

# **MODERN SLAVERY STATEMENT 2025**



# OUR REPORTING SUITE 2025

We produce a suite of annual reporting documents to meet regulatory requirements and the needs of our stakeholders.

## Modern Slavery Statement

This Modern Slavery Statement 2025 (Statement) covers the financial year commencing 1 October 2024 and ending 30 September 2025. It has been approved by the Board of Orica Limited and the Board of Orica Mining Services Pilbara Pty Ltd.

## Environmental, social and governance data

Detailed data relating to environmental, social and governance (ESG) indices are provided in our ESG Data and Frameworks Pack, which can be accessed at [orica.com/sustainability](https://orica.com/sustainability).

## The reporting suite 2025

The entire [reporting suite 2025](#) is available at our website and includes our:

- Annual Report 2025,
- Corporate Governance Statement 2025,
- Tax Transparency Report 2025, and
- Modern Slavery Statement 2025 (this document).

Throughout our reporting documents, unless otherwise indicated, we refer to Australian dollars (AUD). All amounts are subject to rounding.

## Enquiries

Enquiries about our reporting documents and data can be directed to [companyinfo@orica.com](mailto:companyinfo@orica.com).

## Forward-looking statements disclaimer

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

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

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# MESSAGE FROM OUR MANAGING DIRECTOR AND CEO



Orica is committed to upholding human rights across our operations and value chain. We recognise that with our global presence comes responsibility and an opportunity to drive positive change. We are actively addressing the risks of modern slavery and encouraging ethical practices within our business and among our stakeholders. Our focus is on meaningful action that protects people and promotes human dignity throughout the regions in which we operate.

Modern slavery is a worldwide problem affecting millions of people. It involves the serious exploitation of people and can take many forms such as forced labour, deceptive recruiting, human trafficking and child labour. As a global leader in mining and infrastructure solutions, we have a responsibility to keep people safe and address modern slavery risks.

Safety is our highest priority at Orica—not only the safety of people directly employed by Orica but also those indirectly connected to our business through communities, suppliers and partners. We are determined to protect the rights and dignity of everyone connected to our operations, while building a culture of awareness and shared responsibility.

We are guided by international frameworks, including the United Nations Universal Declaration of Human Rights and the conventions of the International Labour Organization.

This year we acted on the findings of our global working groups and developed methods, in conjunction with key partners, to improve awareness of modern slavery risks across our global value chain. We refreshed our modern slavery awareness training, delivering it across the business and also implementing training for suppliers in high-risk regions.

We are leveraging data-driven tools to gain greater insights into our value chain and those of our suppliers, strengthening expectations and controls. We have made it our policy to embed robust modern slavery clauses into all new supplier contracts and have revisited agreements with suppliers identified as high risk. In continuing to promote our independently hosted, multilingual Speak Up service we are empowering our employees and contractors to report any concerns, safely and anonymously.

We understand that our stakeholders—our people, investors, customers, suppliers and the communities we are part of—expect us to act responsibly and transparently. We share these expectations and are continuing to strengthen our efforts year on year.

This Modern Slavery Statement 2025 reflects our commitment to respecting human rights and operating in line with our values and legal obligations. We will continue to strengthen our efforts, driving meaningful change within our network and across the broader industry, as we contribute to the global effort to eradicate modern slavery.



**Sanjeev Gandhi**  
Managing Director and Chief Executive Officer

# OVERVIEW

This year, we continued to deepen our understanding of the risks of modern slavery across our global operations and value chain as we aim to protect the safety and dignity of people connected to our business activities.

This Modern Slavery Statement 2025 (Statement) aims to promote transparency and accountability in how Orica is addressing modern slavery risks across its operations and value chain.

As a leading global organisation, we operate in many countries around the world and our approach reflects a multi-jurisdictional awareness. We have developed this Statement pursuant to:

- Australia's *Modern Slavery Act 2018 (Cth)*,
- United Kingdom's *Modern Slavery Act 2015*,
- The *Norwegian Transparency Act* (Åpenhetsloven 2021), and
- Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (2023).

This year, we have embedded targeted modern slavery initiatives across our operations and value chain:

- Expanding our approach to due diligence across the value chain to generate data-driven insights into modern slavery risks and mitigation,
- Revising our modern slavery risk management plan to incorporate our supply chain and operations,
- Updating our supplier and contracted-labour contracts and making it our policy to include revised modern slavery clauses to strengthen our ability to manage modern slavery risks effectively,
- Conducting regional workshops with subject matter experts, upskilling and empowering teams across our global business,
- Focusing on improving the governance and visibility of our modern slavery working group across the business,
- Launching regional modern slavery working groups to drive local engagement and accountability,
- Refreshing our Human Rights at Work Policy to reinforce our commitment to ethical labour practices,
- Enhancing our modern slavery training program to include multilingual delivery,
- Increasing operational-level awareness of grievance mechanisms and reporting channels, and
- Commencing our first SEDEX (Supplier Ethical Data Exchange) SMETA (SEDEX Members Ethical Trade Audit) assessment to ensure an independent audit of our practices.

## Our values

Our global team, working across different time zones and geographies, remains united by our values and our charter, which ensure we remain aligned with Orica's purpose, vision and strategy.



### Safety is our priority. Always.

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



### We respect and value all.

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



### Together we succeed.

Collaboration makes us better, individually and collectively.



### We act with integrity.

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



### We are committed to excellence.

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

# OUR BUSINESS STRUCTURE AND VALUE CHAIN

Our extensive global manufacturing and supply network comprises strategically located continuous and discrete manufacturing operations, technical centres, monitoring sites, support offices and a network of joint ventures that ensure uninterrupted supply for our customers in more than 100 countries.

## Our business

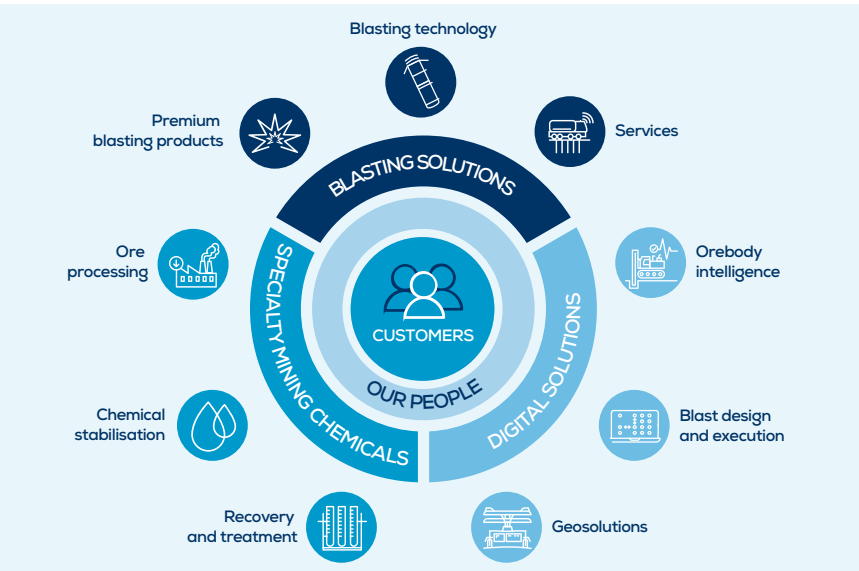
Orica is a global leader in mining and infrastructure solutions, and our purpose is to sustainably mobilise the earth's resources. Orica's value chain spans global manufacturing, logistics and customer partnerships, underpinned by responsible procurement.

