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INDEXTM

Modern Slavery Statement

2024



A dense forest of evergreen trees, likely spruce or fir, covers a hillside. The trees are dark green and appear to be in the foreground and middle ground. In the background, a line of trees marks the top of the hill against a clear, light blue sky. The lighting suggests it might be late afternoon or early morning, with some soft shadows.

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 Statement

This Modern Slavery Statement (**Statement**) has been prepared by Imdex Limited 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 legislative requirements for each jurisdiction in a consolidated manner except where information is identified as relevant to specific entities.


JURISDICTION	REPORTING ENTITIES	REGISTRATION	REPORTING YEAR
Australia	Imdex Limited Included: > 40 entities worldwide.	78 008 947 813	30 June 2024
Canada	Imdex Canada Limited	1000749968	30 June 2024
Norway	Devico AS Included: > 10 entities worldwide	947 402 633	30 June 2024

Consistent with our commitment to responsible business practices, this statement has also been prepared to meet the requirements of the UK Modern Slavery Act and Californian Transparency in Supply Chains Act. While IMDEX does not currently meet the reporting thresholds for these laws, we do operate in each of these jurisdictions.

Modern slavery is a complex issue that involves a range of serious exploitive practices, including slavery, forced labour, human trafficking and the worst forms of child labour. For clarity, this Statement uses the terms 'modern slavery and child labour' to refer to the exploitive practices that fall within the scope of the Australian and Canadian laws outlined above. Modern slavery and child labour also constitute violations of fundamental human rights and undermine decent working conditions.

Imdex Limited is a publicly listed company on the Australian Securities Exchange (ASX:IMD). Unless otherwise stated, references to 'IMDEX', the 'Group', the 'Company', 'we', 'us' and 'our' are used collectively to refer to all relevant entities in the Imdex Limited group. References to a year are to the financial year ended 30 June (unless otherwise stated) and financial figures are given in Australian dollars (AUD).

This Statement forms part of our annual reporting suite, which includes our Corporate Governance Statement, Annual Report and Sustainability Report.

 The reporting suite is available on our website at

Corporate Governance Statement

<https://www.imdex.com/getmedia/f507a278-8a90-463b-a419-2466a9fc8ddd/Corporate-Governance-Statement-FY24.pdf>

FY24 Annual Report

<https://www.imdex.com/investor/imdex-2024-annual-report>

FY24 Sustainability Report

https://www.imdex.com/getmedia/94bc2526-286b-4d06-b53f-be0ee7618aa9/IMDEX-SustainabilityReport24_v30.pdf

Consultation

This Statement has been prepared by IMDEX in consultation with all owned or controlled entities.

The following methods of consultation were used:

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

Feedback and Further Information

We value all feedback. Please forward any comments or requests regarding this Statement to:

compliance@imdexlimited.com

Approval

Australia

I attest that this statement was approved on 18 December 2024 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 18 December 2024 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 18 December 2024 by the Directors of Devico AS.



Paul House

Managing Director & Chief Executive Officer, Imdex Limited

Director, Imdex Canada Limited

Director, Devico AS

18 December 2024





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Leadership support

CEO Forward

In today's evolving global landscape, we must remain acutely aware of the shifting dynamics that shape our operating environment.

The past year has seen continued challenges driven by rising geopolitical tensions and an inflationary environment. These factors, alongside the pursuit of cost savings and productivity improvements, can inadvertently introduce risks across the jurisdictions where we operate and within the supply chains from which we source our products and talent.

To navigate this complexity, we are committed to continuing to allocate resources effectively, monitor emerging risks, and strengthen systems that enable us to measure, respond to, and mitigate potential impacts. Safeguarding the interests of all stakeholders remains at the core of our approach.

