

# MODERN SLAVERY STATEMENT 2020



**Incitec Pivot Limited**

**DYNO**  
Dyno Nobel



INNOVATION ON THE GROUND



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## REPORTING ENTITIES

This statement is made by Incitec Pivot Limited (ACN 004 080 264) and its wholly-owned subsidiaries Dyno Nobel Asia Pacific Pty Ltd (ACN 003 269 010), Dyno Nobel Moranbah Pty Ltd (ACN 115 650 649), Incitec Fertilizers Pty Ltd (ACN 103 709 155), Southern Cross Fertilisers Pty Ltd (ACN 004 936 850), Incitec Pivot Explosives Holdings Pty Limited (ACN 124 351 328), Incitec Pivot Investments 1 Pty Ltd (ACN 130 242 090), Incitec Pivot Investments 2 Pty Ltd (ACN 130 242 045) and Dyno Nobel Pty Limited (ACN 117 733 463) (together with other controlled entities of Incitec Pivot Limited, IPL) in respect of the reporting period ended 30 September 2020.

In this, our first Modern Slavery Statement, IPL sets out how it is identifying and addressing modern slavery risks across its supply chain and operations.

This statement is made pursuant to the *Modern Slavery Act 2018* and has been approved by IPL's Board of Directors.

## OUR APPROACH

Across all parts of the business, IPL takes its human rights obligations and responsibilities seriously and is committed to operating consistently with the United Nations Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights.

IPL's aim is to ensure the importance it places on upholding human rights is replicated across its business partners and suppliers, throughout the value chain.

## OUR BUSINESS

Incitec Pivot Limited is an Australian public company, listed on the Australian Securities Exchange. Each other reporting entity listed in the Reporting Entities section above is an Australian private company and a wholly-owned subsidiary of Incitec Pivot Limited.

As a recognised world leader in the resources and agricultural sectors, IPL's products and services play a critical role in supporting the world's energy, infrastructure, and raw materials needs, together with feeding people across the globe by driving agricultural performance and sustainability.

With its 150-year history of advancing technological developments, IPL's Dyno Nobel business is a leading manufacturer of industrial explosives and supplier of premium blasting technologies.

IPL's Dyno Nobel business operates in the Americas, Australia, Turkey and Asia Pacific. Its explosives services and products are critical for the customers in the resources and civil construction sectors.


IPL also has equity interests in a number of joint ventures, including a 50% interest in a manufacturer of ammonium nitrate in Australia, Queensland Nitrates Pty Ltd (ABN 63 079 889 268), and manufacturers of initiating systems, Sasol Dyno Nobel (Pty) Ltd and DetNet South Africa (Pty) Ltd (DetNet), both in South Africa.

IPL's Australian-based Fertilisers business is the largest manufacturer and distributor of fertiliser in Australia and has been supplying farmers with high quality products and services for more than 100 years.

Its products and services are critical for farmers to grow high-quality crops that feed Australians and people across the globe.

IPL also manufactures industrial chemicals used by its customers for food production, transportation, medical products transfer and water treatment.

