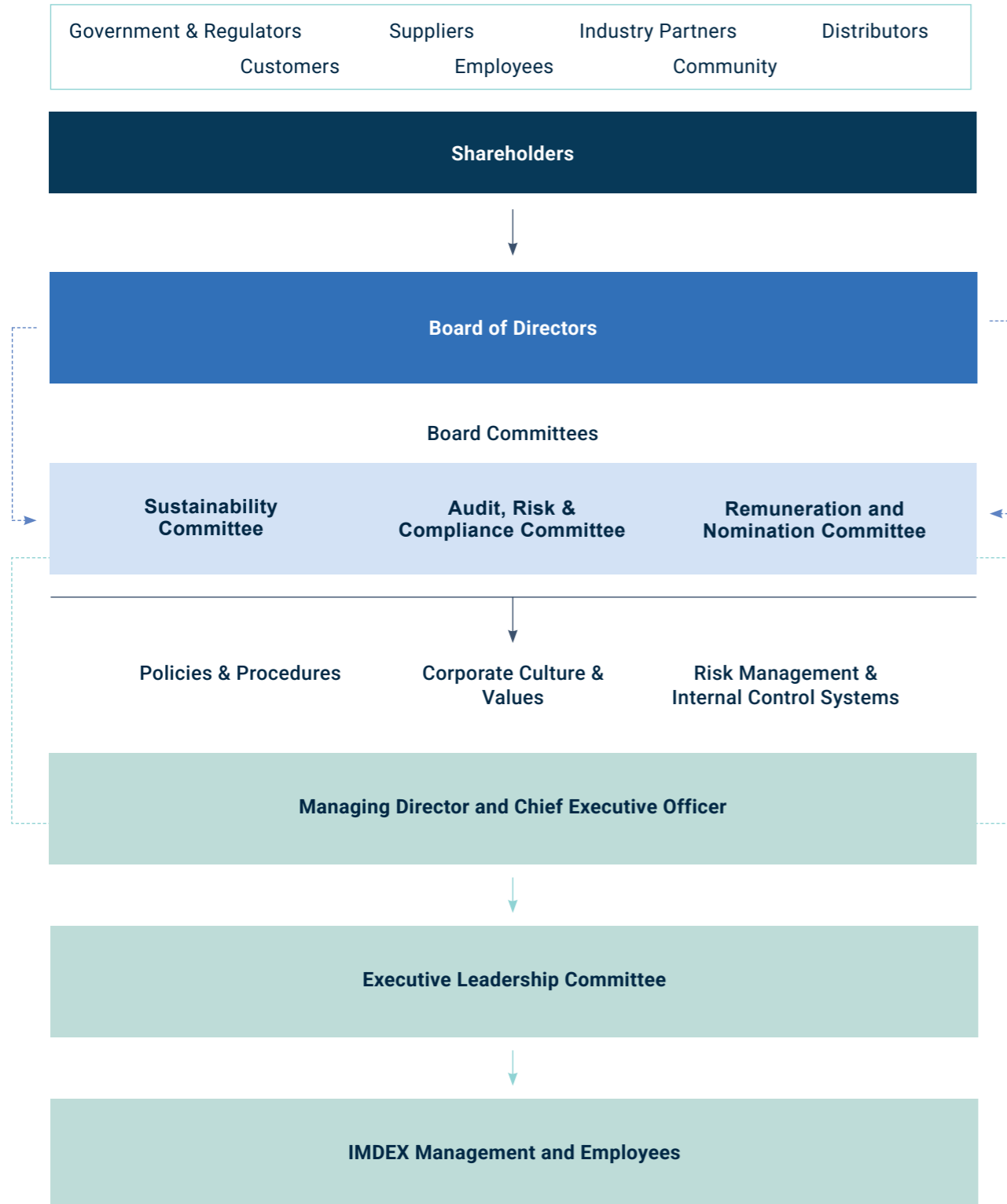
In FY25, we improved our local procurement efforts, with 76% of our global procurement budget allocated to local suppliers – an increase from 70% in FY24.

## Our Customers and Industry Partners

**Our long-standing customer base includes large drilling contractors and resource companies within the global minerals industry.**

We are creating a collaborative ecosystem, where we partner with all customers to optimise orebodies and support resource stewardship.

## Our Stakeholders and Governance



# Managing Our Risk Exposure

## Management Approach

IMDEX applies a robust approach to managing potential risks of modern slavery, child labour, and human rights concerns. This includes policies and risk management practices which govern how we operate our business within the risk tolerances set by the Imdex Limited Board of Directors.

