



ABOUT THIS STATEMENT

Reporting entity

Orica's Modern Slavery Statement (Statement) is for the financial year commencing 1 October 2022 and ending 30 September 2023 (FY2023). This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Australian Act) and the Modern Slavery Act 2015 (the UK Act) and has been approved by the Board of Orica Limited and the Board of Orica Mining Services Pilbara Pty Ltd.

Modern slavery describes situations where coercion, threats or deception are used to exploit individuals and undermine or deprive them of their freedom. Modern slavery includes exploitative practices such as human trafficking, forced labour, servitude, slavery, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.¹

Mandatory reporting requirements

As noted, this Statement is made pursuant to the Modern Slavery Act 2018 (Cth) (the Australian Act) and the Modern Slavery Act 2015 (the UK Act). The table below sets out where the mandatory reporting requirements under the Australian Act, and the recommended criterion under the UK Act, have been addressed.

Table 1: Reporting requirements and recommended criteria

Australian Act mandatory reporting requirements	UK Act recommended reporting criteria	This Statement
Identify the reporting entity and describe its structure, operations and supply chains.	Organisation's structure, its business, and its supply chains.	Pages 6–7
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 taken to assess and manage that risk.	Pages 8–12
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 business and supply chains.	Pages 13–17
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 is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Pages 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).		Pages 19
	Training and capacity building on slavery and human trafficking available to its staff.	Pages 16
Any other relevant information.		Throughout Statement

In FY2023, Orica published a standalone Statement in line with the [Norwegian Transparency Act](#). Orica also notes the European Union's (EU) proposed Corporate Sustainability Due Diligence Directive (CSDDD). This will require companies operating in the EU to implement more stringent due diligence including human rights and environmental impact from value chains. The CSDDD is aligned to the incoming Corporate Sustainability Reporting Directive (CSRD).

In FY2024, Orica will work to integrate our responses to international human rights and modern slavery legislation, including our UK and Australian-aligned Modern Slavery Statement, our Statement aligned to the Norwegian Transparency Act, and our Statement that will align to Canada's incoming Modern Slavery Act (Bill S-211).

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 landscape.

Orica has prepared this information based on current knowledge and 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, nor 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.

Speak up

Orica encourages everyone to speak up about things they think are wrong, against the law or breach Our [Code of Business Conduct](#) (Our Code). Our online Speak Up Service is available in multiple languages at orica.ethicspoint.com. For more information, please read our [Whistleblower Policy](#).

1. UNSW Australian Human Rights Institute, "What is modern slavery?" www.humanrights.unsw.edu.au/research/modern-slavery.

Annual reporting suite

We produce a suite of reports to meet the needs of a wide range of stakeholders.



FY2023 Annual Report

A holistic view of our activities, financial and non-financial performance and strategies.



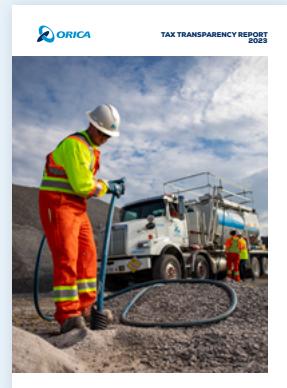
FY2023 Climate Action Report

Climate-related information aligned to the recommendations of the Task Force on Climate-related Financial Disclosures.



FY2023 Corporate Governance Statement

In accordance with the ASX Corporate Governance Council's Principles and Recommendations (4th Edition).



FY2023 Tax Transparency Report

Overview of our approach to tax, governance structure and tax position.

The following documents are available at orica.com/Investors: **Full Year Results Investor Presentation** and **Full Year Results ASX Announcement**.

An **Environmental, Social, and Governance (ESG) Data Centre** is available on our website and contains detailed data and reporting indices such as our Global Reporting Initiative (GRI) Index, Sustainability Accounting Standards Board (SASB) Index, Taskforce on Climate-related Financial Disclosures (TCFD) Index and Climate Action 100+ (CA100+) Net Zero Company Benchmark Index. Enquiries about this report or our annual reporting suite can be directed to companyinfo@orica.com.



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A MESSAGE FROM OUR MANAGING DIRECTOR AND CEO



Sanjeev Gandhi
Managing Director and Chief Executive Officer

Orica is dedicated to upholding human rights across our operations and supply chains. We seek to constantly improve our approach to managing human rights risks, including modern slavery. As a leader in our industry, we take responsibility for mitigating these risks and we are using our global influence to promote human rights throughout our entire value chain and the broader industry.