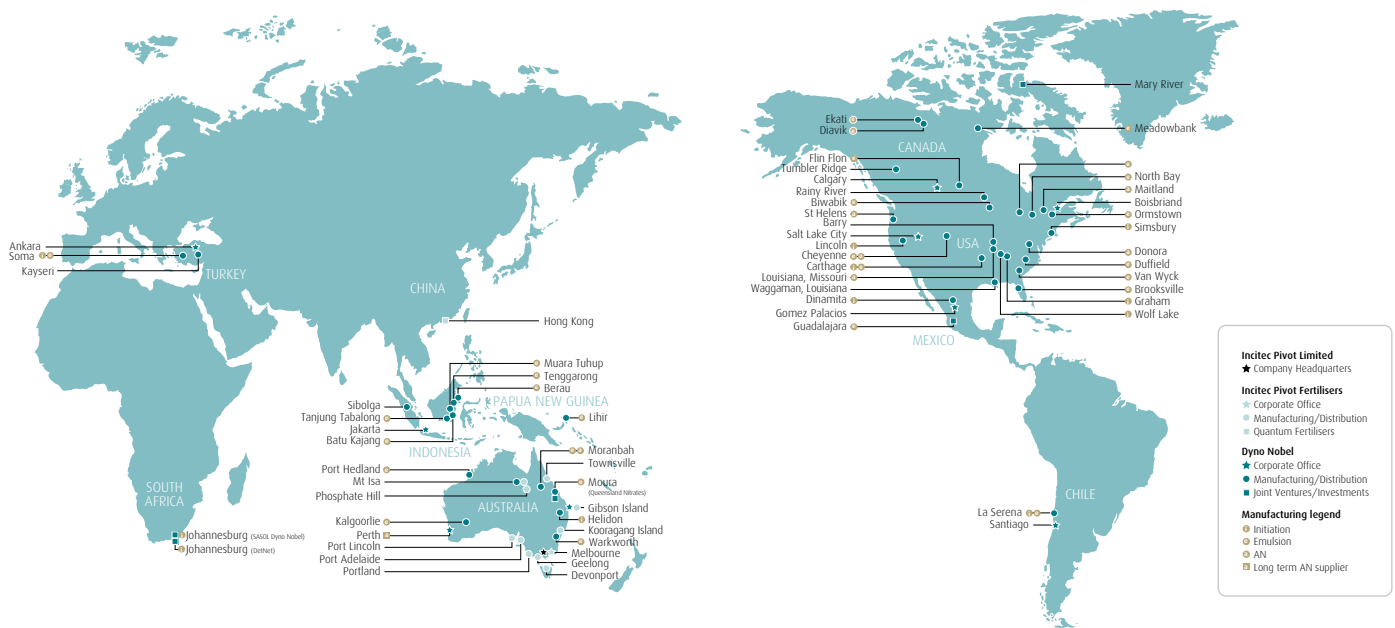
With advanced technologies, manufacturing excellence and world class services, IPL is focused on developing the efficiency and sustainability of its customers and users across the resource and agricultural sectors.



IPL aims to make people's lives better by unlocking the world's natural resources through **innovation on the ground.**



## OUR OPERATIONS



## AT A GLANCE



7,300  
Suppliers



5,000  
Employees



60  
Manufacturing facilities



3.1 billion AUD  
Spend with suppliers for the  
2020 financial year



3,942.2 million  
Revenue for the  
2020 financial year



374.5 million  
EBIT (ex IMIs) for the  
2020 financial year



## Dyno Nobel

Dyno Nobel is IPL's global explosives business. It is the second largest industrial explosives distributor in North America and the second largest industrial explosives distributor in Australia by volume.

**Americas:** Dyno Nobel Americas (DNA) provides ammonium nitrate, initiating systems and services to the Quarry & Construction sector primarily in the Southern US, Northeast US and Canada; the Base & Precious Metals sector in the US mid-West, US West and Canada and the Coal sector in the Powder River Basin, Illinois Basin and Appalachia.

Incitec Pivot Investments 1 Pty Ltd, Incitec Pivot Investments 2 Pty Ltd and Dyno Nobel Pty Limited are Australian proprietary companies that are holding entities of the DNA business within the IPL corporate group. They do not conduct any operations.

**Asia Pacific:** Dyno Nobel Asia Pacific Pty Ltd (DNAP), provides ammonium nitrate based industrial explosives, initiating systems and services to the Metallurgical Coal and Base & Precious Metals sectors in Australia, and internationally to a number of countries including Indonesia, Papua New Guinea and Turkey through its subsidiaries and joint ventures. Dyno Nobel Moranbah Pty Ltd manufactures ammonium nitrate at its ammonium nitrate plant located in the Bowen Basin, Queensland.

Incitec Pivot Explosives Holdings Pty Limited is the holding entity of IPL's global explosives business. This entity does not conduct any operations.