Over the past 12 months, we have been particularly pleased to witness greater cultural alignment and compliance across IMDEX which has seen us deliver on key commitments. Notable achievements include:

- **Expanding modern slavery awareness training** to all relevant participants in our Supply Chain Teams, with a particular focus on Devico team members who joined us over the past two years.
- **Rolling out an updated third-party due diligence system** across all IMDEX businesses, and prioritising the integration of new business units from Devico and DataRock.
- **Completing our first self-assessment questionnaire campaign** with our top 40 highest-spend and strategic suppliers, which has helped us refine our assessment of risk exposure in this critical segment of our supply chain.



Paul House

Looking ahead, our focus in FY25 will centre on the following strategic measures:

1. **Streamlining reporting formats** to meet the requirements of Australian, Norwegian, and Canadian modern slavery and transparency legislation.
2. **Finalising the deployment of our updated due diligence and governance framework** for Third Party Representatives.
3. **Building on insights from our FY24 self-assessment questionnaire campaign** by implementing further targeted actions.

These initiatives reflect our ongoing commitment to ethical practices, risk mitigation, and fostering transparency across our operations and supply chains. I am incredibly proud of our teams for their unwavering dedication, passion, and steadfast commitment to upholding our global standards and company values.

Paul House
IMDEX Chief Executive Officer





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 Values

Our organisational values are the foundation of IMDEX's culture, guiding the behaviours and decisions of all employees globally.

Our values - Go beyond, Forever curious, Global game changers, and Together we thrive - shape our collective identity and drive our commitment to innovation, customer satisfaction, and sustainable practices in the mining industry.

We're global game changers.



Our rich global experience and diverse thinking drives all development within IMDEX. It enables us to solve unique problems for global customers reducing environmental and social impacts to shape a better global industry.

We reduce the environmental impact of our activities to shape a better global industry.

We embrace flexible thinking for the benefit of our people, customers and the societies in which we operate.

We serve our customers globally by leveraging our diverse teams and enabling inclusive decision making.

We connect our expertise to customers to add values.

Forever curious.



We believe in shaping the future of mining through the relentless pursuit of technologies and services that question the status quo, address our customers' challenges and set new benchmarks for what can be achieved in our industry.

We listen to our people and customers to develop new technologies.

We step up and challenge the status quo.

We give our people the space to be curious and create. We are informed by industry trends to be open to new ideas.

By embodying these values, our employees are empowered to create positive customer experiences, challenge the status quo, embrace diverse perspectives, and foster a collaborative work environment. This alignment with our core values enables IMDEX to cultivate a cohesive and inclusive work environment where every team member contributes to the sustainable growth and success of IMDEX.

We go beyond.



We are passionate about creating positive customer experiences that deliver successful outcomes for our customers now and into the future.

We achieve this by working in partnership with our customers, actively listening to their needs and delivering genuine value through efficient solutions.

We optimise our customers' experience.

We place our customers' needs first and foremost, delivering on our promises.

We encourage customer ownership and involvement.

We create value for our customers through collaboration and innovation.

Together we thrive.



We are a global team of diverse and talented people, who empower each other to be our best selves.

We harness our strengths by combining our knowledge across boundaries in a positive and accountable workplace.

We hold each other accountable and take ownership for our actions.

We advocate for the safety and wellbeing of our people in everything we do.

We recognise and acknowledge each other's successes.

We back each other as a united team, by sharing learnings and expertise between departments and across borders.

Our Integrated Solutions

Our integrated solutions fall into three key categories: **Drilling Optimisation Products**, **Rock Knowledge Sensors**, and **Real-time Data & Analytics**.

We focus on delivering comprehensive solutions that combine products and services from these categories, maximising productivity and value for our customers.



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. The combined offering provides customers greater choice and the ability to match the right sensors to the right geological programme:

- Down hole survey sensors
- 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:

- Drilling analytics software
- Cloud-based data collection and validation platform
- Advanced reporting software
- Geoscience analytics software
- Interpretive mineralogy software
- 3D visualisation software



Our Customer Value Proposition

The key to delivering value to our customers lies in providing high-quality real-time data, enabling better decision-making and enhancing operational safety.