Our continuous manufacturing operations comprise five ammonium nitrate facilities, three sodium cyanide plants, an ammonia facility and an emulsifier plant. We also operate 20 discrete manufacturing facilities, which are strategically located throughout the regions in which we operate: Australia, Pacific and Asia; Europe, the Middle East and Africa; Latin America; and North America. We operate a network of plants and technical centres that produce explosives, specialty mining chemicals and digital solutions, supported by joint ventures and depots throughout the world. We move materials safely across complex logistics networks and collaborate with our customers to co-develop solutions that enhance safety, sustainability and performance. Our supply chain teams manage Orica's global spend with an increasing focus on ethical procurement with local and Indigenous businesses.

Orica Limited is the ultimate holding company of the Orica group of companies (being those entities controlled by it at year-end or from time to time during the financial year). Orica Limited is listed on the Australian Securities Exchange (ASX: ORI) and its principal place of business is located at 1 Nicholson St, East Melbourne, Victoria, Australia. Further details about Orica are provided in our Annual Report 2025, available at our [website](#).



## Our value chain



### Three business segments

Our business is organised into three segments: Blasting Solutions, Digital Solutions and Specialty Mining Chemicals, which are supported by an additional segment that is not revenue generating—Orica's Global Support segment.

Global Support plays a critical role in maintaining Orica's global footprint, enabling scalability, and supporting innovation, safety and sustainability initiatives across the entire value chain. It enables Orica's three revenue-generating segments to operate efficiently and consistently across our customer sites in more than 100 countries.

## Blasting Solutions

Our Blasting Solutions business delivers explosives and advanced blasting systems to mining, quarrying and infrastructure industries around the world. The business operates through an extensive network of manufacturing plants that produce ammonium nitrate and other essential blasting components. The movement of raw materials and finished products is managed through our robust logistics network that ensures safe transportation by road, rail, sea and air.

## Digital Solutions

Our Digital Solutions business produces advanced software, monitoring devices and sensors that transform operations through data, analytics, insights and automation tools. These digital solutions support decision-making across the value chain, enhancing safety, sustainability and productivity. While this segment does not include large-scale manufacturing facilities, it plays a critical role in advancing sustainable productivity across mining, quarrying and construction and enables the responsible extraction of minerals.

## Specialty Mining Chemicals

Our Specialty Mining Chemicals business is the world's largest mining-dedicated chemicals business. Specialty Mining Chemicals focuses on the production and supply of critical chemical inputs, particularly sodium cyanide for gold extraction. It also includes emulsifiers and reagents tailored to metallurgical processes. The business' global supply chain spans continents, and logistics teams coordinate complex shipments of hazardous materials and intermediates, ensuring secure and compliant delivery to sites.

## Our approach

Orica's Human Rights at Work Policy is designed to promote ethical standards throughout the extraction and processing of minerals and orebodies that are vital to a low-carbon future. The policy seeks to prevent exploitative labour practices and unsafe working conditions, supporting responsible conduct across the entire value chain. As the demand for critical minerals grows to support the transition to a low-carbon economy, Orica places strong emphasis on human rights due diligence. This approach helps ensure that progress is achieved without compromising ethical values or the wellbeing of communities. Through a commitment to responsible sourcing, Orica strives to ensure that the materials it extracts and the processes used remain free from forced labour, unsafe practices and environmental harm.

## Our supply chain and operations

Our operations are supported by a dynamic and complex global supply chain that procures goods and services in the categories listed in the table below. Our regions primarily conduct their own purchasing, obtaining products and services from local and international suppliers. In 2025, products and services were procured from more than 15,900 suppliers in over 85 countries.

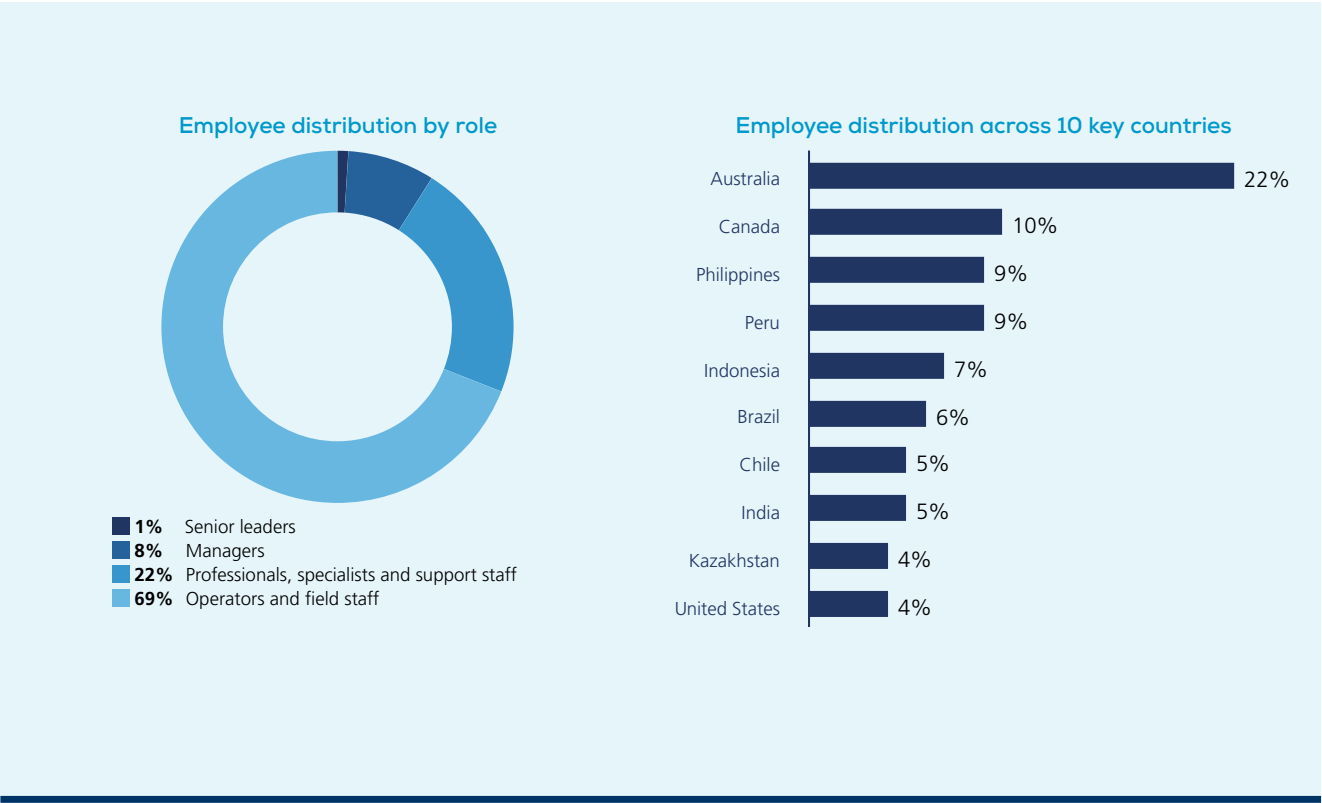
At Orica, we aim to engage with suppliers that share our dedication to excellence, embody our values, are devoted to conducting business ethically, and scrutinise their environmental and social impacts. In collaboration with our suppliers, we are committed to addressing sustainability challenges and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