Orica is guided by international human rights standards, including the United Nations (UN) Bill of Human Rights and the International Labour Organisation's (ILO) fundamental conventions.

Orica continues to make progress against our modern slavery commitments. As a multinational organisation, Orica is exposed to a broad range of human rights and modern slavery risks through the geographies we work in and the sectors we engage with. Orica believes business should take action to respect human rights and prevent violations of human rights. We recognise this requires the systematic identification of human rights and modern slavery risks within our operations and across our value chain.

This year, Orica initiated an enterprise-wide modern slavery risk assessment, providing insights into risks in our supply chain and operational activity and allowing us to prioritise efforts in the highest risk areas. Orica also commenced a broader program of work in relation to human rights, starting with a high-level review of human rights risks across our business. This will guide additional targeted due diligence activity in FY2024.

Orica has continued our engagement with high-risk suppliers to address their risk management control gaps, trained employees on our Modern Slavery Risk Management Plan and continued to embed modern slavery risk management into our existing practices.

Orica recognises the importance of continuous improvement, the complexity of modern slavery and human rights risks. Orica is committed to continually improving and evolving our own approach and working alongside our customers, suppliers and stakeholders to mitigate human rights risks in FY2024 and beyond.

A handwritten signature in black ink, appearing to read "Sanjeev Gandhi".

Sanjeev Gandhi
Managing Director and
Chief Executive Officer



"Orica is committed to continually improving and evolving our own approach and working alongside our customers, suppliers and stakeholders to mitigate human rights risks in FY2024 and beyond."



TIMELINE

FY2021

- Conducted a comprehensive Modern Slavery Gap Analysis across operations and supply chain
- Developed Modern Slavery in Supply Chain Risk Management Plan and tools
- Trained key supply chain team members on modern slavery including how to identify and assess modern slavery risk

FY2022

- Modern slavery explicitly embedded into Orica's Code of Business Conduct
- Updated Orica's Whistleblower Policy to include reference to human rights abuses
- Integrated modern slavery into Orica's new Strategic Risk #7, Societal Expectations
- Conducted Human Rights Due Diligence workshop
- Invested \$100,000 in donations to Australian-based charities including Minderoo Foundations Walk Free program and Anti-Slavery Australia

FY2023

- Established Responsible Sourcing Statement
- Conducted an enterprise-wide risk assessment for modern slavery
- Commenced high-level review of broader human rights risk
- Delivered Modern Slavery training and competency program
- Performed Modern Slavery Assessment and Gap Analysis



FY2023 PERFORMANCE AND FUTURE PRIORITIES

	Progress in FY2023	Priorities moving forward
1. Strengthen our foundations		
<ul style="list-style-type: none"> › Focus on risk assessment and mitigation › Continue to improve our governance and due diligence › Review and align our practices and processes 	<p>Broadened an enterprise-wide risk assessment for modern slavery.</p> <p>Initiated a broader high-level scan to understand our human rights risks beyond modern slavery; updated our modern slavery risk accordingly.</p> <p>Refreshed the Human Rights at Work Policy. Performed a gap analysis of our approach to modern slavery governance to identify enhancements.</p> <p>Commenced risk review of current modern slavery controls and risk appetite.</p> <p>Completed Internal Audit on ESG governance.</p>	<p>Finalise enterprise-wide human rights risk high-level review and response.</p> <p>Review and further update our Human Rights at Work policy to reflect the findings of our high-level review.</p> <p>Undertake a comprehensive review on human rights and due diligence requirements in relevant operating regions.</p> <p>Implement findings of Internal Audit on ESG governance, specifically on roles and responsibilities and improving governance across the Human Rights portfolio.</p>
2. Build awareness and capability		
<ul style="list-style-type: none"> › Continue to embed awareness and lift capability across modern slavery and human rights 	<p>Delivered training on modern slavery and our risk management plan to relevant stakeholders in our supply chain teams.</p> <p>Conducted training/reflection workshops on human rights due diligence and remediation.</p>	Continue to build organisational capabilities through upskilling initiatives.
3. Collaboration		
<ul style="list-style-type: none"> › Work collaboratively with industry partners, customers, peers, government and others to leverage emerging best practice 	<p>Continued to work with customers and suppliers to identify modern slavery risk factors.</p> <p>Relevant working group members and stakeholders participated in externally facilitated workshops and webinars on modern slavery.</p> <p>Engaged human rights consultancy to review and strengthen our approach to identify and manage modern slavery risks.</p>	Identify priority areas to collaborate with other organisations to drive positive change based on the results of our risk assessment.
4. Supply chain risk management		
<ul style="list-style-type: none"> › Enhance our approach to due diligence and engagement with suppliers 	<p>Ongoing integration of the Self-Assessment Questionnaire (SAQ) to our operating system platform, scheduled to complete in FY2024 due to expanded project scope.</p> <p>Published Responsible Sourcing Statement.</p> <p>Ongoing engagement with high-risk suppliers.²</p> <p>Commenced/continued risk management actions for suppliers identified as high-risk.</p>	<p>Finalise integration of SAQ into operating system.</p> <p>The Responsible Sourcing Statement informs onboarding process for new contracted suppliers.</p> <p>Continue and enhance due diligence and risk management actions for high-risk suppliers and supply categories, building on risk assessment findings.</p>