## Policy Framework

Our policy framework includes the key documents shown below. These apply to all IMDEX businesses.

Policy	Function	Implementation
Global Code of Conduct	Establishes our expectations for awareness and commitment to ethics, human rights, diversity and inclusion, and zero tolerance for slavery within our operations.	Employees complete annual online training through Imdex Academy. Third Party Representatives confirm their commitment during onboarding.
Supplier Code of Conduct	Establishes our expectations for awareness and commitment to the same code of conduct as described above for our suppliers.	Supplier onboarding and communications.
Sustainability Policy	Establishes our commitment to supporting sustainable development, including upholding ethical business practices.	Business procedures and annual Sustainability Report.
Risk Management Policy	Establishes the risk management framework for risks including modern slavery, child labour and human rights.	Regular training, support, and compliance monitoring by our Legal, Risk & Compliance Team.
Compliance Policy	Establishes the framework for regulatory compliance including modern slavery, child labour and human rights laws.	Regular training, support, and compliance monitoring by our Legal, Risk & Compliance Team.
Health, Safety & Environment Policy	Establishes our commitment to providing safe workplaces, including promoting worker engagement in health and safety initiatives.	Business procedures and engagement activities as part of our health and safety management system.
Diversity, Equity & Inclusion Policy	Establishes our expectations for respect, dignity, and inclusiveness for all workers. Supported by our Discrimination, Harassment & Bullying Policy.	Business procedures and People and Culture initiatives.
Speak Up Policy	Establishes confidential and anonymous reporting processes for misconduct, harassment, bullying, modern slavery risk exposure and other human rights concerns.	Regular awareness campaigns and prominent displays of the reporting portal details.

These policies are available at [www.imdex.com/about/corporate-governance](http://www.imdex.com/about/corporate-governance).

## Risk Management Framework

Our risk management framework formalises our expectations for identifying, assessing, controlling and managing risks. This includes risks relating to modern slavery, child labour, forced labour, human trafficking, human rights and decent working conditions.

The IMDEX Due Diligence Procedure sets out how we specifically manage risks associated with external suppliers, Third Party Representatives and other industry partners.

The diagram below depicts the alignment of our risk management framework and due diligence processes to the OECD Due Diligence Guidance for Responsible Business Conduct 2023 and the Norwegian Åpenhetsloven (The Transparency Act).

Due Diligence Guidance Element	Risk Segment		
	Operations (Workforce)	Operations (Third Party Representatives)	Supply Chain
1. Embedding responsible business conduct	<ul style="list-style-type: none"> <li>Global Code of Conduct</li> <li>Code of Conduct training</li> <li>Ethics Declarations</li> </ul>	<ul style="list-style-type: none"> <li>Global Code of Conduct</li> <li>Code of Conduct commitment</li> <li>ABAC training</li> </ul>	<ul style="list-style-type: none"> <li>Supplier Code of Conduct</li> <li>Code of Conduct commitment</li> </ul>
2. Identifying & assessing impacts	<ul style="list-style-type: none"> <li>People &amp; Culture policies</li> <li>Screening &amp; due diligence checks</li> <li>Ethics declarations</li> <li>Performance &amp; development programs</li> <li>High risk list</li> <li>Speak Up reporting</li> </ul>	<ul style="list-style-type: none"> <li>Risk &amp; Governance policies</li> <li>Screening &amp; due diligence checks</li> <li>Questionnaires</li> <li>External due diligence</li> <li>High risk list</li> <li>Speak Up reporting</li> </ul>	<ul style="list-style-type: none"> <li>Supply Chain policies</li> <li>Screening &amp; due diligence checks</li> <li>Questionnaires</li> <li>Audit program</li> <li>High risk list</li> <li>Speak Up reporting</li> </ul>
3. Preventing & mitigating impacts	Risk management		
4. Tracking implementation	Risk monitoring		
5. Communicating how impacts are addressed	Public modern slavery and transparency reporting Sustainability Report (GRI/SASB)		
6. Providing for remediation	Remediation		

For more on our risk and governance processes, and how we engage with internal and external stakeholders, refer to our 2025 Annual Report available at [www.imdex.com/investor/presentations-reports](http://www.imdex.com/investor/presentations-reports) and our 2025 Sustainability Report available at [www.imdex.com/investor/sustainability](http://www.imdex.com/investor/sustainability).

## Operations

### Risk Exposure & Potential Adverse Impacts

#### Our Workforce & Operations

Our workforce is diverse, inclusive, and aligned to our technical leadership position in the market.