Category	Description of goods and services
Continuous manufacturing	Bulk materials, primarily ammonia, ammonium nitrate, ammonium nitrate emulsion, sodium cyanide, emulsifiers, caustic soda and gas.
Discrete manufacturing	Individual items used as raw materials for the production or assembly of blasting and digital systems, or procured as products to be used onsite.
Corporate	Supports products and services, including information technology, software and hardware, travel and consultants.
Indirect	Products and services procured to support operations, including maintenance, repair and operations services.
Logistics	The movement, storage and distribution of goods and services across international networks to meet worldwide operational and customer demands.

## Our people

Our global team of more than 14,000 employees<sup>1</sup> comprises engineers, scientists, technologists, business specialists, people in frontline operations, office staff and approximately 450 contract workers<sup>2</sup> who support our customers in surface and underground mines, quarries, construction sites and oil and gas operations across more than 100 countries.

Globally, approximately 3,375 of our employees are involved in direct manufacturing. About 80 per cent of our workforce is located in 10 countries. We prioritise the safety of people above all else, and are driven by our core values. Details of our approach to safety are provided in the Annual Report 2025, available at our [website](#).



## Our workforce structure

<div>98.8%</div> <div>Permanent full-time</div>	<div>7.7%</div> <div>Fixed-term</div>	<div>32.7%</div> <div>Covered by agreements</div>
<div>0.8%</div> <div>Permanent part-time</div>	<div>0.4%</div> <div>Casual</div>	<div>22.1%</div> <div>Female workforce participation</div>

1. Includes our total workforce based on controlled operations (excludes the Group's share of non-controlled operations and joint ventures) at 30 September 2025.  
2. Includes individuals engaged through third-party providers on a temporary basis, where their work is directed by Orica. This data reflects the number of contract workers recorded in Orica's human resources system at 30 September 2025.







## Our global operations and high-spend countries

Orica services customers in more than 100 countries. Across our global operations, 10 countries account for over 80 per cent of our global procurement spend<sup>1</sup> and represent the core locations of our global workforce, operations and supply chain footprint.

The map indicates the estimated prevalence of modern slavery in the countries Orica operates in, according to the Walk Free Global Slavery Index<sup>2</sup> (GSI). The GSI estimates the level of vulnerability to modern slavery per country. Vulnerability scores range from one to 100 with higher scores indicating increased vulnerability.

### Regional summary<sup>3</sup>

A snapshot of the number of employees, contract workers, percentage of spend and number of suppliers by region.

#### Australia Pacific and Asia

**6,500** employees  
**414** contract workers  
**37%** of spend  
**5,806** suppliers

#### North America

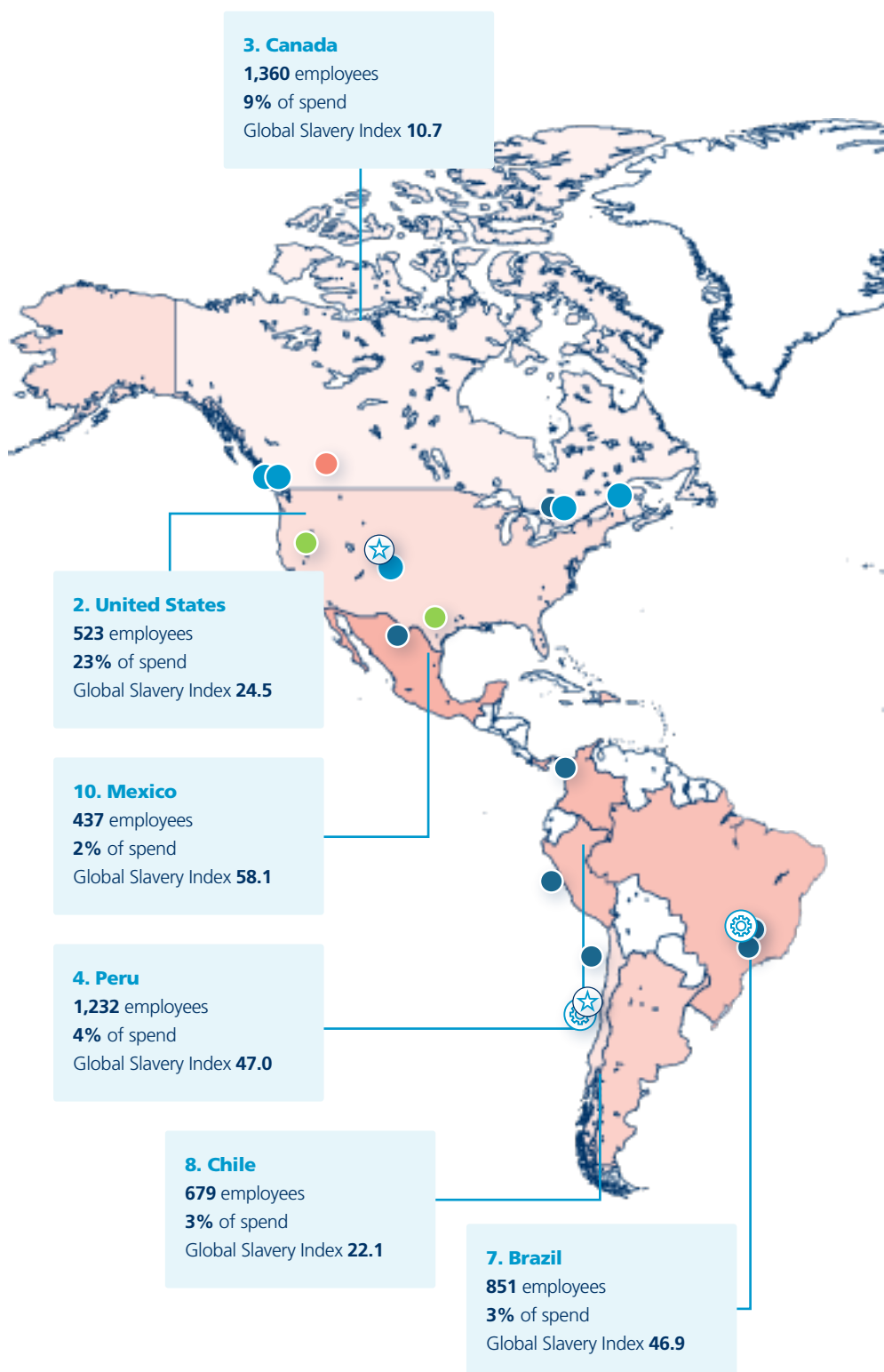
**2,344** employees  
**21** contract workers  
**32%** of spend  
**3,105** suppliers