## Incitec Pivot Fertilisers

Incitec Pivot Fertilisers (IPF) is IPL's fertilisers business. With an unrivalled position across Eastern Australia, it is the largest domestic manufacturer and supplier of fertilisers by volume produced from its strategically positioned manufacturing facilities, including the ammonium phosphate fertiliser plant in Phosphate Hill, complemented by the world scale sulphuric acid plant at Mount Isa, in North Queensland. Southern Cross Fertilisers Pty Ltd owns and operates IPL's ammonium phosphate fertiliser plant in Phosphate Hill.

Incitec Fertilizers Pty Limited operates IPL's manufacturing facilities in Gibson Island, Queensland, where it manufactures ammonia, granulated ammonium sulphate and urea, and in Geelong, Victoria, where it manufactures single super phosphate.

Internationally, the fertilisers business sells to major offshore agricultural markets in Asia Pacific, the Indian subcontinent, Brazil and the United States. It also procures fertilisers from overseas manufacturers to meet domestic seasonal peaks for its customers' diversified crops.

## Global Manufacturing

**Americas:** In North America, Dyno Nobel manufactures ammonium nitrate at its Cheyenne, Wyoming and Louisiana, Missouri plants. The Cheyenne, Wyoming plant is adjacent to the Powder River Basin, strategically placed for both the Base & Precious Metals sector and North America's most competitive thermal coal mining region. The Louisiana, Missouri plant has a competitive logistic footprint from which to support the Quarry & Construction sector and mining in both the Illinois Basin and Appalachia.

Initiating Systems are manufactured at Dyno Nobel's facilities in Connecticut, Kentucky, Illinois, Missouri, Chile and Mexico, and are also sourced from DetNet, an IPL electronics joint venture.

**Asia Pacific:** In Australia, Dyno Nobel manufactures ammonium nitrate at its Moranbah plant, which is located in the Bowen Basin, the world's premier metallurgical coal region. Queensland Nitrates Pty Ltd, a joint venture of Dyno Nobel, operates its fully integrated, state of the art joint venture ammonium nitrate facility near Moura in Central Queensland. Initiating Systems are manufactured at Dyno Nobel's Helidon facility in Queensland and are also sourced from IPL facilities in the Americas and its joint ventures.

The business also produces nitrogen-based fertilisers and industrial chemicals across four locations including its state of the art ammonia plant in Waggaman Louisiana, that are delivered to its fertiliser end markets via an integrated supply chain.

## Workforce

IPL seeks to engage a workforce that is representative of its markets and communities across the global organisation, utilising a diverse range of people with broad and varied skill sets. Operating across five continents, a diverse and inclusive business with the right people in the right roles provides an engaging workplace and enables achievement of our business objectives.

Our inclusion in the global Bloomberg Gender Equality Index (GEI) for the third consecutive year demonstrates publicly our commitment to diversity and inclusion in the workplace. We continue to progress towards specific, challenging and measurable objectives for gender diversity and Indigenous Australians.

IPL's workforce is comprised of approximately 5,000 direct employees in full time and part time roles and 648 labour hire contractors. The roles filled by these employees and contractors are as diverse as our workforce, from labourers to engineers.

Breakdown of Labour Hire Contractor Workforce as at 30 September 2020 by Location:

Location	Number of Contractors
Australia	449
USA & Canada	102
Chile	3
Mexico	11
Indonesia	83
Turkey	All work is carried out by direct employees

Labour hire is a key component of the workforce in Australia. It is used to supplement seasonal, maintenance and productivity demands and fluctuates to meet business requirements. There is minimal use of labour hire contractors in IPL's operations outside of Australia and North America.



## Our Supply Chain

IPL procures raw materials that are used directly in the manufacturing process for explosives, fertilisers and industrial chemicals and indirect materials and services that support the activities of the organisation.

IPL's largest categories of spend are: fertilisers, transport and site services which comprise 53% of the spend within the Asia Pacific business units and 32% on corporate and utilities within the Americas business unit.

In FY20, approximately 70% of IPL's total procurement spend was with Australian domiciled entities, supplying goods and services originating from Australia and around the world. The majority of spend in non-Australian entities was on fertiliser imports.