2. High-risk suppliers are defined based on an internal high-risk geographies list developed separately to the recently conducted Modern Slavery Risk Assessment reported on in this Statement.

OUR STRUCTURE AND BUSINESS

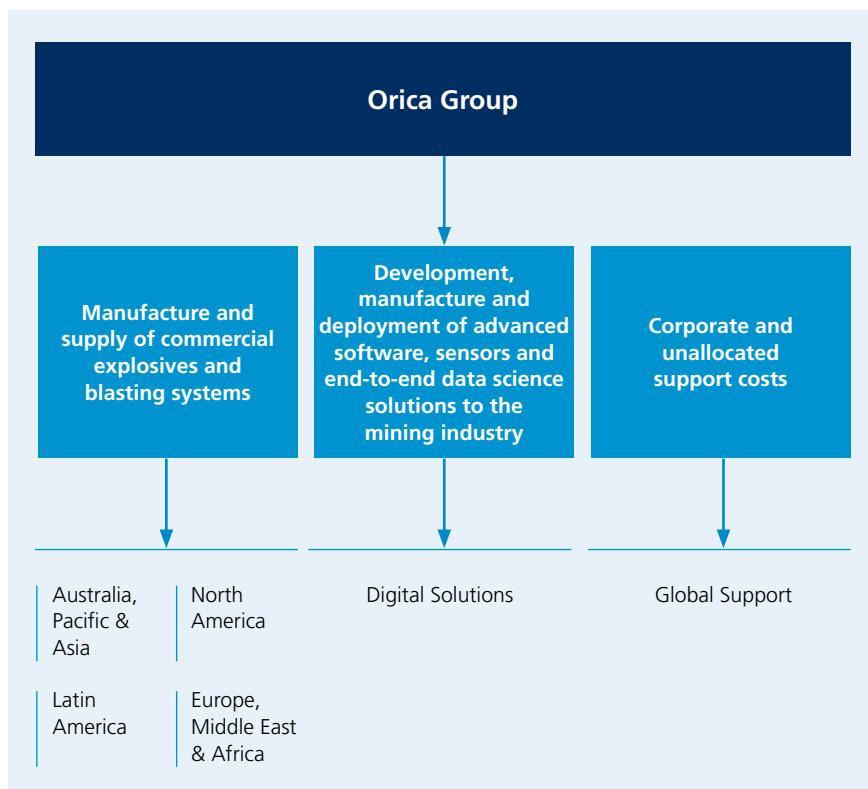
Our structure

Orica is one of the world's leading mining and infrastructure solutions providers. From the production and supply of explosives, blasting systems, mining chemicals and geotechnical monitoring to our cutting-edge digital solutions and comprehensive range of services, we sustainably mobilise the earth's resources.

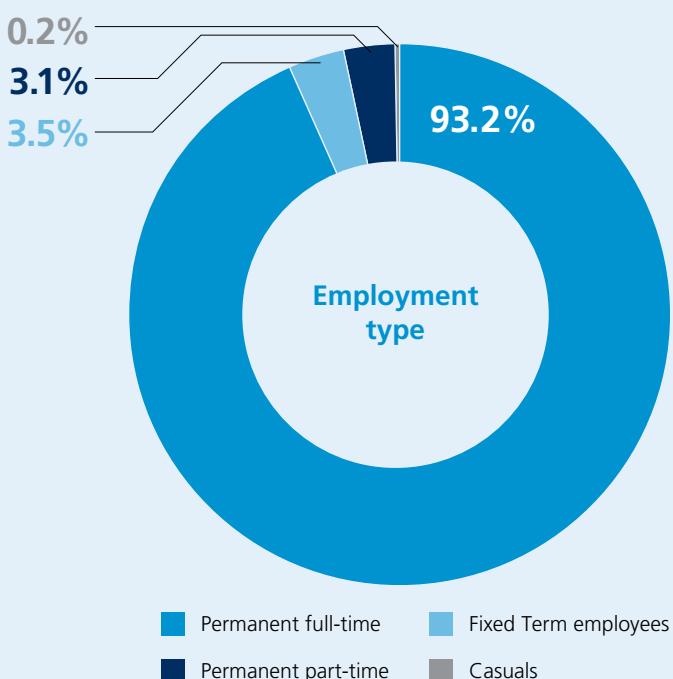
Our global network comprises continuous and discrete manufacturing operations, technical and monitoring centres and support offices. A network of joint ventures, ammonium nitrate emulsion (ANE) plants and bulk depots are strategically located to serve our customers around the world. Orica has over 12,500 employees and customers in more than 100 countries.