#### Europe, the Middle East and Africa

**2,163** employees  
**3** contract workers  
**18%** of spend  
**4,146** suppliers

#### Latin America

**2,875** employees  
**3** contract workers  
**13%** of spend  
**2,902** suppliers



1. Total spend includes capital and operating expenditure paid and excludes spend such as intercompany payments, taxes, employee payments, expenses and spend from non-controlled operations. Spend by country is derived from data in Orica's global enterprise resources planning system and may reflect the location of a supplier's corporate entity or office and not the location of delivery or consumption of products and/or services.
2. The [Walk Free Global Slavery Index](#) (GSI) estimates vulnerability across five risk variables: governance, lack of basic needs, inequality, disenfranchisement and the effects of conflict.
3. Includes total workforce based on controlled operations (excluding the Group's share of non-controlled operations and joint ventures) at 30 September 2025.

**\$5.6bn**

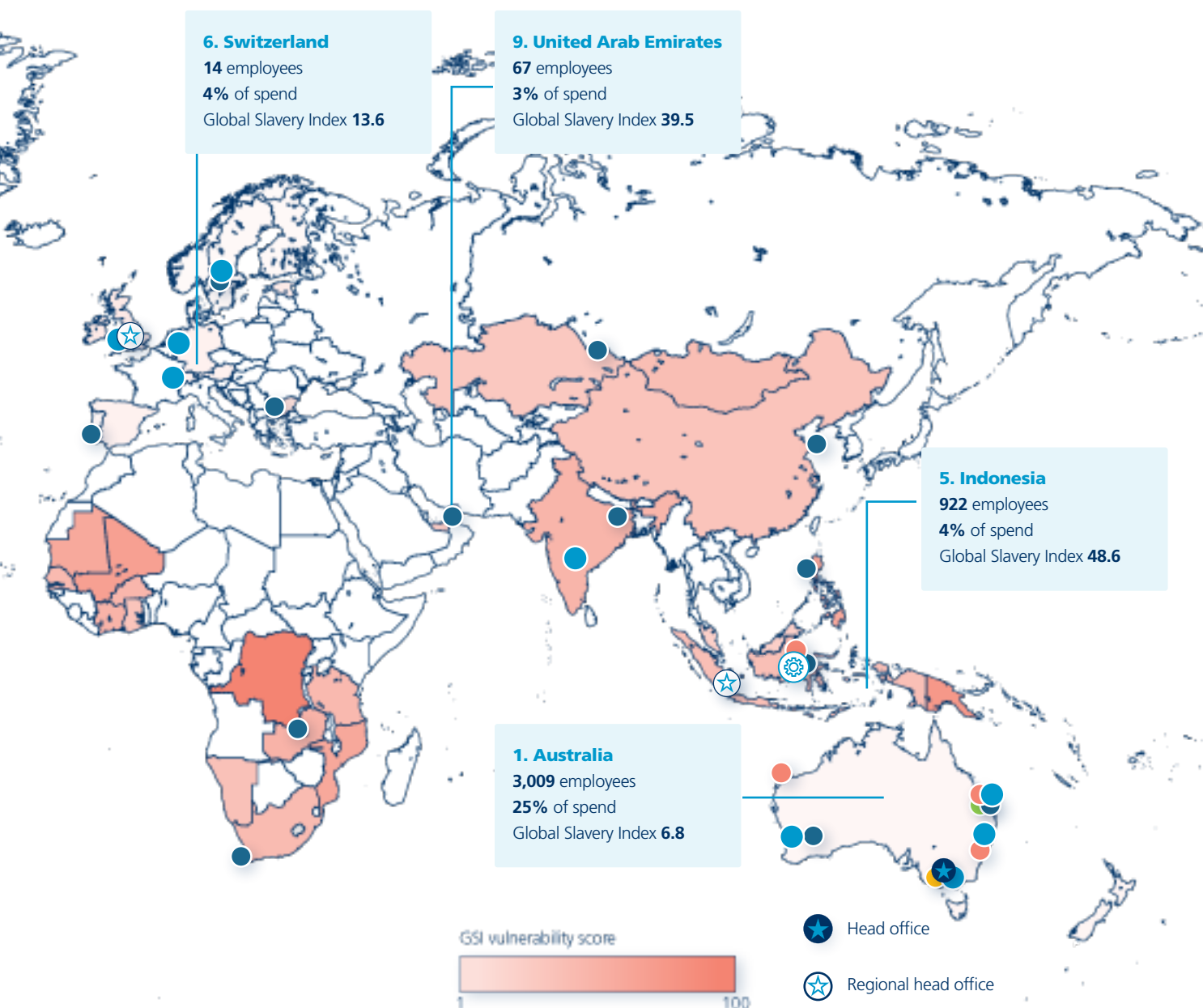
Total spend

**85+**

Countries in the supply chain

**15,900+**

Number of suppliers



## Understanding our spend (%)



- Raw materials and feedstock
- Transport and logistics
- Fleet, equipment and maintenance
- Corporate services and facilities management
- Contractual labour and site services

# IDENTIFYING RISK

As a leading global organisation, our approach to preventing modern slavery risk aligns with the legislative frameworks of several countries, including Australia, Canada, Norway and the United Kingdom.

Orica adopted a new approach (see page 16) to identifying modern slavery risk across its supply chain in 2025, supported by a specialised provider. We continued to implement our modern slavery action plan, developed from our 2023 enterprise-wide modern slavery risk assessment. Insights are shaping enhancements to our human rights risk-identification methodology and enabling us to prioritise high-risk activities requiring targeted modern slavery due diligence, beyond our standard processes.

In the table below, countries in which there is a high level of inherent risk are categorised as high-risk geographies and have been defined using a risk-assessment tool, which overlays revenue and external data.

Areas of focus	Modern slavery risk factors
Operations and/or offices in countries with heightened human rights risks	<p>Risks associated with workforce and onsite contracted labour, including deceptive recruitment, underpayment of wages and health and safety concerns.</p> <p>Geographies with high levels of inherent risk: Brazil, China, Colombia, Democratic Republic of Congo, Ghana, India, Indonesia, Kazakhstan, Mexico, Peru and the Philippines.</p>
Manufacturing sites	<p>Risks associated with workforce and onsite contracted labour, including lack of visibility around indirectly hired and temporary workers, and health and safety concerns.</p> <p>Geographies with high levels of inherent risk: Brazil, China, Colombia, India, Indonesia, Kazakhstan, Mexico and Peru.</p>
Non-operated joint ventures and equity investments in countries with increased human rights risks	Risks associated with lack of oversight and operational control: Orica may be unknowingly linked to adverse impacts.
Mergers and acquisitions activity	Risks arising from engaging with entities or entering markets with limited regulatory oversight, complex supply chains or potentially concerning business practices that may conceal exploitative labour conditions or human rights violations.
Customers operating in countries with increased human rights risks	Risks associated with entering and operating in geographies with high modern slavery risks.
Contractors and subcontractors	<p>Risks associated with complex layers of subcontracting and lack of transparency, encouraging exploitative labour practices, including underpayment of wages, and health and safety concerns.</p> <p>Risks related to workers in certain areas of service provision, such as cleaning, logistics and security.</p>

# RISK MANAGEMENT AND REMEDIATION

We are committed to upholding and advancing the human rights of our employees and the people connected to our business. This section details the actions we have taken in 2025 to assess and address modern slavery risks across our operations and value chain. Our governance structure and policies demonstrate our dedication to ethical, safe and sustainable practices.