Our Asia Pacific and North American Procurement teams manage a Supplier Relationship Management (SRM) program to develop and continuously improve relationships with strategic suppliers. This is designed to promote stable, longer term, commercial relationships.

In FY20, IPL engaged directly with approximately 7,300 suppliers domiciled across 45 countries across the globe.

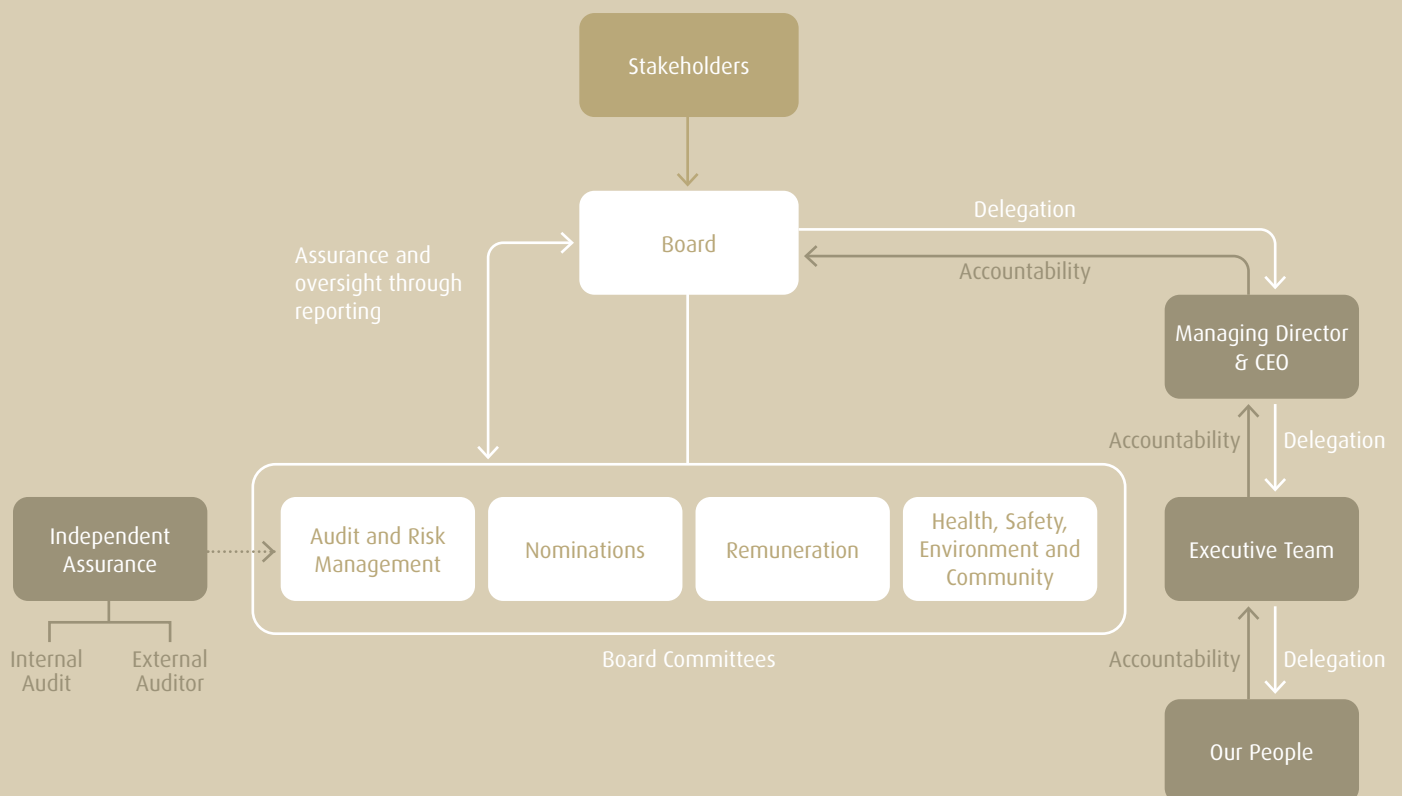
As part of the supplier risk assessment and tiering process, in FY20, IPL identified 40 (0.6%) potentially high-risk suppliers based on the potential risk of modern slavery indicators in the supply chain. This risk-based approach referenced data from the Global Slavery Index using the domiciled region, commodity and spend data to assist with determination of the risk. These were immediately prioritised in the screening process to ensure that appropriate compliance and ongoing safeguards were implemented. This process is discussed in further detail in the Assessing and Identifying the Risks of Modern Slavery section.