Orica Limited is the sole parent company of the Orica Group. It is headquartered in Melbourne, Australia and listed on the Australian Securities Exchange (ASX: ORI).

Our business is organised into segments based on the internal management structure as reported to the Group's Chief Operating Decision Maker (the Group's Managing Director and CEO).



Our people



20.2%
Female participation rate

34.8%
Females in Senior Leadership³

36.3%
Employees covered by agreements

3. The percentage of executive positions within Band D (Senior Manager) level and above (i.e., CEO 2 (Band D+)) held by women.

Our supply chain

Our operations are supported by a dynamic and complex global supply chain which includes procuring goods and services in the following categories.

Category	Description of goods and services
Continuous manufacturing	Bulk materials, primarily ammonium nitrate, ammonia, caustic soda and gas
Discrete manufacturing	Individual componentry used as raw materials for the production or assembly of blasting systems or procured as products to be used at mine sites
Corporate	Support products and services, including IT software and hardware, travel and consultants
Indirect	Products and services procured to support operations, including maintenance, repair and operations services
Logistics	Services and products supporting the movement of products

Our regions conduct their own purchasing. Each region sources products and services from local and international suppliers.

In FY2023, products and services were procured from 13,777 suppliers in 39 countries.

Orica works with suppliers who share our commitment to excellence, are aligned to our values, and are committed to acting ethically and improving their environmental and social impact.

By working collaboratively with our suppliers, Orica strives to meet sustainability challenges together and implement improvement plans where gaps or risks are identified.



IDENTIFYING RISK

We are guided by the Australian Modern Slavery Act's definition of risk. The Act defines modern slavery risk as the risk of people experiencing conditions of modern slavery and the risk of the business contributing to the harm of people.

Modern slavery risk assessment

In FY2023, we conducted a modern slavery risk assessment with a cross-functional team and the support of specialist external advisors across our operations and supply chain. This assessment built on previous work completed in FY2022. The results of the updated risk assessment are outlined in this Statement.

The risk assessment identified geographies, purchasing categories and suppliers where further modern slavery due diligence is required. We will continue to refine our modern slavery risk identification

methodology to identify and prioritise high-risk activities requiring further modern slavery due diligence, in addition to our standard due diligence approach.

In FY2024, we will complete a high-level review of Orica's human rights risks to refresh our understanding of our broader human rights risks and impacts and our human rights related policies and processes.

Risk assessment methodology

We use external data sources to build our understanding of modern slavery risk, including recent updates from the International Labour Organisation's (ILO)

Global Estimates of Modern Slavery,⁴ the International Trade Union Confederation's (ITUC) Global Rights Index (GRI)⁵ and Walk Free's Global Slavery Index (GSI) score, indicating the level of vulnerability to modern slavery.⁶

The risk assessment draws from these reputable data sources to quantitatively and qualitatively determine a level of risk based on the analysis of our operations and supplier spend. To develop a risk rating, the assessment draws on commodity and service risk, industry risk and geographic risk.

The risk assessment is also informed by our risk management approaches and internal stakeholder engagement.

Potential risks in our operations

Areas of operational activity with potential modern slavery risk are broadly identified in the table below.

