

**IMDEX**<sup>TM</sup>

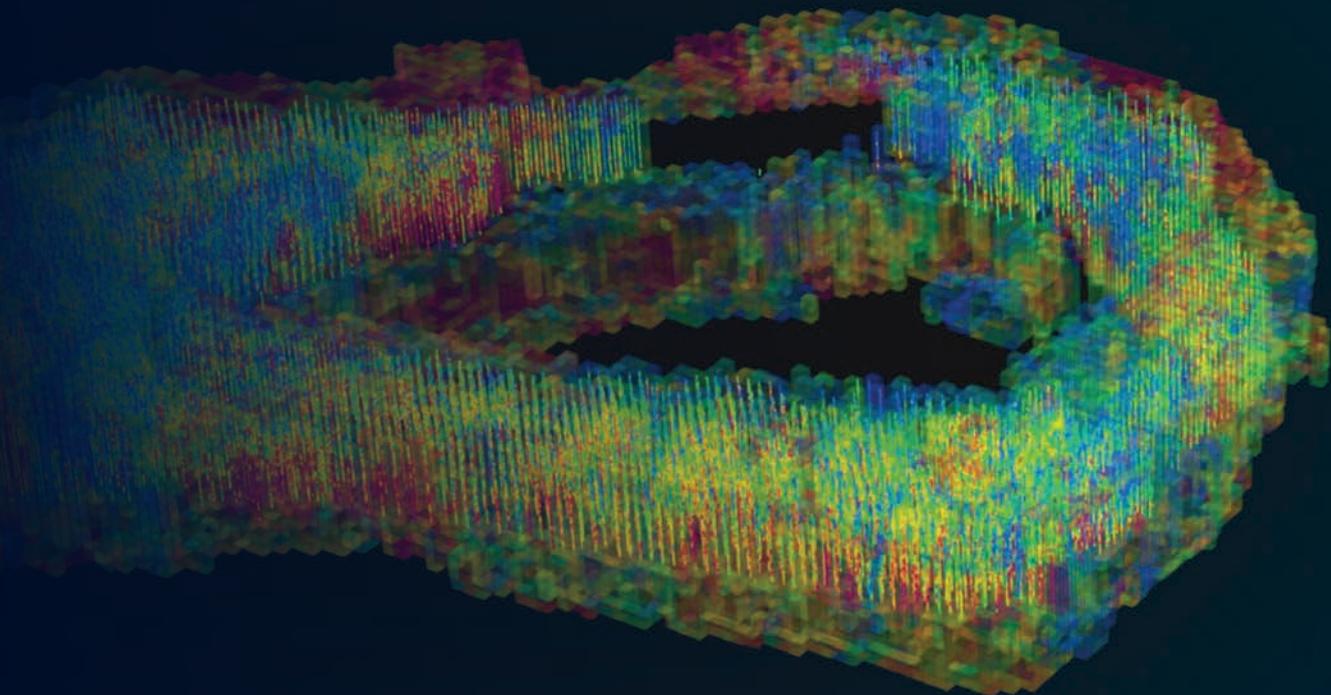
# Modern Slavery Statement

2023



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 clients to find, define and mine orebodies with precision, confidence and at speed.





## About This Statement

This Modern Slavery Statement (Statement) has been prepared by Imdex Limited (IMDEX) to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2023 (FY23). IMDEX is a publicly listed company on the Australian Securities Exchange. Unless otherwise stated, references to 'IMDEX', the 'Group', the 'Company', 'we', 'us' and 'our' refer to Imdex Limited (ABN: 78 008 947 813). References to a year are to the financial year ended 30 June (unless otherwise stated) and references to dollar figures are in AUD currency. This Statement forms part of our annual reporting suite, which includes our Corporate Governance Statement and FY23 Annual Report and Sustainability Report.