Each of our suppliers also have their own supply chains, over which we presently have limited visibility. Understanding IPL's broader supply chain is a complex process, and we intend to further build our understanding of risks among our supplier network through engagement with suppliers and contractors over future periods. During FY20, the COVID-19 pandemic resulted in impacts in IPL's usual supply practices, however IPL reacted quickly to mitigate these impacts and associated risks of modern slavery.

Further information about IPL's approach to suppliers and identifying modern slavery risk is set out below.

## OUR GOVERNANCE FRAMEWORK

IPL's Board is committed to achieving and demonstrating the highest standards of corporate governance and fulfilling its obligations in the best interests of its shareholders, its employees, and the broader community. The Board has implemented, and operates in accordance with, a set of corporate governance principles which are fundamental to the Company's continued growth and success.





## Our Policies

Our policies and frameworks support IPL's day-to-day activities and are designed to ensure universally recognised human rights are safeguarded.

Our Group-wide Modern Slavery Policy sets the minimum standards expected across the business, both internally and from our suppliers and customers, in identifying and addressing the risk of modern slavery within our operations and supply chains.

Our Human Rights Policy articulates the fundamental elements of our approach to human rights. It sets out IPL's commitment to respect human rights, in line with the Universal Declaration of Human Rights and other international frameworks. It defines our commitments to respect and support the dignity, well-being and human rights of our employees and those in the communities in which we operate, which includes ensuring a fair, safe and healthy working environment.



## Supplier Code of Conduct

Our Supplier Code of Conduct sets out the values, principles and minimum standards of behaviour that we expect our suppliers to meet across the areas of safety, labour, human rights, diversity, environment, community and ethics.

The principles outlined in the Supplier Code of Conduct have been embedded as part of our sourcing and procurement processes, and IPL engages with suppliers and contractors that demonstrate similar values and adhere to the minimum requirements outlined in the Supplier Code of Conduct.

## Supply Contracts

Our standard supply contracts were updated in 2019 to incorporate modern slavery provisions designed to identify modern slavery risks within the supplier's operations and supply chains. These provisions provide assurances to IPL as well as requiring suppliers to provide information and assistance to IPL to identify, evaluate, implement and report on any modern slavery risks within the supplier's business and supply chains. IPL regularly reviews its supply contracts and updates as necessary to ensure compliance with applicable laws and regulations, in addition to supporting IPL's broader policy objectives.

## Our Values

Our Company values are at the core of the way we work. With a One IPL – One Team mindset and behaviours, coupled with cross functional and geographical collaboration across our businesses, we are able to capture diversity of thought in an inclusive environment where the contribution of everyone is valued.



*Think Customer.  
Everyone. Every day.*



*Treat the  
Business  
as our Own*



*Challenge &  
Improve the  
Status Quo*



*Care for the  
Community &  
our Environment*



*Value People  
– Respect,  
Recognise  
& Reward*



*Deliver on  
our Promises*



## ASSESSING AND IDENTIFYING THE RISKS OF MODERN SLAVERY

IPL has developed a set of tools and procedures to identify and mitigate risks associated with human rights in its supply chain and operations. These tools and procedures have been developed by a team from across the global business, with representatives from key areas including Procurement, Sustainability, Supply Chain, Human Resources, IT, Legal and Risk.

The Procurement and Supply Chain teams have responsibility for identifying and assessing risks in the supply chain. These activities are supported by external tools referenced below and internal risk, control and audit registers contained in IPL's risk and controls system.