Our workforce composition is accordingly lower risk for modern slavery, child labour and human rights concerns:

- Many positions are skilled professional or management roles (~67% of our workforce). This includes roles such as engineers, technical sales, software developers and professional support services.
- Most positions are based in comparatively lower risk jurisdictions (~80% of our workforce): including countries such as Australia, Norway, the United States, Chile and South Africa.
- Most positions are appointed on permanent employment arrangements (~97% of our workforce).

IMDEX makes limited use of external contractors and labour hire arrangements to supplement our regular workforce. These are treated as suppliers for the purposes of this Statement.

We do not operate in comprehensively sanctioned countries which often also have high human rights risk and poor transparency. This includes countries such as Iran, North Korea and Myanmar, amongst others.

**We have not identified any significant risks of modern slavery, child labour or human rights concerns in our operations.** We have considered potential areas of risk exposure as shown in the table below which are subject to ongoing monitoring.

#### Limited workforce in countries with higher prevalence of modern slavery

We employ personnel in higher risk countries such as Colombia, Hong Kong, India and Indonesia. We employ fewer than 40 workers in these countries (less than 5% of our global workforce).

Our workers in these countries are in skilled roles such as field technicians, software development and management. They are not engaged in higher risk sectors such as agriculture, textiles or electronics. As such we do not consider this to be a significant risk exposure for IMDEX.

#### On-site operations in countries with higher prevalence of modern slavery

Our field personnel travel to support customers in higher risk countries such as Democratic Republic of Congo, Saudi Arabia, Kazakhstan and Papua New Guinea.

Our field personnel are skilled technical specialists that are usually based in lower risk countries. They travel to support our customers when required. Our field personnel do not support locally higher risk sectors such as agriculture or unskilled labour. As such we do not consider this to be a significant risk exposure for IMDEX.

**Third Party Representatives in countries with higher prevalence of modern slavery**

We have Third Party Representatives in higher risk countries such as Democratic Republic of Congo, Saudi Arabia, Côte d'Ivoire and Indonesia. These constitute less than 5% of our global revenue.

Our Third Party Representatives generally employ skilled technical specialists and are not representing us in locally higher risk sectors such as agriculture, unskilled labour, textiles or electronics. As such we do not consider this to be a significant risk exposure for IMDEX.

**Products and services supplied to countries with higher prevalence of modern slavery**

We supply products and services for use in mining and exploration. Some of our customers are in higher risk countries for exploitative mining such as Democratic Republic of Congo, Ghana, Tanzania and Peru.

Our products are designed for use in modern, mechanised mining methods which are not typically found in the type of artisanal and small-scale mining operations most often reported for modern slavery. We have not identified any exposure in our operations to these kinds of mines, and as such we do not consider this to be a significant risk exposure for IMDEX.

**The following controls are used to mitigate modern slavery, child labour and broader human rights risks in our workforce:**

Recruitment follows documented procedures which ensure compliance with local laws. Support and oversight are provided by our Human Resources Business Partners.

Underage candidates (per local laws and child labour conventions) are not considered for employment, traineeships or internships.

Written contracts are provided for workers in a language they understand describing their wages, hours of work, and conditions of employment.

We do not retain worker identity documents, hold security deposits, or impose penalties which could prevent workers from leaving their employment.

We do not withhold wages other than in compliance with local taxes, worker entitlements legislation or court-ordered garnishments. Workers are provided with written payslips providing details of their remuneration.

Wages are set according to industry benchmarks and regularly reviewed. Relevant local legislative minimum wages are met or exceeded where appropriate.

Our workers are free to associate, organise, and participate in trade unions in accordance with local laws.

We have health, safety and environment management systems to ensure that our people are safe at work. We promote worker participation and provide regular training.

We have clear policies prohibiting discrimination, harassment and bullying. Workers are provided with ongoing training to ensure they understand our values and policies.

Our workers and managers complete annual ethics declarations to confirm their ongoing commitment to responsible business conduct and to disclose any ethical concerns.

Grievances and concerns can be raised by workers with their manager, their local Human Resource Business Partners, or anonymously using our Speak-Up platform.

Where conditions do not meet minimum standards, appropriate action is taken, including remediation for those affected (see more in Remediation below).

For more on our People and Culture initiatives, please refer to our 2025 Sustainability Report available at [www.imdex.com/investor/sustainability](http://www.imdex.com/investor/sustainability).

**Our Third Party Representatives**

Our Third Party Representatives develop sales opportunities and supply products, software and services to customers in their assigned sales territories. Some Third Party Representatives also provide business support services to IMDEX operations.