The reporting suite is available on our website at

**Corporate Governance Statement**

<https://www.imdexlimited.com/media/home/Corporate-Governance-Statement-FY23.pdf>

**FY23 Annual Report and Sustainability Report**

[https://www.imdexlimited.com/media/investors/IMDEX-AR-2023\\_Final.pdf](https://www.imdexlimited.com/media/investors/IMDEX-AR-2023_Final.pdf)

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The reporting entity covered by our FY23 Statement is IMDEX, which owns or controls over 40 subsidiaries. These subsidiaries are not reporting entities in their own right and undertake activities relevant to our core business in Africa, the Americas, Asia Pacific and Europe. The Statement was developed in consultation with owned or controlled entities.

Further information regarding this process is outlined on page 27.

## Approval

This statement is approved by the Board of Directors of IMDEX Limited, which is the principal governing body for the reporting entities.



**Anthony Wooles**

*Chairman of the Board of Directors, IMDEX Limited*

*14 December 2023*



**Paul House**

*Chief Executive Officer, IMDEX Limited*

*14 December 2023*

## Feedback and Further Information

We value all feedback. Please forward any comments or requests regarding our Modern Slavery to [legal@imdexlimited.com](mailto:legal@imdexlimited.com)





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LEADERSHIP SUPPORT



## LEADERSHIP SUPPORT

# CEO Forward

**One year ago, we were navigating the challenges brought about by the ongoing pandemic, which had profound implications for supply chains and businesses globally.**

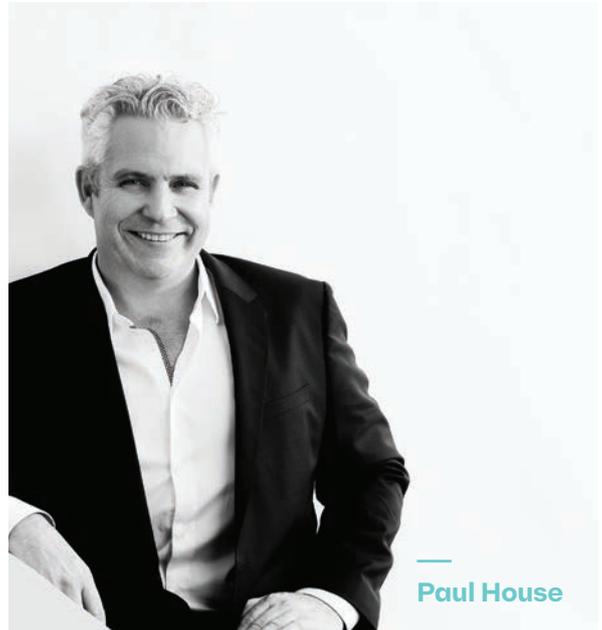
Roll forward to today, and the dynamic landscape of supply chains remains under constant scrutiny and adaptation in response to emerging challenges:

- Geopolitical tensions are not subsiding; rather, they are intensifying, prompting the re-examination and re-organisation of supply chains; and
- The escalating cost environment, particularly in North America and Australia, coupled with widespread low unemployment rates, is reshaping the conduct of business.

These external factors pose risks that challenge the standards to which we hold ourselves. They are also an important reminder that we must remain vigilant, consistently monitor, and continuously educate ourselves, our workforce, and our partners on compliance to uphold a high level of care within our supply chains.

I am pleased with the progress we achieved in FY23, especially with the successful acquisition and integration of Devico into our IMDEX group. Importantly, the culture and expectations of the Devico leadership closely align with our own, facilitating compliance and continuous improvement within our supply chains and global operations.

Looking ahead to the remainder of FY24, our focus includes an expanded commitment to modern slavery education and awareness. We acknowledge that we operate in multiple jurisdictions, each with diverse social standards, which may differ from the global benchmarks we set for ourselves.



Concurrently, we will enhance our third-party due diligence engagement and intensify our detailed interactions with our top 40 suppliers worldwide.

The significance of these initiatives to our customers is evident. Even more critical, however, is meeting the expectations of our own workforce – that we act responsibly within our industry and the markets.

My thanks to our teams for your commitment, your passion and for never taking short-cuts that may jeopardize our standards and values as a company.

A handwritten signature in black ink, which appears to read "Paul House". The signature is fluid and cursive.

**Paul House**  
*IMDEX Chief Executive Officer*

BUSINESS OVERVIEW

# Operations

**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 product offering includes 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. In February 2023 we extended our product offering with the acquisition of Devico.