IPL has a multi-year, systematic approach to integrating ethical supply chain transparency and due diligence throughout its supply chain. This risk-based, phased approach prioritises higher risk jurisdictions, commodities and services.

Through implementation of these tools and procedures, IPL is able to deepen its understanding and assessment of suppliers and continuously implement improvements.

IPL has operations in various locations around the globe, with a diverse workforce. IPL's human resources procedures across its operations contain a number of controls to ensure risks of human rights abuses, including child labour and forced labour, are managed, having regard to the jurisdiction specific requirements and risks. These controls include proof of age and the requirement to provide security clearances in certain jurisdictions. For example, in Indonesia, the minimum age for recruitment of employees and labour hire contractors is 20 years old, with minimum education requirements set as senior high school for all direct employment positions, supported by copies of the candidate's ID and education certificate registered on the human resources records system. For third party contractor labour, minimum age and education requirements are stipulated with third party providers. In Turkey, in accordance with the local labour law, IPL's human resources team view and retain a copy of employees' Turkish I.D. during the recruitment process. All of our employees are engaged through contracts of employment agreed by the company and the employee.

The IPL HR Data Collection Procedure requires all security guards hired by IPL to provide their qualification certificate prior to commencing work. This certificate is required to show evidence of training in accordance with the UN Voluntary Principles on Security and Human Rights.

### Due Diligence

To conduct an initial assessment of the risk of modern slavery in its supply chains, IPL used a risk-based, phased approach, prioritising higher risk jurisdictions, commodities and services. The risk-based approach referenced data from the Global Slavery Index using the domiciled region, commodity and spend data to assist with determination of the risk. Based on that initial assessment, IPL identified 40 (0.6%) potentially high-risk suppliers, who were immediately prioritised for further due diligence assessment.

As the next step, each of IPL's existing and new suppliers is assessed by a targeted modern slavery questionnaire, which is issued through the ethiXbase platform, developed in conjunction with Norton Rose Fullbright that covers screening processes, relationships, compliance mechanisms and workforce training. To date, over 2,700 questionnaires have been issued to our suppliers, with the remaining suppliers to receive questionnaires in FY21. Once responses are received from the suppliers, they are risk reviewed, and potential and/or actual risks identified. Our Procurement teams prioritise the higher risk areas and work with suppliers on gap-closing action plans where appropriate.

IPL continues to evolve its use of third-party due diligence processes to further enable risk factor identification from public and private information sources to then determine and implement effective mitigation steps. Baseline tools used to support the efficacy of its processes include the Dow Jones Know Your Business portal, ethiXbase and the Transparency International Corruption Perception Index.

### Whistleblower System

IPL is committed to a culture of compliance, ethical behaviour and good corporate governance that encourages the reporting of improper, illegal and unethical behaviour.

Having a Whistleblower Protection Policy in place and accessible to all employees, in multiple formats and languages, empowers them to confidentially report unethical or illegal conduct and raise concerns regarding actual or suspected contraventions of ethical or legal standards, without fear of victimisation, reprisal or harassment.

In some countries where we operate, there are laws in place that impose specific obligations and protections in relation to whistleblowers. In Australia, IPL has adopted the Australian Whistleblower Protection Policy to supplement its Group policy.

IPL's Whistleblower Hotline (Navex Global) is an externally managed, worldwide service that is multi-lingual and confidential, and reporters may remain anonymous if they wish. Navex Global may be contacted at any time and take reports in all countries in which IPL operates and in all our major operating languages, being English, French, Spanish, Chinese, Turkish and Bahasa. Where a matter has been reported to Navex Global, a Whistleblower Protection Officer will review the report and determine how it should be handled.

To report a matter visit: IPL's Whistleblower Hotline

### Workforce Training

Employees and contractors in supplier facing roles are required to undertake modern slavery training via IPL's on-line learning and development system. The module focuses on raising individual awareness of modern slavery, what it means, how it manifests, identification of potential or actual risks, and how to take action if a risk is identified. To date, approximately 87% of personnel assigned this training have completed it.