## Modern slavery governance

The Orica Limited Board, through its Board Audit and Risk Committee, oversees material risks—including ethics and compliance risks such as modern slavery. The Board reviews and approves our Modern Slavery Statement each year.

Our modern slavery governance structure is outlined below.

The Orica Board	
The Board oversees modern slavery risk and the Orica Group's compliance with modern slavery legislation.	
Board Audit and Risk Committee	
The Board Audit and Risk Committee supports the Board in fulfilling its responsibilities by overseeing the effectiveness of Orica's processes and systems that manage risk, ensure legal and regulatory compliance, and detect, report and prevent inappropriate business conduct.	
Business Conduct Committee	
The Business Conduct Committee is an Executive Committee that assists the Board Audit and Risk Committee by taking reasonable steps to ensure the:	
<ul style="list-style-type: none"> <li>• Effective implementation of policies, including the Orica Code of Business Conduct (Our Code) and the standards and procedures for conduct, ethics and compliance,</li> <li>• Effective performance of the systems that underpin the secure and confidential use of our Whistleblower Policy, and</li> <li>• Appropriate investigative processes and responses to reported concerns.</li> </ul>	
Our whistleblower protection adviser	Our business conduct team
<p>The whistleblower protection adviser:</p> <ul style="list-style-type: none"> <li>• Assists whistleblowers and people considering reporting,</li> <li>• Provides advice to investigators about how to protect whistleblowers from detriment, and</li> <li>• Escalates matters to the Business Conduct Committee where appropriate.</li> </ul>	<p>The business conduct team:</p> <ul style="list-style-type: none"> <li>• Receives all reports made through the Speak Up service,</li> <li>• Receives all reports raised internally by our people involving allegations of non-compliance with Our Code, and</li> <li>• Assigns responsibility for investigation, maintains oversight of investigations and any resultant actions, and provides ongoing reporting to the Business Conduct Committee.</li> </ul>
Modern slavery working group	
<p>The modern slavery working group has global, cross-functional representation and comprises senior leaders with accountability for individual functions. The working group includes representatives from our Sustainability, Legal, Ethics and Compliance, Global Supply Chain, Human Resources, and Risk and Assurance teams.</p> <p>Orica's President – SHES, Discrete Manufacturing and Supply is the executive sponsor of the modern slavery working group, which meets bi-monthly, including for workshops, and is involved in the review of this Statement.</p>	

## Our policies

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

The table below outlines the key policies that form our strategy for managing the risks associated with modern slavery. In addition to these, we maintain a suite of policies that address sustainability, anti-harassment, diversity, equity and inclusion, and anti-bribery and corruption. Orica policies can be accessed at [orica.com/governance](https://orica.com/governance).

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

## Speak Up service

We launched a global campaign to raise awareness of the Speak Up service—an independent and confidential reporting service—and ensure everyone who works with Orica is aware of, and understands how to safely report any concerns they may have.

## Modern slavery training

### Employee training

All employees and contractors are subject to the requirements of the Orica Code of Business Conduct and must complete mandatory training when joining Orica. Refresher courses are provided periodically throughout the employment life cycle to reinforce awareness and compliance.

In 2025, Orica expanded its modern slavery training program, with more than 90 per cent of relevant workers completing the training:

- Delivery in multiple languages across all regions,
- Flexible format options, including online modules, offline sessions, toolbox talks, summary sheets and posters,
- Expanded mandatory employee target groups, including frontline and supervisory roles, contract workers and employees in Orica's Safety, Health, Environment and Security (SHES), Legal and Human Resources teams, and
- A multilingual training program for external suppliers, delivered in regions categorised as high risk.

### Supplier training

In addition to the training program developed for our people, we launched a tailored external training module specifically for suppliers. It is designed to be simple to use and provides autonomous access, with the capability for Orica to track supplier participation.

## Managing operational risk

### Safety

Safety is our first priority at Orica. It is fundamental to our operational integrity and risk management framework. Health, safety and environmental risks are closely monitored, particularly in high-risk settings such as the manufacture, handling and transportation of explosives.

In 2025, we continued to embed our Major Hazard Management (MHM) program across our global operations, ensuring critical safety controls and verification processes are in place. All workers are empowered to stop work immediately if they suspect or identify a potential hazard. Whenever a worker stops or refrains from starting an activity due to a critical control being potentially absent or ineffective, an MHM stoppage is logged. MHM stoppages are regularly reviewed and considered alongside other performance trends to support organisational learning and continuous improvement.

Our transport equipment is designed to meet Orica's internal safety standards and comply with national and international regulations for dangerous goods. These measures support our broader commitment to identify and mitigate risks of modern slavery, especially in high-hazard operational contexts and complex supply chains.

### Human rights in the workplace

At Orica, the labour risks associated with our direct operational workforce are managed by the Human Resources team. The team ensures employees are offered contracts and benefits that reflect the standards of local markets and comply with applicable employment laws and obligations.

Our updated Human Rights at Work Policy, published in 2025, outlines our stance on human rights and reinforces our dedication to fair remuneration, reasonable working hours and a workplace free from discrimination, harassment, bullying or vilification. It affirms our prohibition of forced and child labour and our compliance with international standards, including the United Nations Guiding Principles on Business and Human Rights and key conventions of the International Labour Organization.

The policy applies to all Orica employees and third parties we engage with and sets clear expectations for workplace behaviour, performance and respect for privacy. We have mechanisms in place to ensure concerns can be raised confidentially and addressed fairly and promptly.

### Business partner selection

Orica's policies specify that, before working with a business partner—defined as any person or entity interacting with other parties on behalf of Orica or an Orica-controlled

entity—internal due diligence activities are required to identify operational, security, compliance and reputational risks.

The Ethics and Compliance team conducts a screening process and any business partner identified as high-risk may be subject to more extensive due diligence—such as a review of criminal, regulatory and civil records, and/or media searches for potential human rights violations.

Before a high-risk business partner is engaged, approval is required from the regional Ethics and Compliance Manager who may advise on further actions to address identified risks.

Orica's policies also require the inclusion of appropriate clauses related to modern slavery, anti-bribery and corruption, and trade sanctions compliance for all new business partner contracts. The clauses may include the right to audit compliance and terminate a contract in the event of a breach.