We partner with drilling contractors and resource companies to provide integrated solutions that unlock real value and provide timely critical insights.

BUSINESS OVERVIEW

## Our Customer Value Proposition

The key to delivering value to our customers is to provide high quality data in real-time, facilitating improved decision-making opportunities and safer operating environments.

### Timely Information for Critical Decision Making




**Quality Data**

- Industry leading sensors
- QA/QC at point of data collection
- Digital workflows to reduce risk of human error
- AI and machine learning to remove human subjectivity



**Representivity**

- Cost effective methods allowing data to be collected for every metre drilled
- Repeatable sensor-based data (Internet of Geoscience)



**Time Saving**

- Actionable information in real-time
- Driller operable instrumentation
- Autonomous operations
- More efficient digital workflows

## Our Integrated Solutions

Our solutions fit within the following three broad categories - Drilling Optimisation Products, Rock Knowledge Sensors and Real-time Data & Analytics. Increasingly our focus is on providing solutions that integrate the categories to provide greater value to customers.

The Devico products complement each of our three categories. Our combined offering provides customers greater choice and the ability to match the right sensors to the right geological program.



### Drilling Optimisation Products

A suite of products that enhance drilling productivity while improving safety and the impact on the environment:

- Drilling fluids
- Solids removal units
- Rig alignment technologies
- Directional drilling technologies



### Rock Knowledge Sensors

Best-in-class sensors that originate critical data on the four elements of rock knowledge - location, grade, mineralogy and texture:

- Down hole survey sensors, including Devico Reference Gyro
- Core orientation sensors
- Gamma logging sensors
- Structural orientation sensors



### Real-Time Data & Analytics

A secure cloud platform and market leading geoscience analytical software to enrich data and enable real-time decisions to be made further upstream:

- Devico survey data management system (DeviCloud)
- Drilling analytics software
- Cloud-based data collection and validation platform
- Advanced reporting software
- Geoscience analytics software
- Interpretive mineralogy software
- 3D visualisation software

## Our Established Global Business

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

During FY23 we supported customers in more than 100 countries. We have 22 IMDEX facilities, together with warehouses and calibration centres in key mining regions of the world. Our Head Office is located in Balcatta, Western Australia.

The integration of Devico provides an additional 4 facilities, including a world-class R&D and manufacturing facility in Trondheim, Norway. This facility and its team of engineers, complement our existing capabilities in California and Australia.

Devico significantly strengthens our core business and global presence, particularly in Europe.



## Our Customers and Industry Partners

Our long-standing customer base includes large drilling contractors and tier-1 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.