Table 2: Modern slavery risk in operations by type

Activity	Modern slavery risk factors
Operations and/or offices in countries with heightened human rights risks	Risks associated with workforce and onsite contracted labour, including deceptive recruitment, underpayment of wages, health and safety concerns.
Manufacturing sites	High-risk geographies (inherent risk) Mining services: Peru, Indonesia, Mexico, Brazil, Ghana, Kazakhstan, Colombia, Philippines, Democratic Republic of Congo, India.
Non-operated joint ventures and equity investments in countries with increased human rights risks	Risks associated with workforce and onsite contracted labour, including lack of visibility around indirectly hired and temporary workers, health and safety concerns.
Equity investments in entities operating in countries with increased human rights risks	High-risk geographies (inherent risk) Manufacturing (continuous and discrete): Indonesia, Brazil, China, Colombia, India, Kazakhstan, Mexico, Peru.
Merger and acquisition (M&A) activity	Risks associated with entering geographies with high modern slavery risks.
Customers operating in countries with increased human rights risks	Risks associated with entering geographies with high modern slavery risks.
Contractors and subcontractors	Risks associated with complex layers of subcontracting and lack of transparency encouraging exploitative labour practices, including underpayment of wages, health and safety concerns. Risks related to workers in certain areas of service provision, such as cleaning, logistics and security.

Orica's updated FY2023 risk assessment considers our workforce in more depth. It has been assessed there is likely a lower risk of modern slavery in our direct workforce due to human resources policies and procedures. However, Orica acknowledges that contracted onsite services, such as subcontractors and third-party arrangements, may present a higher modern slavery risk. Orica also recognises that contingent and temporary workers may be at a higher risk of experiencing labour exploitation and conditions of modern slavery. Orica will continue to assess modern slavery risks in the workforce to mitigate risks and where an impact is identified, provide appropriate remedy.

4. International Labour Organisation, 2022 www.ilo.org/global/topics/forced-labour/publications/WCMS_854733/lang--en/index.htm

5. International Trade Union Confederation, 2023 www.globalrightsindex.org/en/2023

6. Walk Free Global Slavery Index, 2023 www.walkfree.org/global-slavery-index/

7. High-risk geographic countries have been defined through a risk assessment tool that overlays the external data sources noted in methodology with revenue.

Potential risks in our supply chain

Orica's supply chain spans the globe, meaning we are exposed to a variety of risks. Purchasing is also led at the regional level. Orica has conducted research to identify the risk areas that apply to our supply chain to prioritise supplier engagement.

Higher-risk suppliers were identified against country of incorporation and category of supply.

Further due diligence and engagement with higher-risk suppliers is prioritised based on spend.

Sub-contracted or third-party labour introduces complexity into Orica's supply chain and may have a higher risk of modern slavery. Orica's risk assessment model considers the use of sub-contracted labour and where it is known, we apply an additional risk matrix to inform the level of risk associated with that supplier.

Raw minerals and materials, including cobalt and Polyvinyl chloride (PVC), are considered high-risk in our FY2023 refreshed risk assessment.

Cobalt is used as a catalyst in the production of AN. Globally, a significant volume of cobalt is sourced from the Democratic Republic of Congo (DRC), which has a history of modern slavery including child labour.⁸ Research by Amnesty International has identified children as young as seven working in cobalt mines in the DRC.⁹

Orica is assessing the appropriateness of controls in place to mitigate these modern slavery risks. For example, a review is underway to assess the use of cobalt and suitability of replacements.

As we continue to conduct due diligence with our suppliers, investigating Tier 2 suppliers of these higher risk minerals and materials is a priority.

Orica recognises our highest risks are likely in the lowest tiers of our supply chain. To manage these risks, Orica continues to assess opportunities to meaningfully engage with our suppliers, business partners, customers and the communities in which we work.



8. NPR, 'How 'modern-day slavery' in the Congo powers the rechargeable battery economy' 2018 www.npr.org/sections/goatsandsoda/2023/02/01/1152893248/red-cobalt-congo-drc-mining-siddharth-kara
9. The Clean Energy Council, Addressing Modern Slavery in the Clean Energy Sector 2022 assets.cleanenergycouncil.org.au/documents/resources/reports/Addressing-Modern-Slavery-in-the-Clean-Energy-Sector.pdf

IDENTIFYING RISK

High spend countries

Countries where Orica has the highest procurement spend¹⁰ are displayed in the adjacent map. Key spend categories' GSI score, are noted for each country. The GSI uses data from the ILO and International Organisation for Migration (IOM). GSI's vulnerability metric measures the extent to which a population is vulnerable to modern slavery, while the model maps risk variables across five major dimensions: governance, lack of basic needs, inequality, disenfranchised groups and effects of conflict. The vulnerability score ranges from 1-100, with higher scores indicating a higher vulnerability to modern slavery.

This map represents an overlay of vulnerability to modern slavery in our supply chain with focus on our highest spend countries and their spend categories. Further detail on both operational and supply chain risk can be found in Table 2 (page 8) and Table 3 (page 12).