### Contracted labour risks

In 2025, we deepened our focus on modern slavery risks linked to third-party and contracted labour, with regional working groups driving targeted action across high-risk geographies and roles. Our Human Resources and Supply Chain teams worked collaboratively to refine engagement practices, supported by updated contract clauses, supplier assessments and site-level audits.

Our regional working groups led initiatives to:

- Enhance oversight and controls for non-employee workers and outsourced services, including through improved visibility and risk-based supplier follow-ups,
- Align policies and procedures across regions, embedding modern slavery safeguards into procurement and operational processes, and
- Expand access to training and support materials in local languages, and promote human rights awareness through site inductions, toolbox talks and grievance mechanism reviews.

We continue to strengthen regional accountability, deepen supplier engagement and enhance protections for vulnerable worker groups across our operations and supply chains.

### Acquisition risks

When considering potential acquisitions, we conduct ethics and compliance due diligence to identify and manage associated risks.

As we strive to understand potential human rights and modern slavery exposures across the value chain, our focus is on assessing the geographies in which rental and sales

activities occur, equipment is manufactured and exclusive distributors are engaged.

### Country-entry risks

Growth opportunities for Orica may be present in countries with heightened operational, security, compliance and reputational risks.

One of the measures in place to manage these risks is our country-entry procedure, which is applied prior to:

- Entering a customer relationship in a country where Orica has not conducted sales in the previous two years, and
- Establishing a presence in a country in which Orica is not yet present.

The country-entry procedure involves a risk assessment and governance committee endorsement, with specific attention given to modern slavery and human rights risks prior to final approval being sought.

### Internal audit function

Our modern slavery risk management program is supported by various business functions, including our internal audit function, which provides independent and objective assurance aligned with Orica's strategy and risk management framework. Audits are conducted on controls for managing ESG risks and opportunities.

In 2025, some internal audits conducted in the regions of North America, Europe, the Middle East and Africa included some coverage of modern slavery risks, reinforcing our commitment to continuous improvement and regional accountability. Going forward, consideration may be given to expanding the audit into other regions and including a modern slavery component in the annual internal audit plan, where relevant and appropriate.

### External audit

In 2025, Orica joined SEDEX and engaged an independent auditor to carry out a SMETA assessment at selected sites. SMETA is a globally recognised audit methodology that assesses labour standards, health and safety, environmental practices and business ethics.

The process includes a site tour, confidential worker interviews, document reviews and management meetings, culminating in a report and corrective action plan to support continuous improvement. This initiative reinforces our commitment to ethical sourcing and transparency across our operations.



## Managing supply chain risk

We continue to conduct thorough assessments of our global supply chain, with particular emphasis on supplier engagement. Suppliers are categorised based on factors influencing exposure to modern slavery risk: country of incorporation; the nature of goods and/or services; control measures in place; and reported risk events. We prioritise additional due diligence and engagement strategies for suppliers identified as higher risk. It is our policy that all new and high-risk supplier agreements include a comprehensive forced-labour clause, setting out our expectations that suppliers:

- Maintain appropriate policies and deliver relevant training on modern slavery,
- Undertake all reasonable measures to prevent and address instances of modern slavery, and
- Establish effective mechanisms for reporting actual or suspected cases of modern slavery.

### Due diligence

Throughout our operations, supply chain personnel are guided by a comprehensive modern slavery risk management plan. The plan offers detailed guidance and resources to assist in identifying and addressing modern slavery risks during procurement activities—methods, timing and due diligence frequency, depending on the assessed risk level. Audits are conducted by employees supported by local teams. Robust pre-qualification evaluations are also performed before incorporating materials or products into our operations. If a concern related to modern slavery arises, the supplier is required to implement an effective corrective action plan in order to supply Orica.

### Supplier management

In 2025, Orica adopted a more streamlined and data-driven approach to supplier management through a new risk management service, which uses a platform to scan our entire global supply chain—up to 10 tiers deep—and, drawing on public data sources, generates a dashboard that categorises each supplier according to:

- Inherent risk, derived from a supplier's location and type of product and/or service.
- Control measures implemented—evaluated and categorised as preventative, detective, corrective and directive, with the potential to reduce inherent risk.
- Residual risk—the level of risk remaining after the application of control measures to mitigate inherent risk.
- Specific data drawn from public registries, supply chain transparency data, industry memberships, proprietary information, public disclosures and media reports.
- Risk events—specific instances recorded in enforcement registers, including government-imposed business sanctions, trade restrictions and workplace

infractions such as underpayment of wages, discrimination, and health and safety violations.

Suppliers are analysed using artificial intelligence tools that assess voluntary and involuntary frameworks—licensing registers, ethical certifications, workplace accreditations, enforcement databases and location and product data.

The platform's dashboard delivers detailed reports for each supplier, which are reviewed by our Ethics and Compliance team. Once approved, each supplier report is forwarded to the modern slavery risk advocate in the relevant region, who:

- Identifies the supplier and procurement contact,
- Assesses the supplier contract, with regard to renewal dates and the presence/absence of the strengthened modern slavery clause,
- Works towards establishing a new contract containing appropriate modern slavery clauses, as required,
- Provides access to our multilingual supplier training module, and
- Engages with the supplier, to develop a tailored roadmap for strengthening controls.

This rigorous process, supported by appropriate modern slavery clauses and our new risk management service, ensures our supplier management framework is robust, transparent and responsive to evolving risks across our global operations and supply chain. We will continue to leverage the data in 2026 to inform targeted engagement, regional action plans and continuous improvement.

### Managing category risk

Over 50 per cent of global cobalt reserves are from Democratic Republic of the Congo. Child labour is widespread, particularly in small-scale mines, accounting for up to 30 per cent of cobalt production<sup>1</sup>. We successfully transitioned our operations at Yarwun (Australia) and Bontang (Indonesia) to catalysts that contain lower overall quantities of cobalt and continue to assess the feasibility of catalyst replacements, engaging with suppliers to ensure the presence of robust controls across our supply chain.

### Collaboration

Orica deepened its collaborations with industry stakeholders, clients, peers and official agencies to enhance our approach to modern slavery risk and foster positive outcomes for affected people. Building on our 2024 commitment as a signatory to the United Nations Global Compact (UNGC), we prepared our first 'Communication on Progress' report and actively engaged with the UNGC's training platform and Modern Slavery Community of Practice, which enabled

Orica's modern slavery working group to access best-practice resources and collaborate with peers. We partnered with Monash University to benchmark and improve our disclosure practices. These efforts reflect our commitment to continuous improvement and transparency in addressing modern slavery risks.

### Workshops

We deepened our engagement in 2025, conducting regional workshops to engage and equip local teams with the skills and tools to address modern slavery risks in their geographies. Sessions supported the facilitation of regional key performance indicators and strengthened our people's awareness and abilities in addressing modern slavery.