Operating in all  
key mining  
regions  
of the world

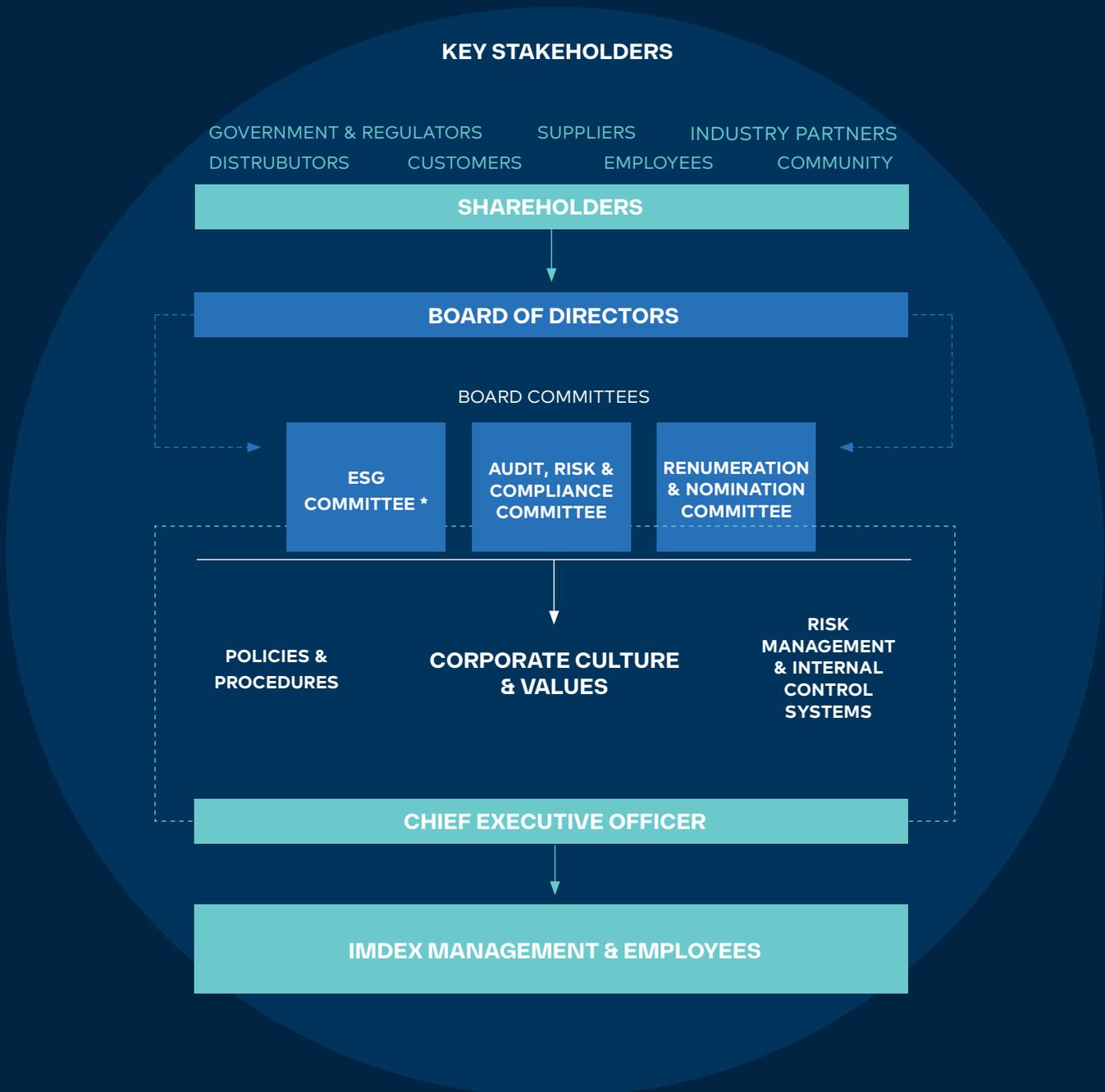
Sales in  
**100+**  
COUNTRIES

“ Our truly global footprint limits geographic risk and provides greater diversity and industry insights

Shaun Southwell, Chief Operating Officer

# Stakeholders

We are committed to providing our stakeholders with transparent and timely engagement to enhance and support their experience with our products and business globally.



*In FY24 the ESG Committee will become the Sustainability Committee reporting directly to the Board*

# Supply Chain

**IMDEX operates a complex global supply chain to meet the demands of our diverse product range. We procure raw materials, components and services, and deliver finished products and comprehensive business support. Our supply chains span Asia-Pacific, the Americas, Europe, and Africa.**

Our supply chain covers the following critical areas to ensure continued success:

- Sourcing raw materials and technical components for our manufacturing operations.
- Manufacturing drilling optimisation products, directional drilling equipment and rock knowledge sensors.
- Supporting development and maintenance of software.
- Rapid prototyping for engineering and R&D purposes.
- Efficient distribution and logistics to ensure fast response to client needs.
- Global service centres providing essential client support.



Our Supplier Code of Conduct available on our website at:

<https://www.imdexlimited.com/media/home/IMDEX-Supplier-Code-of-Conduct.pdf>

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MANAGING OUR MODERN SLAVERY RISKS



## MANAGING OUR MODERN SLAVERY RISKS

# Our Risk Management Approach

Identified risks are managed in line with our IMDEX policies and procedures, following the risk framework established by our Board and Executive Committee

Upholding IMDEX's policies is a collective responsibility, including directors, officers, contractors, and employees. Our Chief Executive Officer is accountable to the board for overseeing all matters related to company policies. We ensure awareness of these policies through training sessions and regular communications from the IMDEX Legal Team and Risk & Compliance Team.