The workforces of our Third Party Representatives are similar to our own: being generally comprised of skilled roles such as drilling specialists, technical sales and professional services which are comparatively lower risk for modern slavery, child labour and human rights risks.

**We have not identified any significant risks of modern slavery, child labour or human rights concerns in our Third Party Representatives.** We have considered potential areas of risk exposure as shown in the table above which are subject to ongoing monitoring.

**Due Diligence & Risk Management**

**Our Workforce & Operations**

**IMDEX operates robust People & Culture processes which are implemented and monitored by professional Human Resource Business Partners in all regions.**

We prioritise a safe work environment and the welfare of our people. This also means ensuring that our people feel valued, are compensated with a living wage, and have full access to their legal entitlements.

Our Global Code of Conduct is the underpinning standard for responsible business conduct in our workforce and is binding on all directors, officers, managers, employees, and contractors.

Our Global Code of Conduct and policies are available at [www.imdex.com/about/corporate-governance](http://www.imdex.com/about/corporate-governance).

### Our Third Party Representatives

**IMDEX operates robust third party governance processes to evaluate, monitor and manage potential risks associated with our Third Party Representatives.**

Our Third Party Representatives are required to abide by the same Code of Conduct as our employees. This includes completion of our anti-bribery and anti-corruption training which feeds into our expectations for responsible business conduct and human rights.

Our Global Code of Conduct and policies are available at [www.imdex.com/about/corporate-governance](http://www.imdex.com/about/corporate-governance).

**The following controls are used to safeguard responsible business conduct by our Third Party Representatives:**

Third party screening and due diligence processes are used to screen and monitor Third Party Representatives, their ultimate beneficial owners and directors.

Our contracts with Third Party Representatives contain provisions which require that IMDEX policy standards are met: including our Code of Conduct which addresses human rights, diversity and inclusion, anti-discrimination, privacy, and zero tolerance for modern slavery.

Third Party Representatives are required to participate in anti-bribery and anti-corruption training and self-assessment questionnaires covering business conduct topics.

Third Party Representative performance and behaviours are monitored and managed by IMDEX account managers.

Concerns or potential modern slavery or human rights risks can be reported by IMDEX employees and Third Party Representatives to their IMDEX manager, to the Legal, Risk & Compliance Team, or confidentially using the IMDEX Speak-Up platform.

Where performance does not meet minimum standards, appropriate action is taken, including remediation for those affected (see more in Remediation below).

## Supply Chain

### Risk Exposure & Potential Adverse Impacts

**IMDEX leverages a global supply chain to source components, materials and services to deliver our products to the market.**

We consider modern slavery, child labour and human rights risks across our supply chains for both manufacturing and non-manufacturing businesses.

**Our non-manufacturing supply chain** includes professional services, logistics, travel, software, insurances and other supply segments which support our operations.

**Our manufacturing supply chain includes:**

- **Rock knowledge sensors and other instrumentation products** manufactured by IMDEX in Australia, the United States and Norway using components procured from external suppliers. Peripheral devices and some finished sensors are procured from external suppliers in Europe and the United States.
- **Drilling optimisation and directional drilling equipment** manufactured by IMDEX in Australia, Norway and Germany using raw materials procured from external suppliers. Some finished machinery is procured from external suppliers in Europe and Australia.
- **Drilling optimisation fluids and chemical products** manufactured, blended or packaged by IMDEX in Australia, the Americas and South Africa using raw materials procured from external suppliers. Some finished products are procured from external suppliers in Asia, Europe, Africa and the Americas.

There is risk potential through suppliers which could be affected by slavery in the production or delivery of raw materials.

**We have not identified any specific significant risks of modern slavery, child labour or human rights concerns but we continue to monitor** risk potential through suppliers which could be affected by slavery in the production or delivery of products as shown in the table below.

#### Agriculture derivatives

*Some of our drilling fluid products are made using raw materials indirectly originating from agriculture: such as vegetable oils, xanthan gum and sodium lauryl ether sulfate (SLES). These contribute to product functionality and biodegradability.*

The agricultural sector is reported as having a higher prevalence of modern slavery and child labour in parts of Asia, Africa and South America.

We source most of our agricultural raw materials from suppliers in Australia, the Americas and East Asia. Our supply chain includes some suppliers in South Asia.

We did not identify any particular risk of modern slavery and child labour among our Tier 1 suppliers in FY25.