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 Established Global Business

IMDEX's global presence is unparalleled, offering a unique opportunity to deliver real value to our customers while maximising revenue and earnings. We serve customers in over 100 countries, supported by 26 IMDEX facilities, together with warehouses and calibration centres in key mining regions worldwide. Our Head Office is located in Perth, Western Australia.

In 1H24, we successfully completed the operational integration of Devico, which includes a world-class R&D and manufacturing hub in Trondheim, Norway. This facility, along with its team of engineers, enhances our existing capabilities in California and Australia. The acquisition of Devico has significantly strengthened our core business and global footprint, particularly in Europe.



Our Customers and Industry Partners

Our long-standing and broad customer base includes major drilling contractors and resource companies within the global minerals industry. We are building a collaborative ecosystem, partnering with customers to optimise orebodies and promote responsible resource stewardship.

Operating in all
key mining
regions
of the world

Sales in
100+
COUNTRIES

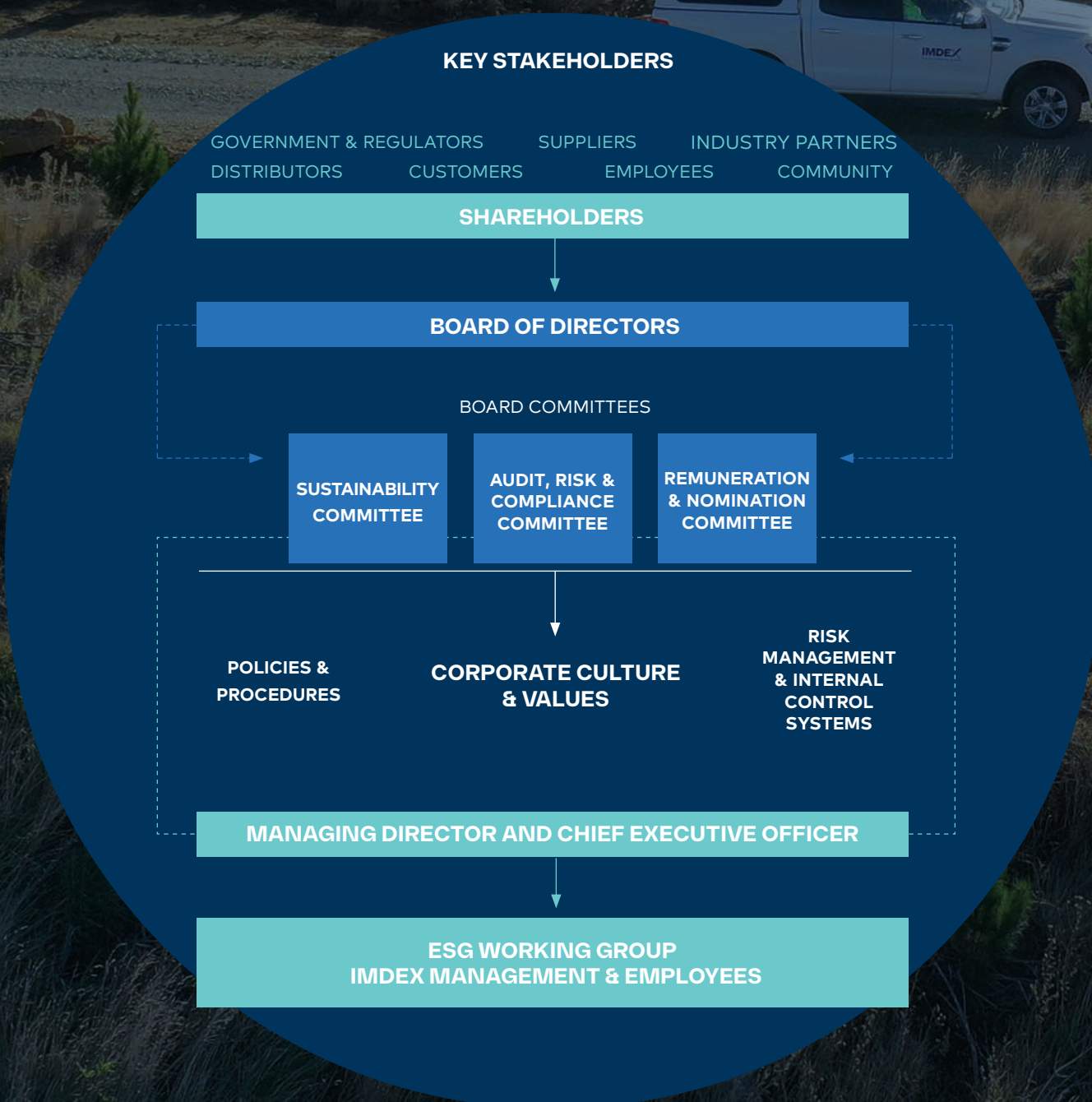
Collaborating
with drilling
contractors
and resource
companies