Legend

GSI vulnerability score



Orica locations

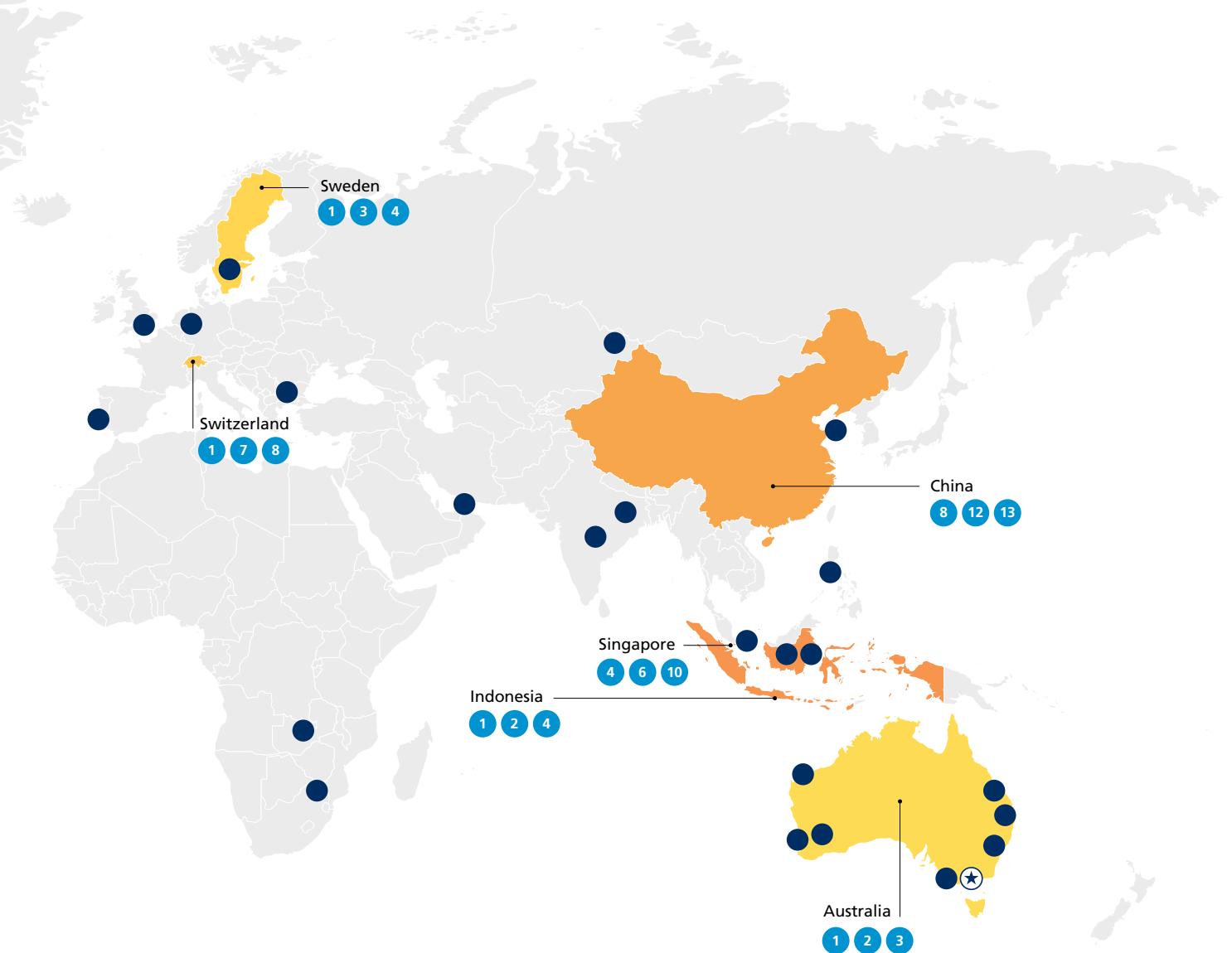
- Major operations
- ★ Head office

Spend categories

- | | |
|--------------------------|--|
| (1) Inorganic Oxides | (8) Industrial Manufacturing / Machinery |
| (2) Chemicals | (9) Explosive materials |
| (3) Road cargo transport | (10) IT consultant services |
| (4) Marine transport | (11) Emulsions |
| (5) Rail transport | (12) Mining / quarry equipment |
| (6) Additives | (13) Initiating system caps / detonators |
| (7) Resins | |



10. This spend list is based on our Modern Slavery Risk Assessment, which reviewed our FY2023 spend from September 2022 to June 2023.