### Cotton and textiles

Some of our drilling fluid products are made using raw materials indirectly originating from cotton: such as polyanionic cellulose. These contribute to product functionality such as fluid loss and filtration control.

We also procure company uniforms, workwear and PPE which are made from cotton and other textiles.

The cotton and textiles sectors are reported as having a higher prevalence of modern slavery and child labour in parts of Asia, South America, Africa and the Middle East.

We source most of our cotton-based cellulose raw materials through suppliers Europe, and our supply chain includes suppliers in East Asia.

We source most of our uniforms from local suppliers in Australia, the Americas and Europe.

We did not identify any particular risk of modern slavery and child labour among our Tier 1 suppliers in FY25.

### Extractive industry

Some of our drilling fluid products are made from raw materials from extractive industries: such as bentonite, barite and minerals. These contribute to product functionality such as improving viscosity and weighting.

We also use metal components in product housings, fittings, electronics and other ancillary purposes.

Lithium-ion batteries (containing cobalt and copper) are present in a few of our sensor products, but more commonly in the tablet computers used to operate our sensor products and in computers used for internal business functions.

Extractive industry is reported having a higher prevalence of modern slavery and child labour in parts of Africa, South America and Asia. Lithium-ion batteries are often noted as a source of particular risk for child labour in Africa.

We source most of our mineral-based raw materials from suppliers in Australia, the United States and Europe. Our supply chain includes some suppliers in South Asia.

We source most of our lithium-ion batteries from suppliers in the United States, Europe and Australia. Our supply chain includes one supplier in East Asia.

We did not identify any particular risk of modern slavery and child labour among our Tier 1 suppliers in FY25.

### Electronics

Our sensor and equipment products contain electronic components: such as circuit boards, cables, gyroscopes, and processors. These enable functions such recording geophysical measurements and transmitting data. Our sensor products are also often supplied with tablet computers and cables to operate the product.

We also use computers and IT equipment for our business systems, cyber security, and software development functions.

The electronics sector is reported as having a higher prevalence of modern slavery and child labour in parts of Asia.

We source most of our electronic components, computers and IT equipment from suppliers in Australia, the United States and Europe. Our supply chain includes some suppliers in East Asia.

We did not identify any particular risk of modern slavery and child labour among our Tier 1 suppliers in FY25.

## Due Diligence & Risk Management

**IMDEX operates a supply chain management system which applies rigorous due diligence and risk-based decision-making to mitigate modern slavery, child labour and human rights risk.**

Our Supplier Code of Conduct sets out our expectations from suppliers. This includes a strict zero-tolerance position towards modern slavery.

Our Supplier Code of Conduct is available at [www.imdex.com/about/corporate-governance](http://www.imdex.com/about/corporate-governance).

We use third party screening and monitoring software to flag potential supplier risk exposure across modern slavery, child labour and human rights. This is supplemented by insights from the teams that work with our suppliers. Any identified risks are then mitigated and managed in accordance with our risk standards and IMDEX values.

IMDEX does not appoint suppliers linked to comprehensively sanctioned countries which often also have high human rights risk and poor transparency. This includes countries such as Iran, North Korea and Myanmar, amongst others.

**The following controls are used to mitigate modern slavery risks in our supply chain:**

Procurement follows documented procedures and is carried out in accordance with our Supplier Code of Conduct. Support and oversight are provided by our Supply Chain Teams.

We provide training for key supply chain team members on recognising and reporting modern slavery, child labour and broader human rights concerns. See the Training and Accountability section of this Statement for more.

Supplier prequalification and onboarding processes are used to evaluate suppliers against a range of risk criteria: including modern slavery, child labour and human rights risk profiles of the countries and industries in which suppliers are operating.

All suppliers are subject to due diligence in accordance with our procedures. This includes automated screening which is then reviewed internally. Any red flags are assessed and mitigated in accordance with our procedures.

We also operate an annual audit program which carries out at least one audit per year on a supplier identified as being potentially higher risk. These audits are conducted by an independent auditor and focus on slavery risk indicators, human rights, workplace conditions and living wage. Audits are generally planned and communicated in advance (i.e. our audits are not unannounced).

We periodically carry out self-assessment questionnaire campaigns which require our high-spend and/or higher risk suppliers to provide specific information about their operations, practices and policy frameworks.

Supplier compliance with our standards is monitored and managed by members of our Supply Chain Teams.

Any employee can report suspected modern slavery, child labour or human rights concerns to their manager, to the Legal, Risk & Compliance Team, or confidentially using our Speak-Up platform.