IMDEX engages Third Party Representatives to support our logistics, lead generation and technical support. This allows us to extend our market reach and to deepen our support for customers in core markets.

IMDEX's network of Third Party Representatives provides coverage for customers in over 40 countries. We carefully vet prospective partners to validate that they can meet IMDEX's high standards for ethics, quality, and customer service. These partners are contracted with our regional businesses and partner with our local teams to service our customers.

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.



Our Supply Chain

At IMDEX we manage a complex global supply chain for our product range. We purchase raw materials and components and deliver finished products and business support through supply chains in Asia-Pacific, North America, South America, Europe and Africa.

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

- Suppliers of raw materials and technical componentry for drilling optimisation products and rock knowledge sensors
- Manufacturing of drilling optimisation products and rock knowledge sensors
- Fast turnaround prototyping for engineering and R&D
- Distribution and logistics ensuring rapid response to the changing needs of our customers
- Global service centres to support customers.

Where technically and commercially viable, we prioritise maximising local procurement—sourcing supplies from within the same country where IMDEX manufactures and operates. In FY24, approximately 70% of our purchases were made through local suppliers.



Our Supplier Code of Conduct available on our website at:

<https://www.imdex.com/getmedia/601ccd90-03bc-43a8-922e-d84a6b1aa2a8/UD-IMDEX-Supplier-Code-of-Conduct.pdf>





Managing Our Risk Exposure

Policies & Risk Management Framework

This section deals with IMDEX's approach to risk management and due diligence for modern slavery, child labour, and human rights.

The IMDEX risk management framework is established by the IMDEX Board and the Executive Committee. This includes the policies shown below which apply to all IMDEX entities.

POLICY	HOW THE POLICY SUPPORTS THE FRAMEWORK	IMPLEMENTATION
Global Code of Conduct	Establishes employee awareness and commitment to respecting human rights, diversity and inclusion, anti-discrimination, privacy, and zero tolerance for slavery.	Employees complete annual online training through Imdex Academy. Third Party Representatives confirm their commitment during onboarding.
Supplier Code of Conduct	Establishes supplier awareness and commitment to the same code of conduct as described above for IMDEX employees.	Suppliers review and confirm their commitment during onboarding.
Risk Management Policy	Establishes the risk management framework, including management of modern slavery, child labour and human rights risks.	Regular training, support, and compliance monitoring by our Legal, Risk & Compliance Team.
Compliance Policy	Establishes the framework for regulatory compliance, includes compliance with modern slavery and human rights laws.	Regular training, support, and compliance monitoring by our Legal, Risk & Compliance Team.
Diversity Policy	Establishes our commitment to workplace diversity from all backgrounds, supported by delegated procedures to protect against discrimination, harassment and bullying.	Implemented through business procedures and reinforced in people and culture initiatives.
Health, Safety & Environment Policy	Establishes our commitment to workplace health and safety, including measures to promote worker participation in managing health and safety issues.	Implemented through business procedures and engagement activities as part of our health and safety management system.
Sustainability Policy	Establishes our commitment to corporate social responsibility, ethical business practices, and providing a safe and inclusive global workplace.	Implemented through business procedures and reported publicly through our Sustainability Report.
Speak Up Policy	Establishes processes for confidential and anonymous reporting of misconduct, harassment, bullying, modern slavery exposure and other human rights concerns.	Regular awareness campaigns and prominent displays of the reporting portal details.