### Supporting survivors of human trafficking

In 2025, Orica partnered with an initiative in Tanzania, Africa, which was brought to our attention by one of our team members. Through the Orica Impact Fund and in collaboration with the Daughters of Mary Immaculate, we are supporting the rehabilitation and empowerment of young girls who have been rescued from human trafficking.

Our contribution has helped to establish a new training and education centre, which officially opened in December 2024.

At the centre, survivors receive psychological care and health support to aid their healing journey. Learning facilities and vocational programs are teaching practical skills in tailoring, agriculture, computing and self-defence, equipping survivors with the skills and independence for future employment.

This initiative reflects our commitment to human rights and modern slavery awareness. It aims to create long-term pathways to dignity and opportunity, including potential careers in mining. Orica is proud to continue this partnership throughout 2026, supporting the expansion and ongoing operation of the centre through the Orica Impact Fund.

1. Save the Children International, 2024: [savethechildren.net/news/job-doesnt-deserve-me-catch-clubs-help-stop-child-labour-drc-s-deadly-cobalt-mines](https://savethechildren.net/news/job-doesnt-deserve-me-catch-clubs-help-stop-child-labour-drc-s-deadly-cobalt-mines).



## Remediation

### Raising concerns

We are committed to ensuring everyone can raise concerns freely and without fear. Concerns are dealt with swiftly, fairly and confidentially using our Speak Up service and through authorised channels, in accordance with our Whistleblower Policy.

The Speak Up service is a multilingual service, available across each region via a hotline, website or mobile device. Reports can be made anonymously and all reporters are protected from reprisals or detriment. The confidentiality of reports and the identity of reporters are maintained in accordance with applicable laws.

In 2025, we received 244 whistleblower reports, equivalent to 1.8 reports per 100 employees. The adjacent charts show the percentage of reports that were investigated versus those not pursued, and the breakdown of report types by category and outcome.

The number of reports received, based on benchmarking supplied by our independent Speak Up service provider, represents a rate that is high enough to demonstrate broad employee awareness of whistleblowing processes but low enough to indicate there are not excessive issues and grievances. Our reporting rates and insights in this area are reported to the Board twice a year.

There were no reports involving allegations of modern slavery or a failure to uphold human rights in 2025. We note that Orica is not aware of any impact on vulnerable families as a result of any steps taken to eliminate forced labour or child labour.

Additional information about our Whistleblower Policy and whistleblower reports can be found in our ESG Data and Frameworks Pack, available at our [website](#).

### Investigating and providing remedy

All whistleblower reports are treated with utmost respect and managed in accordance with our Whistleblower Policy and the Orica Code of Business Conduct. Orica is committed to complying with all applicable legal requirements throughout investigation and remediation processes.

### Investigation outcomes

Outcomes are reported to appropriate stakeholders including the reporter, if they have chosen to be contacted. Orica makes a commitment to providing the reporter with regular updates on the progress and conclusions of any investigation if they have chosen to receive these.

Where a modern slavery incident has been identified, Orica is committed to acting in the best interests of the individual affected and, where the company has caused or contributed to the issue, suitable remediation is offered.

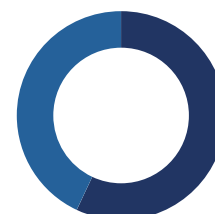
### Ongoing improvement

Orica remains committed to the ongoing improvement of our investigation and remediation procedures. Relevant data is reviewed quarterly and benchmarked against industry standards with regard to the number of reports, intake channels, anonymity rates, allegation types, investigation timelines and substantiation rates.

Outcomes are consolidated at global and regional levels for internal assessment. Where trend analysis reveals emerging issues, action plans are developed to identify and address underlying causes.

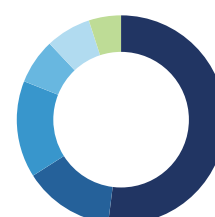
### Reports 2025:

#### Investigated or not pursued



■ 57% Proportion of reports investigated  
■ 43% Proportion of reports not pursued

#### By category



■ 52% HR, diversity and workplace respect  
■ 14% Business integrity  
■ 15% Workplace grievances  
■ 7% Misuse or misappropriation of assets  
■ 7% Environment, health and safety  
■ 5% Accounting and financial reporting

#### By outcome



■ 61% Proportion of reports investigated that are fully or partially substantiated  
■ 39% Proportion of reports investigated that are unsubstantiated

# ASSESSING EFFECTIVENESS

We are committed to continuously improving our approach to modern slavery. To ensure our efforts remain meaningful, we track progress against key commitments and goals using an internal evaluation framework.

We continue to review and assess the effectiveness of our policies, processes and procedures in line with emerging best practices. As our modern slavery approach evolves, we are refining the ways we evaluate the impacts of our actions and proactively planning for future improvements.

Measure	Indicator	Actions taken in 2025	Next steps
Due diligence	<ul style="list-style-type: none"> <li>Percentage of suppliers identified as high risk that have sustainability contracts in place and/or that we have engaged.</li> </ul>	<ul style="list-style-type: none"> <li>Revised our approach to category-risk management with the aim of better understanding—across multiple tiers of the supply chain—the risks associated with each supplier, including inherent risk, residual risk and risk events.</li> <li>Tracked progress against our modern slavery priorities through structured governance and data-driven monitoring to ensure accountability and continuous improvement.</li> <li>Assessed our entire global supply chain using a risk management service capable of analysing up to 10 tiers in depth. This process will be conducted twice each year going forward. The risk management service evaluates suppliers across a range of risks, generating region-specific lists of highest-risk suppliers that inform targeted engagement and remediation efforts.</li> <li>Embedded policy to update modern slavery clauses in all new supplier contracts to strengthen contractual safeguards and collaborate across functions to support implementation and awareness throughout the business.</li> </ul>	<ul style="list-style-type: none"> <li>Review and support regional working groups to strengthen third-party labour management.</li> <li>Enhance education and controls across the global organisation.</li> <li>Engage stakeholders and prepare for a third-party audit.</li> </ul>
Grievance mechanism monitoring	<ul style="list-style-type: none"> <li>Number of Speak Up reports received per 100 employees.</li> <li>Types of reports by category.</li> <li>Proportion of reports substantiated.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing tracking of emerging themes and issues related to modern slavery—conducted by our Business Conduct team, which manages our global approach to monitoring whistleblower reports.</li> <li>The reports received in 2025 related primarily to bullying, harassment, conflicts of interest and other general misconduct.</li> <li>No reports of modern slavery were received in 2025.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to promote awareness of the Speak Up facility and whistleblower protections across our global operations and supply chain.</li> </ul>
Modern slavery training—employees and suppliers	<ul style="list-style-type: none"> <li>Number and percentage of employees that complete training.</li> <li>Feedback from staff and suppliers about training.</li> </ul>	<ul style="list-style-type: none"> <li>Delivered a multilingual modern slavery training program to our employees to raise awareness of modern slavery, risk indicators, our processes for addressing modern slavery risks and the impacts on key employees across our business. Completion rates were tracked.</li> <li>Implemented a tailored supplier training program and tracked completion rates. This year supplier training was delivered on a targeted basis across select high-risk regions.</li> </ul>	<ul style="list-style-type: none"> <li>Leverage membership with the United Nations Global Compact to facilitate training opportunities for key employees.</li> <li>Broaden the reach of our supplier training program, further implementing it across our supplier network—particularly in regions of high-risk.</li> </ul>
Business activities, including internal auditing	<ul style="list-style-type: none"> <li>Number of modern slavery working group meetings.</li> <li>Number of audit outcomes—related to human rights and modern slavery—acted upon.</li> </ul>	<ul style="list-style-type: none"> <li>Assessed effectiveness of the modern slavery actions undertaken by various teams across the business.</li> <li>Evaluated internal business controls and processes, including our alignment with Orica procurement standards across regional procurement functions—undertaken by our internal audit function.</li> <li>All audit actions from the prior year were actioned.</li> <li>Updated Human Rights at Work Policy.</li> </ul>	<ul style="list-style-type: none"> <li>Continue to review our approach to human rights and work towards updating appropriate governance mechanisms.</li> <li>Support the findings of the global policy review.</li> </ul>