Where a supplier has elevated modern slavery risk exposure, including potential involvement in slavery-like practices, further action is taken. This includes both risk management strategies and appropriate remediation (see more in Remediation below).

IMDEX does not currently require Tier 1 suppliers to certify that the materials supplied to IMDEX are compliant with relevant laws regarding slavery and human trafficking. Our Supplier Code of Conduct prohibits involvement in slavery.

For more on our supply chain initiatives, please refer to our 2025 Sustainability Report available at [www.imdex.com/investor/sustainability](http://www.imdex.com/investor/sustainability).

## Training and Accountability

**IMDEX provides training for our workforce and Third Party Representatives on responsible business conduct and modern slavery awareness.**

We use our Imdex Academy online training platform to deliver training. We track completion of both initial training and periodic refresher training.

Our **workforce** completes Code of Conduct, Better Together, Privacy Protection and ABAC training.

Our people also complete annual Ethics Declarations in which they confirm their understanding and commitment to these standards of conduct.

Selected workers in procurement and supplier management roles complete our Modern Slavery Awareness training. In FY25-26 this includes an additional training session on audit standards and living wage awareness.

**Our Third Party Representatives** confirm their commitment to our Global Code of Conduct and ABAC standards as part of their onboarding.

Our Third Party Representatives' directors and some customer-facing personnel are also required to complete our ABAC training.

Our Code of Conduct e-learning module covers the human rights, diversity and inclusion, anti-discrimination, privacy, and modern slavery topics described in our Global Code of Conduct. This is supplemented by our Better Together training (diversity, inclusion and anti-discrimination) and additional e-learning courses in Privacy Protection and Anti-Bribery and Anti-Corruption (ABAC). Our e-learning modules are developed and hosted with support from external providers.

Our Modern Slavery Awareness training content is supplied by an external provider and covers modern slavery, forced labour and child labour, and risk in supply chains.

Our workers and Third Party Representatives are held accountable for acting in accordance with the standards outlined above. Any instances of involvement or failure to report suspected instances of modern slavery, child labour and human rights violations are treated with the utmost seriousness. These kinds of breaches of our Code of Conduct may result in disciplinary action up to and including termination.

## Remediation

**IMDEX has grievance reporting and compliance incident investigation processes to ensure we address any potential instances of modern slavery, child labour, or human rights issues.**

Our workers, contractors and business partners can raise grievances at any time through various channels including line management, our Human Resources Business Partners, Supply Chain Teams, and our Legal, Risk & Compliance Team. Such grievances are resolved in accordance our people and culture policies and regulatory compliance procedures.

Confidential and anonymous reporting is also available through our Speak-Up reporting portal. We provide an online reporting portal as an accessible and protected means of making such reports. Submissions are escalated directly to our Legal, Risk & Compliance Team. Reports can also be made directly via email or phone to our Chief Executive Officer or Chairperson of the Audit, Risk & Compliance Committee of the Imdex Limited board.

Reports can also be made directly to IMDEX by victims, their families, or representatives (such as human rights advocacy groups).

Our Speak-Up Policy is available at [www.imdex.com/about/corporate-governance](http://www.imdex.com/about/corporate-governance).

Reports can be made directly to [compliance@imdexlimited.com](mailto:compliance@imdexlimited.com).

Speak-Up reports are treated with the utmost seriousness. Our Speak-Up Policy expressly prohibits reprisals or victimisation and specifies measures to be taken to protect victims.

No potential or actual instances of modern slavery, child labour or similar human rights violations were reported to IMDEX in FY25. As such we have not undertaken any remediation actions to address such instances. Had any such reports been received, these would be handled in accordance with our compliance investigation procedures and Speak-Up Policy (if relevant).

We understand that remediation actions can have unintended adverse impacts for affected individuals, their families and local communities. IMDEX is committed to preventing and remediating any actual instances of modern slavery, child labour and human rights violations while minimising any impacts on victims and the most vulnerable families.

We proactively contribute to the local communities in which we operate through various community engagement and volunteering programs. Our 2025 Sustainability Report contains more details on these programs and is available at [www.imdex.com/investor/sustainability](http://www.imdex.com/investor/sustainability).

## Assessing Effectiveness

**Our risk management policies and procedures guide how we assess the effectiveness of risk controls for modern slavery, child labour and broader human rights.**

IMDEX monitors the effectiveness of risk controls and actions on a group-wide basis. These measures are implemented by our business units under the direction of management. Part of this process involves iterative feedback from management on progress, effectiveness and any challenges.

Further feedback is provided by the specialist teams that provide support and guidance. This includes our Human Resources Business Partners, Supply Chain Teams and Global Operations Support Team.