These policies are available on our website at:
<https://www.imdex.com/about/corporate-governance>



Upholding IMDEX's policies for modern slavery, child labour and human rights is a collective responsibility between our directors, officers, executives, employees and contractors.

These responsibilities are promoted to all IMDEX stakeholders through regular training and communications overseen by the Legal, Risk & Compliance Team (see more in Training & Accountability below).

The alignment of the IMDEX risk management framework to the OECD Due Diligence Guidance for Responsible Business Conduct is shown below.

OECD DUE DILIGENCE GUIDANCE ELEMENT	OPERATIONS (WORKFORCE)	OPERATIONS (THIRD PARTY REPRESENTATIVES)	SUPPLY CHAIN
1. Embedding responsible business conduct	<ul style="list-style-type: none"> • Code of Conduct • Code of Conduct training • Ethics Declarations 	<ul style="list-style-type: none"> • Code of Conduct • Code of Conduct commitment • ABAC training 	<ul style="list-style-type: none"> • Supplier Code of Conduct • Code of Conduct commitment
2. Identifying & assessing impacts	<ul style="list-style-type: none"> • Human Resources policies • Screening & due diligence checks • Ethics declarations • Performance & professional development programs • Speak Up reporting 	<ul style="list-style-type: none"> • Governance policies • Screening & due diligence checks • Questionnaires • External due diligence • High risk list • Speak Up reporting 	<ul style="list-style-type: none"> • Supply Chain policies • Screening & due diligence checks • Questionnaires • Audit program • High risk list • Speak Up reporting
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)		
6. Providing for remediation	Remediation		

Operations

Risk Exposure & Potential Adverse Impacts

IMDEX operates a global business model supported by a network of Third Party Representatives to reach our customers.

Our workforce is diverse, inclusive, and aligned to our technical leadership position in the market. The composition of our workforce is inherently lower risk for modern slavery, child labour and human rights:

- Most positions are **skilled** roles, many of which are classed as professional or management roles (~67%) which are comparatively lower risk for modern slavery, child labour and broader human rights risks: roles such as engineers, technical sales representatives, software developers and professional support services.
- Most of our workforce (~70%) is based in comparatively **lower risk regions** for modern slavery, child labour and broader human rights risks: such as Australia, North America and Europe.
- Most roles (~95%) are **permanent employee** arrangements which are comparatively lower risk for exploitative work practices. IMDEX makes limited use of temporary employment arrangements.

Our Third Party Representatives develop sales opportunities, deliver products and provide support to our customers. Our Third Party Representatives are classified as Channel Partners or Resellers depending on their relationship with us. The extent of business support services provided to IMDEX varies on a case-by-case basis. Their workforces are also generally comprised of skilled workers such as drilling specialists, sales representatives and logistics which are comparatively lower risk for modern slavery, child labour and broader human rights risks.

We do not operate or supply into comprehensively sanctioned countries (which typically also have unacceptably high human rights risk). This includes countries such as Iran, North Korea, Russia, Belarus, Syria and Myanmar.

IMDEX accordingly has not identified any significant risks of modern slavery, child labour or other human rights risks in its workforce, though we note potential areas of exposure in the table opposite.



Workforce in South America

We employ personnel in South American countries including Peru, Ecuador and Colombia. These countries are reported as having a higher prevalence of modern slavery, forced labour and child labour.

We employ fewer than 50 workers across these countries, all of whom are in skilled roles such as logistics, finance and technical sales. Our workers are not in sectors such as agriculture, artisanal mining or logging which are higher risk in these countries. As such we do not consider this to be a significant risk exposure for IMDEX.