[Learn more about Orica's operational footprint](#)

IDENTIFYING RISK

Table 3: Modern slavery risk by category¹¹ of supply

Category of supply	Modern slavery risk factors	Higher-risk countries ¹²
Bulk (raw including chemicals)	Inherent risks of forced labour based on mining and minerals industry and common sourcing countries including human trafficking and child labour.	<ul style="list-style-type: none"> ➤ Peru ➤ Indonesia ➤ Mexico
Polyvinyl chloride (PVC)	Inherent risks of forced labour based on manufacturing industry and common sourcing countries including limited labour rights available to workers, forced labour, servitude.	<ul style="list-style-type: none"> ➤ China ➤ India ➤ Brazil
Manufacturing components and assembly	Inherent risks of forced labour based on manufacturing industry and common manufacturing countries including limited labour rights available to workers, deceptive recruiting, debt bondage.	<ul style="list-style-type: none"> ➤ China ➤ Indonesia ➤ Mexico
Electronics	Inherent risks of forced labour based on manufacturing industry and common manufacturing countries including limited labour rights available to workers, deceptive recruiting, debt bondage. Prevalence of high-risk materials such as lithium and gold.	<ul style="list-style-type: none"> ➤ China ➤ Indonesia ➤ Kazakhstan
Personal protective equipment and safety gear	<ul style="list-style-type: none"> ➤ Inherent risks of forced labour based on manufacturing industry and common manufacturing countries including debt bondage, deceptive recruitment. Recent modern slavery accusations in Personal Protective Equipment (PPE) factories in Southeast Asia have been documented by institutions including the Australian Human Rights Commission.¹³ 	<ul style="list-style-type: none"> ➤ Malaysia ➤ Mexico ➤ Brazil
Transport and logistics services (including road and sea freight)	Inherent risks of forced labour based on transport and logistics industry, vulnerable workforce at risk of debt bondage, underpayment of wages, human trafficking.	<ul style="list-style-type: none"> ➤ All countries
Facilities maintenance services (including cleaning)	Inherent risks around workforce including migrant labour, deceptive recruiting, debt bondage.	<ul style="list-style-type: none"> ➤ All countries
Office supplies	Inherent risks of forced labour based on manufacturing industry and common manufacturing countries, and prevalence of high-risk materials such as timber, cotton and rubber.	<ul style="list-style-type: none"> ➤ All countries

11. Category risk based on external research reports including Verite Category Risk Atlas, US TVPRA List of Goods made using child or Forced Labour and US Trafficking in Persons Report.

12. A selection of our higher-risk countries. Geographic risk has been assessed based on external sources, including the Global Slavery Index and Global Rights Index. This table does not take into account proportion of spend across geographies.

13. Australian Human Rights Commission, 'Modern Slavery in the Health Services Sector', 2021, humanrights.gov.au/our-work/business-and-human-rights/publications/modern-slavery-health-services-sector

RISK MANAGEMENT AND REMEDIATION

Orica aims to respect and uphold the human rights of our people and those impacted by our operations and business relationships in the communities in which we operate.

Operations

Orica's operations are supported by robust systems and prudent practices. These are outlined in Our Code, policies and governance as found on our website, and in the Modern Slavery Governance section of this document.

Human rights in our workplace

Orica's labour risks in our direct operations are managed by our Human Resources function. Orica seeks to ensure workers are provided contracts and appropriate benefits commensurate with local markets. This is covered by our Human Rights at Work Policy, which outlines our human rights approach and commitment to appropriate pay and working hours, respect for employment laws and obligations (including no forced or child labour), and a workplace free from discrimination and harassment.

Safety

Safety is our number one priority. Orica has multiple programs that establish key safety controls and verification protocols, including our Major Hazard Management (MHM) program. Orica also empowers our people, including contractors, to call an immediate stop to work if they observe a potentially hazardous situation. Orica regularly communicates MHM stops and outcomes of investigations to encourage a culture of safety.

Orica closely monitors health, safety and environment concerns in all areas of our business. As the handling, manufacture and transport of explosives have the most significant hazard potential, comprehensive standards and best practices have been established to continuously reduce the risk of accidents. Transport equipment used in the company's operations is designed in accordance with the Orica Group's internal standards, national and international regulations for dangerous goods vehicles.

Our safety management systems and actions taken are reported in our FY2023 Annual Report.

Business Partner selection

Before engaging a Business Partner – defined as 'any person or entity which interacts with other parties on behalf of Orica or Orica-controlled entities' – due diligence activities are undertaken internally to identify critical operational, security, compliance and reputational risks.