POLICY	APPLICATION TO MODERN SLAVERY	IMPLEMENTATION OF IMDEX POLICY
<b>IMDEX Code of Conduct</b>	Ensures employee awareness and commitment to respecting human rights and zero tolerance for modern slavery.	Employees complete a formal online training module through IMDEX Academy, with periodic refresher training.
<b>Supplier Code of Conduct</b>	Ensures supplier awareness and commitment to zero-tolerance for modern slavery in the supply chain.	Suppliers are asked to review and confirm their commitment to the Code of Conduct through onboarding processes.
<b>Risk Management Policy</b>	Establishes the risk management framework to be used within IMDEX to identify, manage and report on risk (including modern slavery and supplier risks).	This policy is implemented through an internal risk management standard, systems, and support from the IMDEX Risk & Compliance Team.
<b>Compliance Policy</b>	Communicates the importance of compliance to our workforce and establishes the expectation to comply with relevant laws (which includes laws relevant to modern slavery).	This policy is communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.
<b>Sustainability Policy</b>	Establishes the commitment of IMDEX to corporate social responsibility and sets goals for improving sustainability.	This policy is communicated via our company website and Sustainability Reports.
<b>Speak Up Policy</b>	Establishes the procedures and processes through which confidential and anonymous reports of misconduct (such as modern slavery) can be made.	This policy is communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.



# Addressing Our Workforce Risk

## Our workforce is largely employed in roles and locations with inherently low modern slavery risk.

Most roles are filled by highly skilled professionals such as engineers, software developers, technicians, sales, human resources, and accounting. These roles are predominantly situated in areas with inherently low modern slavery risk such as Australia, Canada, the United States, Chile and Europe.

Our acquisition of Devico has expanded our global workforce into additional jurisdictions IMDEX was not previously operating in, and incorporates a broader level of international deployment supporting our direction core drilling activities. This service is resourced internally using skilled labour and operates in accordance with the relevant labour laws and conditions.

We are committed to transparent and ethical workforce management practices, prioritising a safe work environment and the welfare of our people. We establish standards for lawful and ethical recruitment, employment, and management of both employees and contractors. Our Human Resource Business Partners are integrated into all operations globally to support our workforce and ensure compliance with these standards.

## The following controls are used to mitigate the risk of modern slavery in our workforce:

- **Recruitment processes follow documented policies and procedures** which comply with local laws. Oversight is provided by our Human Resources Team.
- **Candidates under the legal working age** (identified by the relevant local standard) 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 or impose penalties** which could prevent workers from leaving their employment.
- **We do not charge internal fees or withhold wages** other than in compliance with local taxation and worker entitlements legislation.
- **Wages are based on benchmarks** for worker roles and industries and are regularly reviewed. Relevant local legislative minimum wages are met or exceeded.
- **Grievances can be raised** by workers with their line manager, an IMDEX Human Resources Team representative, or anonymously using our IMDEX Speak-Up platform.
- **Where conditions do not meet minimum standards**, appropriate action is taken, including disciplinary action, or reporting to local authorities (where appropriate) if misconduct is identified.
- **The IMDEX Code of Conduct** sets a binding standard of behaviour which all directors, officers, managers, employees, and internal contractors must follow.



Our policies are available on our website at:  
<https://www.imdexlimited.com/about-us/corporate-governance>

# Addressing Our Supply Chain Risk

**IMDEX sources components and materials from around the world to develop and manufacture our products in world-class facilities in Australia, the Americas, Africa and Europe.**

Our manufacturing supply chain is centralised to ensure effective and efficient production of IMDEX products. For example:

- Rock knowledge sensors are manufactured by IMDEX businesses in Australia, the Americas and Europe.
- Drilling optimisation and directional drilling equipment is manufactured by IMDEX businesses in Australia and Europe.
- Drilling optimisation fluids and chemical products are manufactured, blended or packaged by IMDEX businesses in Australia, the Americas, Europe and South Africa.