Workforce in Asia

We employ personnel in Asian countries including Hong Kong, India and Indonesia. These countries are reported as having a higher prevalence of modern slavery, forced labour and child labour.

We employ fewer than 20 workers across these countries, all of whom are in skilled technical sales roles. Our workers are not in sectors such as agriculture, textiles or electronics which are higher risk in these countries. As such we do not consider this to be a significant risk exposure for IMDEX.

Operations in Africa, the Middle East and Asia

Our employees provide on-site support for customers, including in countries such as Democratic Republic of Congo, Saudi Arabia, Turkey and Pakistan. These countries are reported as having a higher prevalence of modern slavery, child labour and human rights risks.

Our support personnel are skilled technical specialists who travel to support our customers when required. Our workers do not provide support in agriculture, unskilled labour, textiles, electronics or other sectors which are higher risk in these countries. As such we do not consider this to be a significant risk exposure for IMDEX.

Third Party Representatives in Africa, the Middle East and Asia

We have Third Party Representatives in countries such as Democratic Republic of Congo, Saudi Arabia, Turkey, India, Indonesia and Pakistan. These countries are reported as having a higher prevalence of modern slavery, child labour and human rights risks.

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



Workforce Due Diligence & Risk Management

IMDEX operates a robust human resource management system which is implemented and monitored by professional Human Resource Teams 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 on our website at:
<https://www.imdex.com/about/corporate-governance>

We ensure that our people have access to fundamental human rights and decent working conditions. We also comply with relevant laws and regulatory requirements related to modern slavery, child labour and broader human rights, such as legislation around health and safety, and workers' pay and conditions.



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

- Recruitment follows documented procedures aligned to compliance with local laws. Support and oversight are provided by our Human Resources Business Partners.
- Candidates under minimum working age (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 or impose penalties which could prevent workers from leaving their employment.
- We do not withhold wages (other than in compliance with local taxes, and worker entitlements or court-ordered garnishments) or charge internal fees or penalties. 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.
- Our workers are free to associate, organise, and participate in trade unions in accordance with local laws.
- We operate health, safety and environment management systems to ensure that our people are safe at work. We encourage worker participation and provide regular training.
- We have clear policies prohibiting discrimination, harassment and bullying. Workers are provided with ongoing training on these policies and IMDEX values.
- Our workers and managers complete annual ethics declarations to confirm their ongoing commitment to responsible business conduct.
- Grievances and concerns can be raised by workers with their manager, their local Human Resources Team representative, 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).

Third Party Representatives Due Diligence & Risk Management

IMDEX operates a 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 and policies 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 in the jurisdictions in which they represent IMDEX.



Our Global Code of Conduct and policies are available on our website at:
<https://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 evaluate potential Third Party Representatives, their ultimate beneficial owners and directors.
- Our contracts with Third Party Representatives contain legal 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.
- Third Party Representative performance and behaviours are monitored and managed by IMDEX account managers throughout their tenure.
- Any IMDEX employee or Third Party Representatives can report suspected modern slavery or human rights issues to their 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 complex global supply chain to source components, materials and services to deliver our products to customers.

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

Our manufacturing supply chain includes:

- Rock knowledge sensors and other instrumentation products manufactured by IMDEX businesses in Australia, the United States and Norway.
- Drilling optimisation and directional drilling equipment manufactured by IMDEX businesses in Australia, Norway and Germany. Some of our machinery is manufactured using suppliers in Europe.
- Drilling optimisation fluids and chemical products manufactured, blended or packaged by IMDEX businesses in Australia, the Americas and South Africa. Some products are manufactured by suppliers in Asia, Europe, Africa and the Americas.

Our manufacturing businesses procure from a combination of other IMDEX businesses and suppliers. We have potential risk exposure through suppliers which could be affected by slavery in the production or delivery of raw materials.