This training will be expanded across IPL's global business to ensure it captures the broader workforce, including workforce in higher risk jurisdictions.

### Remediation Procedure

Our Remediation Procedure provides guidance on what to do when the risk (actual or perceived) of modern slavery becomes apparent. The Procedure defines the roles and responsibilities of those involved in the remediation process, including communication procedures, investigatory steps and actions that must be followed if an incidence of modern slavery is identified and/or substantiated.

The Procedure also sets out when a Remediation Action Plan (RAP) is required to be developed and requires the RAP to be tailored to the individual circumstance.





## IPL'S MODERN SLAVERY RISKS AND ACTIONS TO RESPOND

As we continue to implement and embed our compliance tools, IPL will report any modern slavery risk areas within its operations and supply chains as they are identified annually.

In accordance with our risk-based, tiered approach IPL is prioritising and working with higher risk suppliers to identify and evaluate risks, using third party data and processes where required.

IPL continues its focus on the well-known human rights risk areas of shipping, with further detail included below. Other areas of risk in IPL's supply chains include procurement of raw materials and finished goods from higher risk jurisdictions, procurement of technology hardware, Personal Protective Equipment (PPE) and clothing and labour hire.

IPL acknowledges that the economic and social impacts of the pandemic could lead to increased modern slavery risks in some parts of its operations and supply chains. IPL reacted quickly to mitigate these impacts through rigorous risk assessment and collaboration with suppliers. In the Asia Pacific region additional PPE such as face masks and sanitiser were sourced from four existing suppliers who were actively in use prior to the pandemic, for whom due diligence checks had been completed previously.

### IPL Chartered Vessels

IPL utilises various processes with the objective of chartering vessels from reputable vessel owners and operators with proven track records in marine operations and safety. These processes include maintaining appropriate terms and conditions in our shipping contracts and charter parties.

IPL's charter party agreements include a requirement that the minimum standards of crew wages and terms and conditions of employment - as set out by the International Transport Workers Federation (ITF) - are met, and modern slavery provisions are being included in all new charter party contracts and variations.

IPL acknowledges a potential for risk in connection with the period of time crews can remain on board a vessel. This risk has increased during the COVID-19 pandemic as ship owners have been forced to change crews and divert to unscheduled ports to maintain their crew changes. To manage this risk, the agreements that IPL has with ship owners conform with the Australian Maritime Safety Authority (AMSA) Regulations which dictate the maximum periods crew members can stay on board. IPL reviews crew lists for each vessel it charters on an individual crew member basis, whether owned by the counterparty or other owner, to verify compliance with AMSA's standards, rejecting vessels that do not comply with AMSA's regulations.

Additionally, IPL uses the vetting service RightShip for every vessel chartered to assist in managing maritime risk and to provide Greenhouse Gas Emissions Ratings (GHG Rating), amongst other measures.

IPL also uses PurpleTRAC to perform a Port State control (PSC) check on every vessel that is chartered, which further ensures safety requirements are met.

Modern slavery surveys have been issued to the majority of our sea freight counterparties and suppliers. We are currently reviewing their responses and any identified risks will be investigated by carrying out further due diligence investigations and meeting with suppliers to agree on action plans.

### Procurement of Raw Materials and Finished Goods

IPL's key raw materials and finished goods are purchased by our Supply Chain and Procurement teams who manage the end to end negotiations and delivery of these products sourced from around the globe. Key items sourced include but are not limited to urea, phosphate rock, sulphuric acid and ammonium nitrate.

IPL acknowledges the potential risk of modern slavery, based on the jurisdictions in which some of these materials originate or have been manufactured. As such, our processes incorporate a number of due diligence activities which inform us further on the perceived and actual risks.

In relation to the procurement of fertiliser for the Asia Pacific region, we have 14 suppliers who provide key raw materials and finished fertiliser products. These suppliers are selected and closely managed by subject matter experts within our Supply Chain team. The majority of companies from which we procure are large state owned entities which are subject to human rights regulations within their own jurisdictions.