We also take insights into control effectiveness from the various due diligence processes in our risk management framework. For example, we evaluate the effectiveness of supply chain controls using the data on modern slavery and child labour gained from our due diligence software and supplier self-assessment questionnaires.

While we did not receive any relevant reports through our Speak-Up reporting portal in FY25, such reports would also have provided insights into the effectiveness of our risk controls and actions.

These insights drive our initiatives to improve and strengthen our control effectiveness (shown in the Annual Performance section of this Statement).

Monitoring of effectiveness and selection of continuous improvement initiatives is done by our Legal, Risk & Compliance Team and executives. Top-level oversight and direction are provided by the Audit, Risk & Compliance Committee and Sustainability Committee of the Imdex Limited board.



IMDEX Vehicle On-site

# Annual Performance

## Key Achievements & Focus Areas

In FY25 we continued to improve and strengthen our safeguards for modern slavery, human child labour and human rights.

We completed the following measures which were set as focus areas in our FY24 Modern Slavery Statement:

Consolidation and streamlining of our reporting formats for Australian, Norwegian and Canadian modern slavery and transparency legislation. This was accomplished as part of our FY24 reporting cycle and all versions are available on our website.

Completion of the deployment of our updated due diligence and governance framework for Third Party Representatives. This work has enabled a new FY26 focus area for maintaining conformity among our Channel Partners.

Development and completion of further actions based on the learnings from our FY24 self-assessment questionnaires campaign. This included follow-up enquiries and reviewing audit reports to evaluate the risk profile of some of our suppliers. This led to the development of a new audit standard for living wage which forms part of our FY26 focus areas.

In FY26 we will implement the following measures:

Development and publication of a modern slavery and human rights policy to formalise and clearly communicate our stance on these issues.

Maintenance of high risk supplier and Channel Partner conformity with our training and governance standards at 90% or higher.

Development and delivery of a modern slavery audit and living wage awareness training campaign to 100% of our supply chain teams.

# Annex A / Compliance with relevant legislation

Australia – Modern Slavery Act 2018 (No 153 of 2018)	Section	Relevant Headings	Pages
Identifies the reporting entity	s16(1)a	About this Statement	
Describes the structure, operations and supply chain of the reporting entity	s16(1)b	Business Overview	
Describes the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	s16(1)c	Operations Risk Exposure & Potential Adverse Impacts Supply Chain Risk Exposure & Potential Adverse Impacts	
Describes the actions taken to assess and address modern slavery risks, due diligence processes, and remediation processes for operations and supply chains	s16(1)d	Management Approach Operations Due Diligence & Risk Management Supply Chain Due Diligence & Risk Management Remediation	
Describes how the effectiveness of actions is assessed	s16(1)e	Assessing Effectiveness	
Describes the process of consultation with any entities that the reporting entity owns or controls	s16(1)f	Consultation	
Includes any other information that the reporting entity considers relevant	s16(1)g	Throughout	
Includes the details of approval by the principal governing body of the reporting entity	s16(2)a	Approval	

Canada – Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c. 9)	Section	Relevant Headings	Pages
Identifies the structure, activities and supply chains of the reporting entity	s11(3)(a)	Business Overview	
Describes policies and due diligence processes in relation to forced labour and child labour	s11(3)(b)	Management Approach Operations Due Diligence & Risk Management Supply Chain Due Diligence & Risk Management	
Describes the parts of the business and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk	s11(3)(c)	Operations Risk Exposure & Potential Adverse Impacts Supply Chain Risk Exposure & Potential Adverse Impacts	
Describes any measures taken to remediate any forced labour or child labour	s11(3)(d)	Remediation	
Describes 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	s11(3)(e)	Remediation	
Describes the training provided to employees on forced labour and child labour	s11(3)(f)	Training and Accountability	
Describes how the reporting entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	s11(3)(g)	Assessing Effectiveness	
Approval of the report by the reporting entity's governing body	s11(4)	Approval	

Norway – Åpenhetsloven	Section	Relevant Headings	Pages
A general description of: <ul style="list-style-type: none"> <li>The enterprise's structure and area of operations</li> <li>Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions</li> </ul>	s5(a) s5(a)	Business Overview Management Approach Operations Due Diligence & Risk Management Supply Chain Due Diligence & Risk Management	
Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence	s5(b)	Operations Risk Exposure & Potential Adverse Impacts Supply Chain Risk Exposure & Potential Adverse Impacts Remediation	
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	s5(c)	Management Approach Operations Due Diligence & Risk Management Supply Chain Due Diligence & Risk Management Annual Performance	

This Statement also conforms with the legislation shown below. IMDEX is not currently required to be publish reports in accordance with this legislation.