Our non-manufacturing supply chain includes activities such as logistics, technical support, commercial and other business support functions. These may also have potential risk exposure through suppliers of goods and services used in these functions.

We have noted areas of potential exposure in the table opposite.

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 such as lubrication 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 vegetable oils, SLES and other agricultural raw materials from suppliers in Australia, the Americas and Europe.

We source xanthan gum from suppliers in Asia.

We have not identified any particular risk of modern slavery and child labour among our Tier 1 suppliers.

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 source uniforms (produced from textiles) for our own workers.

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 uniforms from local suppliers in Australia, the Americas and Europe. We source most of our cotton-based cellulose raw materials from suppliers in Europe.

We have not identified any particular risk of modern slavery or child labour among our Tier 1 suppliers.

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.

Lithium-ion batteries (containing coltan) 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.

We source most of our mineral-based drilling fluid raw materials from suppliers in Australia, the United States and Europe. Our spend included two smaller suppliers in Asia.

We source most of our lithium-ion batteries from suppliers in the United States, Europe and Australia.

We have not identified any particular risk of modern slavery or child labour among our Tier 1 suppliers.

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.

We also use 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 and IT equipment from suppliers in Australia, the United States and Europe.

We have not identified any particular risk of modern slavery or child labour among our Tier 1 suppliers.

Supply Chain 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 is the underpinning standard which sets out our expectations from suppliers. This includes a strict zero-tolerance position towards modern slavery. Suppliers affirm their commitment to this standard as part of their engagement with IMDEX.



Our Global Code of Conduct and policies are available on our website at:
<https://www.imdex.com/about/corporate-governance>

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

IMDEX does not appoint suppliers identified as being linked to comprehensively sanctioned countries (which typically also have unacceptably high human rights risk). This includes countries such as Iran, North Korea, Russia, Belarus, Syria and Myanmar.



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.
- Supplier prequalification and onboarding processes are used to evaluate suppliers against a range of risk criteria, including the modern slavery, child labour and human rights risk profile 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 and monitoring using our due diligence software, which is then reviewed internally.
- Any red flags for modern slavery, child labour and human rights 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 deemed to be higher risk for modern slavery, child labour or human rights. These audits are conducted by an independent auditor and focus on slavery risk indicators, human rights, workplace health and safety, and living wage. Audits are generally planned and communicated in advance (i.e. our audits are not unannounced).
- We carry out self-assessment questionnaire campaigns which require our high-spend and/or higher risk suppliers to provide specific information about their risk exposure and policy frameworks.
- Supplier performance and 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 currently does not require Tier 1 suppliers to certify that the materials supplied to IMDEX are compliant with relevant laws regarding slavery and human trafficking. We do require suppliers to comply with our Supplier Code of Conduct which prohibits involvement in slavery.

Training & 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 our training modules and require that trainees complete periodic refresher training.

Our Code of Conduct training is developed with support from an external provider and 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 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 **people** complete our 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.

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 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 maintains grievance reporting systems and compliance incident investigation processes to identify and address any potential instances of modern slavery, child labour, or broader human rights issues.

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

Confidential and anonymous reporting is available through our Speak-Up online reporting portal. We use digital reporting software to ensure that this mechanism is accessible and that reports are protected. Submissions to our reporting software 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 on our website at:
<https://www.imdex.com/about/corporate-governance>

Reports can be made directly to: 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 FY24. 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 the affected individuals and their families. 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 FY24 Sustainability Report contains more details on these programs.



Our FY24 Sustainability Report is available on our website at:
https://www.imdex.com/getmedia/94bc2526-286b-4d06-b53f-be0ee7618aa9/IMDEX_SustainabilityReport24_v30.pdf



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.

Risk controls and actions to address adverse impacts 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 Teams, Supply Chain Teams and Global Operations Support Team.

We also take insights into control effectiveness from the various due diligence processes that are used 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 FY24, 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 & Focus Areas 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.