# CONSULTATION PROCESS

Orica operates and is managed as a group of affiliated entities with overarching policies, standards, systems and processes that are designed to be applied consistently across our controlled entities.

Our emphasis on partnership and open communication ensures that our actions to address modern slavery risks are informed by a broad range of expertise and experience across the Orica business, reinforcing our commitment to continuous improvement and collective responsibility.

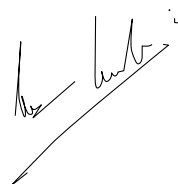
In accordance with our operating model, we undertook a range of consultations to inform this Statement, including:

- Cross-functional engagement with our modern slavery working group, comprising representatives from our Ethics and Compliance, Global Supply Chain, Legal, Risk and Compliance, Finance, Human Resources and Sustainability teams.
- Entity-level alignment with each reporting entity, confirming the consistency of due diligence processes across the business. This includes entities operating as part of the Orica Group and supported by functional teams such as the Global Supply Chain team.
- Regional input, including contributions from regional supply chain teams.
- Targeted stakeholder engagement with key internal stakeholders to address findings from the 2024 risk assessment.

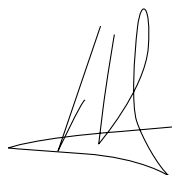
Prior to submission for review and approval to the Boards below, this Statement was reviewed by selected members of the modern slavery working group: General Counsel – Corporate; Chief Communications Officer; Head of Sustainability and President – SHES and Discrete Manufacturing and Supply.

This Statement has been approved by the Boards of:

- Orica Limited on behalf of the reporting entities other than Orica Mining Services Pilbara Pty Ltd on 13 November 2025, and
- Orica Mining Services Pilbara Pty Ltd on 13 November 2025.



**Sanjeev Gandhi**  
Managing Director and Chief Executive Officer  
Orica Limited



**Germán Morales**  
Chair  
Orica Mining Services Pilbara Pty Ltd

# APPENDIX I—REPORTING ENTITIES

## Relevant reporting entities

This is a joint Statement comprising the following reporting entities under the Australian *Modern Slavery Act 2018* (Reporting entities), referred to as 'we', 'us', 'our' or 'Orica'.

Reporting entity	Activities of reporting entity	Location of reporting entity
Orica Limited (ACN 004 145 868), the ultimate holding company in the Orica Group	Provides strategic support to the Orica Group	Australia
Orica Australia Pty Ltd (ACN 004 117 828)	Manufactures and supplies commercial explosives and blasting systems	Australia
Orica Investments Pty Ltd (ACN 009 781 257)	Provides strategic support to the Orica Group	Australia
Orica Mining Services Pilbara Pty Ltd (ACN 158 151 369)	Manufactures and supplies explosives and blasting systems to the mining and resources sectors	Australia
Cyanco Canada Inc (BN 855576286RC0001)	Manufactures and supplies sodium cyanide and related products to the mining industry, primarily for gold extraction processes	Canada
Orica Canada Inc (BN 867220899RC0005)	Manufactures and supplies explosives and other chemical products for the mining, quarrying and construction industries	Canada
R.S.T. Instruments Ltd (BN 104660691RC0002)	Designs, manufactures and supplies geotechnical and structural monitoring instruments for civil engineering, mining and infrastructure projects	Canada
RST TopCo Holdings, Inc (BN 791844718RC0001)	Holding company	Canada
Terra Insights Ltd (BN 791844718RC0002)	Provides geotechnical, structural and environmental monitoring solutions, including sensors, data management and analytics tools for infrastructure and mining projects	Canada
Orica Norway AS (Org. No. 981 413 156)	Manufactures and supplies explosives and other chemical products for the mining, quarrying and construction industries	Norway
Orica UK Limited (Co. No. 03499102)	Manufactures and supplies explosives and other chemical products for the mining, quarrying and construction industries	UK

A full list of controlled entities within the Orica Group is included in note 16 in the 2025 Annual Report. Orica Investments Pty Ltd is the holding company of many of our controlled entities (including overseas controlled entities) while Orica Limited is the immediate parent.

This Statement covers assets wholly owned and/or operated by Orica and those assets owned by joint ventures that are operated by Orica during the period 1 October 2024 to 30 September 2025. While we also hold interests in assets owned by joint ventures that are not operated by Orica, this Statement applies only to our operated assets unless stated otherwise.

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

## APPENDIX II—DISCLOSURES MATRIX

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	Canadian Act mandatory reporting requirements	Norwegian Act mandatory reporting requirements	Location in this Statement
Identify the reporting entity and describe its structure, operations, and supply chains.	Organisation's structure, its business and its supply chains.	The company's structure, activities and supply chains.	A general description of the enterprise's structure and area of operations.	From page 6
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of its business and supply chains where there is a risk of slavery and human trafficking taking place and the steps it has taken to assess and manage that risk.	The parts of the company's business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk.	Guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.	From page 12
Describe the actions taken by the reporting entity, and any entities the reporting entity owns or controls, to assess and address these risks, including due diligence and remediation processes.	Organisation's policies in relation to slavery and human trafficking, and due diligence processes in relation to slavery and human trafficking in its business and supply chains.	<p>The company's policies and its due diligence processes in relation to forced labour and child labour.</p> <p>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.</p> <p>Any measures taken to remediate any forced labour or child labour.</p>	Information regarding actual adverse impacts and significant risks of adverse impacts that the enterprise has identified through its due diligence.	From page 13
Describe how the reporting entity assesses the effectiveness of these actions being taken to assess and address modern slavery risks.	Organisation's effectiveness in ensuring that slavery and human trafficking are not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains.	Information regarding measures the enterprise has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.	Page 18
Describe the process of consultation with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity giving the statement).				Page 19
	Training and capacity building on slavery and human trafficking available to its staff.	Training provided to employees on forced labour and child labour.		Page 14
Additional relevant information.				Throughout this Statement