California Transparency in Supply Chains Act of 2010	Section	Relevant Headings	Pages
Discloses whether the retail seller engages in verification of product supply chains to evaluate and address risks of human trafficking and slavery. The disclosure shall specify if the verification was not conducted by a third party.	§ 1714.43(c)(1)	Supply Chain Due Diligence & Risk Management	
Discloses whether the retail seller conducts audits of suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains. The disclosure shall specify if the verification was not an independent, unannounced audit.	§ 1714.43(c)(2)	Supply Chain Due Diligence & Risk Management	
Discloses whether the retail seller requires direct suppliers to certify that materials incorporated into the product comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business.	§ 1714.43(c)(3)	Supply Chain Due Diligence & Risk Management	
Discloses whether the retail seller maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking.	§ 1714.43(c)(4)	Training and Accountability	
Discloses whether the retail seller provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	§ 1714.43(c)(5)	Training and Accountability	

United Kingdom – Modern Slavery Act 2015	Section	Relevant Headings	Pages
Information about the organisation's structure, business and supply chains.	s54(5)(a)	Business Overview	
Information about the organisation's policies in relation to slavery and human trafficking.	s54(5)(b)	Management Approach	
Information about the organisation's due diligence processes in relation to slavery and human trafficking in business and supply chains.	s54(5)(c)	Operations Due Diligence & Risk Management Supply Chain Due Diligence & Risk Management	
Information about the parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps taken to assess and manage that risk.	s54(5)(d)	Training and Accountability	
Discloses whether the retail seller provides company employees and management, who have direct responsibility for supply chain management, training on human trafficking and slavery, particularly with respect to mitigating risks within the supply chains of products.	§ 1714.43(c)(5)	Operations Risk Exposure & Potential Adverse Impacts Due Diligence & Risk Management Supply Chain Risk Exposure & Potential Adverse Impacts Due Diligence & Risk Management	
Information about the organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as considered appropriate.	s54(5)(e)	Assessing Effectiveness	
Information about the training about slavery and human trafficking available to the organisation's staff.	s54(5)(f)	Training and Accountability	



# Forward Looking Statements

This report may contain certain 'forward-looking statements' and projections provided by or on behalf of Imdex limited (IMDEX). Forward looking statements can generally be identified by the use of forward looking words such as, 'expect', 'anticipate', 'likely', 'intend', 'should', 'could', 'may', 'predict', 'plan', 'propose', 'will', 'believe', 'forecast', 'estimate', 'target', 'outlook', 'guidance' and other similar expressions within the meaning of securities laws of applicable jurisdictions. These forward looking statements reflect various assumptions made by or on behalf of IMDEX. You are cautioned not to place undue reliance on forward looking statements. The statements, opinions and estimates in this report are based on assumptions and contingencies subject to change without notice, as are statements about market and industry trends, projections, guidance, and estimates. The forward looking statements contained in this report are not guarantees or predictions of future performance and involve known and unknown risks and uncertainties and other factors, many of which are beyond the control of IMDEX, and may involve significant elements of subjective judgement and assumptions as to future events which may or may not be correct. The forward looking statements are subject to significant business, economic and competitive uncertainties and contingencies associated with the Mining-Tech industry which may be beyond the control IMDEX, which could cause actual results or trends to differ materially, including but not limited to retention of key business relationships, environmental impacts and claims, operational and executional risks, research and development and intellectual property risks, an inability to meet customer demand, price and currency fluctuations, operating results, legislative, fiscal and regulatory developments, economic and financial market conditions in various countries, approvals and cost estimates, environmental risks, ability to meet funding requirements and share price volatility. Accordingly, there can be no assurance that such statements and projections will be realised. IMDEX makes no representations as to the accuracy or completeness of any such statement of projections or that any forecasts will be achieved. A number of important factors could cause actual results, achievements or performance to differ materially from the forward looking statements, including the risks and uncertainties set out above. Investors should consider the forward looking statements contained in this report in light of those matters. the forward looking statements are based on information available to IMDEX as at the date of this report. Except as required by law or regulation (including the ASX listing rules), IMDEX undertakes no obligation to provide any additional or updated information whether as a result of new information, future events, or results or otherwise. indications of, and guidance or outlook on, future earnings or financial position or performance are also forward looking statements.

Ezy Gyro Operators