Annual Performance & Focus Areas

FY24 Key Achievements

In FY24 we continued our iterative improvement and strengthening of our modern slavery risk controls. We also completed several key commitments which were made in our FY23 Modern Slavery Statement.

These included:

- Expansion of modern slavery and child labour awareness training to relevant participants in our Supply Chain Teams. This particularly included the key Devico team members that joined our business over the last 2 years.
- Completion of our updated third party due diligence system rollout across all IMDEX businesses. This particularly focused on new business units introduced to IMDEX in the last 2 years from Devico and DataRock.
- Completion of our first self-assessment questionnaires campaign with our top 40 highest-spend and strategic suppliers. This has assisted in refining our assessment of risk exposure relating to this segment of our supply chain.

FY25 Focus Areas

IMDEX remains committed to continuous improvement and strengthening of our safeguards for modern slavery, human trafficking, forced labour, child labour and human rights.

In FY25 we will implement the following strategic measures:

1. Consolidation and streamlining of our reporting formats for Australian, Norwegian and Canadian modern slavery and transparency legislation (this Statement).
2. Completion of the deployment of our updated due diligence and governance framework for Third Party Representatives.
3. Development and completion of further actions based on the learnings from our FY24 self-assessment questionnaires campaign.

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	4
Describes the structure, operations and supply chain of the reporting entity	s16(1)b	Business Overview	13-21
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	26-27
		Risk Exposure & Potential Adverse Impacts	
		Supply Chain	32-33
		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	Policies & Risk Management Framework	23
		Operations	28-30
		Due Diligence & Risk Management	
		Supply Chain	34-35
		Due Diligence & Risk Management	
Describes how the effectiveness of actions is assessed	s16(1)e	Remediation	37
		Assessing Effectiveness	39
Describes the process of consultation with any entities that the reporting entity owns or controls	s16(1)f	Consultation	5
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	6

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	13-21
Describes policies and due diligence processes in relation to forced labour and child labour	s11(3)(b)	Policies & Risk Management Framework	23
		Operations	
		Due Diligence & Risk Management	28-30
		Supply Chain	
		Due Diligence & Risk Management	34-35
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	26-27
		Supply Chain	
		Risk Exposure & Potential Adverse Impacts	32-33
Describes any measures taken to remediate any forced labour or child labour	s11(3)(d)	Remediation	37
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	37
Describes the training provided to employees on forced labour and child labour	s11(3)(f)	Training & Accountability	36
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	39
Approval of the report by the reporting entity's governing body	s11(4)	Approval	6

Norway - Åpenhetsloven

	SECTION	RELEVANT HEADINGS	PAGES
A general description of:			
• The enterprise's structure and area of operations	s5(a)	Business Overview	13-21
• Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions	s5(a)	Policies & Risk Management Framework	23
		Operations Due Diligence & Risk Management	28-30
		Supply Chain Due Diligence & Risk Management	34-35
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	26-27
		Supply Chain Risk Exposure & Potential Adverse Impacts	32-33
		Remediation	37
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)	Policies & Risk Management Framework	23
		Operations Due Diligence & Risk Management	28-30
		Supply Chain Due Diligence & Risk Management	34-35
		Annual Performance & Focus Areas	41

This Statement also conforms with the legislation shown below but is not currently required to be submitted 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	28-30
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	28-30
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	28-30
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 & Accountability	36
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 & Accountability	36

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	13-21
Information about the organisation's policies in relation to slavery and human trafficking.	s54(5)(b)	Policies & Risk Management Framework	23
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	28-30
		Supply Chain Due Diligence & Risk Management	34-35
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)	Operations Risk Exposure & Potential Adverse Impacts	26-27
		Due Diligence & Risk Management	28-30
		Supply Chain Due Diligence & Risk Management	32-33
		Risk Exposure & Potential Adverse Impacts	34-35
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	39
Information about the training about slavery and human trafficking available to the organisation's staff.	s54(5)(f)	Training & Accountability	36





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