Components and raw materials are sourced from a combination of IMDEX subsidiaries and external suppliers. We have potential exposure to risk through external supply chains which may be affected by modern slavery in the production or delivery of raw materials and components. There may also be potential exposure in our non-manufacturing activities through external suppliers of goods and services, such as IT equipment, personal protective equipment and uniforms, and cleaning services.

Our supply chain risk management approach follows guidance material published by the United Nations and reputable human rights groups and is overseen at an executive leadership level by our Chief Operating Officer. We identify and monitor suppliers that are potentially high risk due to country and category risk factors. Some areas of potential exposure are shown opposite.



**IMDEX POTENTIAL EXPOSURE TO MODERN SLAVERY RISKS**

**Agricultural commodities & primary industry**

*Some drilling optimisation products are manufactured using agricultural and primary industry products, such as xanthan gum and vegetable oils.*

Less than 2% of our supply chain spend was with Tier 1\* suppliers in this category in potentially high-risk countries in East and South Asia.

**Electronic components**

*Rock knowledge and mining technology sensors contain electronic components.*

Less than 1% of our supply chain spend was with Tier 1\* suppliers in this category in potentially high-risk countries in East and Southeast Asia.

**Mineral resources & extractive Industries**

*Some drilling optimisation products use raw materials from extractive industries, such as bentonite.*

Less than 1% of our supply chain spend was with Tier 1\* suppliers in this category in potentially high-risk countries in South and Southeast Asia.

**Processing facilities for metals & waste**

*Some drilling optimisation and directional drilling equipment contain processed metals such as bearings. Manufacturing and operational activities produce waste.*

IMDEX did not have any Tier 1\* suppliers in this category in FY23 in high-risk countries.

**Cotton, textiles and derivatives**

*Some drilling optimisation products use raw materials which are derived from cotton.*

IMDEX did not have any Tier 1\* suppliers in this category in FY23 in high-risk countries.

**Cleaning, security and unskilled services**

*Some unskilled support services may be prone to modern slavery in higher risk countries.*

IMDEX did not have any Tier 1\* suppliers in this category in FY23 in high-risk countries.

\*Tier 1 suppliers are direct suppliers of goods and services to IMDEX.



## The identification of potential supplier risks is an integral part of our onboarding process and is managed by our supply chain teams.

Our Supplier Code of Conduct clearly outlines our minimum expectations for suppliers, their subsidiaries, and subcontractors. This code aligns with company values and firmly establishes our zero-tolerance position towards modern slavery.

Accountability for overseeing all IMDEX Policies, including modern slavery risk management, rests with our Chief Executive Officer, who reports to the Board. The Risk, Audit, and Compliance Committee oversee all aspects of risk management.

### The following controls are used to mitigate the risk of modern slavery in the supply chain:

- **Procurement follows documented procedures** and is carried out in accordance with the IMDEX Code of Conduct. Our Supply Chain Teams complete Code of Conduct training.
- **Supplier prequalification and onboarding processes** are used to evaluate new suppliers, including in relation to modern slavery indicators.
- **Due diligence** is done on a targeted basis depending on risk factors such as country and supply category. Third-party screening tools are used as appropriate to assess relevant risk factors.
- **Prospective suppliers may be audited** where due diligence identifies a significant risk of modern slavery exposure.
- **Supplier performance and compliance with our standards** (including in relation to modern slavery) is monitored by members of our Supply Chain Team.
- **Any employee can report suspected modern slavery relating to a supplier** to their line manager, an IMDEX Legal Team representative, or confidentially using the IMDEX Speak-Up platform.
- **The IMDEX Supplier Code of Conduct** sets a binding standard of behaviour which all suppliers are expected to follow. Suppliers are required to observe IMDEX's zero-tolerance position on modern slavery. IMDEX does not currently require that direct suppliers provide certification that materials supplied comply with local laws on modern slavery.

# Remediation

**IMDEX maintains a robust grievance reporting system to flag and investigate potential non-compliance or misconduct, including modern slavery incidents.**

Reports can be made by victims or their representatives (such as civil society organisations) through various channels including line managers, Human Resources Business Partners, regional and global Supply Chain Teams, the Executive Committee (XCO), or IMDEX Legal Team. Confidential and anonymous reporting is facilitated through the IMDEX Speak-Up online portal, which is accessible to all employees, their families, and suppliers and their extended workforce. IMDEX ensures the confidentiality of reports and prohibits reprisals or victimisation.