IPL continues to evaluate supplier responses to the IPL Modern Slavery Questionnaire and will report the outcomes in future years.



## Technology Hardware

IPL purchases technology hardware from large, well known brands. Some of these branded products are manufactured by companies that are subject to UK, Australian or Californian human rights legislation, and are required to publish modern slavery statements in accordance with the relevant legislation.

However, IPL recognises the potential for risk of modern slavery in technology hardware supply chains as the majority of hardware manufacturing occurs in countries that do not have a good track record for respecting the rights of workers. IPL has 105 vendors in the Information Technology category. We have purchased hardware from 12 of these in FY20.

To understand our technology supply chain further, we are evaluating responses to the supplier questionnaire, with a view to conducting further investigation where the responses highlight a potential risk or where further information is required.

We will continue to review our supply chain for the procurement of IT equipment in line with our policies and procedures.

## Personal Protective Equipment (PPE) and Clothing

PPE incorporates clothing and equipment to protect each person on an IPL site. Clothing includes hi-visibility shirts, trousers and boots. PPE includes gloves, glasses, hard hats and ear protection.

IPL has four PPE suppliers based in Australia providing goods to the Asia Pacific region. There are seven suppliers based in the United States and providing goods to IPL's operations in North America and Mexico.

IPL's PPE and clothing suppliers are in the process of receiving and completing the supplier questionnaire. Those responses received to date have not identified any risks of modern slavery.

## Labour Hire

Our workforce consists of both directly hired employees and contractors. Labour hire contractors are a key component of IPL's workforce in Australia. There is limited use of labour hire contractors in IPL's operations outside of Australia and North America.

Labour hire in Australia is managed through a small panel of contracted suppliers. IPL maintains regular contact with these suppliers as part of the Supplier Relationship Management Program. Additionally, IPL is in the process of selecting and implementing a global Contractor Management System to enable improved onboarding and monitoring of contractors across the organisation.

## ASSESSING EFFECTIVENESS

IPL tracks, manages and reports progress on a range of indicators used to assess the effectiveness of our business programs. Our processes, including risk assessments, audits and grievance mechanisms, assist in identifying areas for improvement, which are documented using a centralised reporting system. These processes are being utilised to track, manage and report the progress of IPL's modern slavery compliance system. As we deepen our understanding of the modern slavery risks within IPL's supply chains, we will continue to develop tools to assess the effectiveness of our modern slavery identification and assessment processes and will report on this annually.

IPL has not experienced any adverse modern slavery allegations or circumstances impacting its supply chains or operations during FY20 and remains confident that its assessment and identification procedures are effective.

## CONSULTATION WITH CONTROLLED ENTITIES

IPL has centralised management and procurement practices, with the Procurement and Supply Chain teams having responsibility for identifying and assessing risks in IPL's global supply chain. This Modern Slavery Statement has been prepared with input from Procurement and Supply Chain teams across all jurisdictions in which we operate and in consultation with representatives from other key areas of our global business including Sustainability, Human Resources, Legal and Risk.

The Modern Slavery Statement has been provided to the Executive Team and the directors of each reporting entity for comment, prior to being put to the Board of Incitec Pivot Limited for review and approval.







## CONTINUOUS IMPROVEMENT APPROACH

Over the next year IPL will continue its focus on identifying and addressing modern slavery risks across its global business and supply chains.

Key areas of focus will include:

- » further refining of the supplier due diligence program including engaging with the suppliers in relation to their responses to the supplier questionnaire;
- » expanding and mandating modern slavery awareness training among our people; and
- » further improving the identification and mitigation of risks by increasing awareness among our supplier community and ensuring transparency and accountability with each supplier.

IPL will continue to track and publicly report its progress and publish a Modern Slavery Statement annually.

This statement has been approved by IPL's Board of Directors.

A handwritten signature in black ink, appearing to read 'Jeanne Johns'.

**Jeanne Johns**  
Managing Director & CEO, Incitec Pivot Limited

March 2021