During FY23, no reports related to modern slavery were received, nor were any identified through audits or performance monitoring. If a complaint were received, it would be referred to the IMDEX Legal Team for investigation. Efforts would also be made to support and protect suspected victims. Substantiated modern slavery complaints would trigger remediation in line with the UN Guiding Principles on Business and Human Rights. This would include notification of relevant authorities (if appropriate) if a breach of the law was suspected.





## FOCUS AREAS

## FY23 Key Achievements

**In FY23 we progressed with continuous improvement of our modern slavery risk controls, including completing the commitments made in our FY23 Modern Slavery Statement.**

These included:

- Completion of initial testing of the updated supplier evaluation workflow and strengthening of third-party due diligence capabilities;
- Updating of our modern slavery risk assessment processes, enabling us to clearly identify higher risk areas within our operations; and
- Delivering modern slavery awareness training to a core group within the supply chain teams.

## FY24 Focus Areas

**We understand that managing modern slavery risks within our global business is a continuous process, requiring forward planning and a focus on continuous improvement.**

Throughout FY24 we will strengthen our capability to prevent and address modern slavery risks in our workforce and supply chains.

Our focus areas will be:

1. Expansion of modern slavery training to all participants in our Supply Chain Team;
2. Completion of our updated third-party due diligence system rollout across our businesses; and
3. Collection of questionnaires on modern slavery risk from our top 40 suppliers.



EFFECTIVENESS AND CONSULTATION

## EFFECTIVENESS AND CONSULTATION

# How We Assess Effectiveness

**Our Risk Management Policy emphasises the importance of control effectiveness in mitigating potential risks.**

Controls are implemented by frontline management and monitored by senior management and XCO. The ESG and Audit, Risk and Compliance Committees further oversee the effectiveness of our modern slavery control measures.

This monitoring is complemented in supply chain by targeted audits on specific suppliers to ensure they meet our requirements. Our Speak-Up mechanism encourages feedback from workers and suppliers, helping us to gauge control effectiveness and identify areas in our supply chain for improvement.

We are committed to continuous improvement in our approach to mitigating potential risk of modern slavery within our business. Refer to FY24 Focus Areas in this Statement for more on our specific commitments for the coming year.

# How We Consult with Owned and Controlled Entities

This Statement has been prepared by IMDEX in consultation with all owned or controlled entities (entities). The following methods of consultation were used:

- Our Risk & Compliance Team worked with stakeholders from relevant business units across all entities to collect and validate information.
- Our regional Human Resources Business Partners provided inputs on the risk exposure and risk controls within our workforce across all entities.
- Our regional and global Supply Chain Teams provided inputs on the risk exposure and risk controls within our supply chain across all entities.
- Our General Managers and senior management for each entity reviewed and contributed to this Statement.
- Our Directors and Officers for each entity reviewed and endorsed this Statement.

## ANNEX A

# Compliance with the Modern Slavery Act 2018

MODERN SLAVERY ACT 2018 (NO 153 OF 2018)		RELEVANT HEADINGS	PAGES
<b>S16(1)a</b>	Identifies reporting entity	About this statement	4
<b>S16(1)b</b>	Describes the structure, operations and supply chain of the reporting entity	Business Overview	10-15
<b>S16(1)c</b>	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	Managing our Modern Slavery Risks	17-23
<b>S16(1)d</b>	Describes the actions taken to assess and address modern slavery risks, due diligence processes, and remediation processes for operations and supply chains	Managing our Modern Slavery Risks	17-23
<b>S16(1)e</b>	Describes how the effectiveness of actions is assessed	Effectiveness and Consultation	27
<b>S16(1)f</b>	Describes the process of consultation with any entities that the reporting entity owns or controls	Effectiveness and Consultation	27
<b>S16(1)g</b>	Includes any other information that the reporting entity considers relevant	Throughout	3-27
<b>S16(2)a</b>	Includes the details of approval by the principal governing body of the reporting entity	About this statement	4





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