This screening process is performed by Orica's Ethics and Compliance team. Any Business Partners identified as high-risk may be subject to enhanced due diligence, including detailed reviews of records on criminal, regulatory and civil actions, and adverse media searches to identify any potential human rights misconduct. Engaging a high-risk Business Partner requires approval from the Ethics and Compliance manager of the relevant region, who provides advice on any additional measures required to mitigate identified risks.

Appropriate clauses for managing modern slavery, anti-bribery and corruption, and trade sanctions compliance must be included in all Business Partner contracts. These include the right to audit Business Partner compliance and terminate a contract in the event of breach.

Acquisition due diligence

When engaging in an acquisition, Orica conducts ethics and compliance due diligence to understand and manage associated risks (e.g. Axis Mining Technology in FY2023).

Orica assesses:

- the geographies where rental and sales activities are conducted
- where equipment is manufactured
- where exclusive distributors are used.

New country entry

Many new growth opportunities are in countries with heightened operational, security, compliance and reputational risks. The primary tool for managing these risks is our country entry procedure. This procedure is applied prior to:

- entering into customer relationships in a country where Orica has not conducted sales in the prior two-year period; or
- establishing a presence in a country where Orica has not have a presence, including creating an entity, locating human resources (including contractors) or establishing a new facility.

As part of this procedure, a detailed risk assessment is undertaken. If the risk is assessed as medium or high in accordance with Orica's risk framework, an application must be made to an internal endorsement committee where the specific risks, including human rights risks, are considered, before final approval by the Chief Executive Officer.

Internal Audit

Orica's modern slavery program is supported by various business functions including our Internal Audit function. The role of Internal Audit is to provide an independent and objective assurance aligned to Orica's strategy and risk management framework. Internal Audit conducts annual audits on the oversight mechanisms and controls in place to manage sustainability risk and opportunities. In FY2023, Internal Audit assessed Orica's controls and governance mechanisms to achieve our Environmental, Social and Governance (ESG) commitments, including modern slavery. The findings identified opportunities for improvement in the implementation of our modern slavery controls, oversight and accountability. The findings of this report will be used to further enhance modern slavery governance.

Supply chain

Our supplier selection process includes qualification procedures on safety, sustainability, compliance and performance criteria.

A forced labour clause is also included in supplier contracts outlining our expectation that suppliers:

- have appropriate policies in place and conduct appropriate training relating to modern slavery
- will use all reasonable endeavours to prevent and respond to modern slavery
- have adequate procedures and mechanisms in place for reporting instances or suspected instances of modern slavery.

RISK MANAGEMENT AND REMEDIATION

Due diligence

Orica's supply chain teams are supported in conducting due diligence by our Modern Slavery Risk Management Plan. This plan includes practical guidance and supporting tools for identifying and managing modern slavery risk in the procurement process, and outlines how, when and the frequency of due diligence activities, depending on a supplier's risk rating.

Suppliers are assessed using our modern slavery self-assessment questionnaire (SAQ) and pre-qualification audits (which often include onsite visits) prior to contracting. These audits are performed by our team members with support from local staff. Orica also has strong pre-qualification assessment processes in place before we integrate materials and products into our processes. Where modern slavery concerns are identified, suppliers are required to undertake a corrective action plan.

The length and complexity of our SAQ was reduced in FY2022, a process that continued in FY2023.

The integration of our SAQ onto the Ariba platform is scheduled to be completed in FY2024.

High-risk country supplier management

SAQs assist in the assessment of residual risk¹⁴, once the supplier's existing risk controls are considered, and allow Orica to identify where further engagement is required with our suppliers.

Building on our work in FY2022, SAQs were sent to 55 suppliers in countries with an inherently higher risk of modern slavery, as identified by our internal Modern Slavery Risk Management Plan, including China, Democratic Republic of Congo, Papua New Guinea and Tanzania. Responses were received from 65 per cent of suppliers that were categorised from high to low, according to their modern slavery risk.

Orica also engaged a further 21 suppliers through our SAQ process, receiving a 62 per cent response rate.

Suppliers who did not provide any or adequate responses to the initial questionnaires in FY2022, were re-engaged in FY2023. Additionally, risk mitigation activities were undertaken with the suppliers who had been rated as high-risk based on their SAQ responses from FY2022, to resolve the 'red flags' and lower their residual risk ratings. Orica worked with supplier relationship owners to assess their controls and identify any areas of concern for further due diligence. Where possible, supplier relationship owners conducted site visits to understand available risk controls. All high-risk suppliers reviewed through this process had their risk ratings revised from high to moderate or low.

Orica will continue to address gaps identified by the SAQ responses as required in our Modern Slavery Risk Management Plan.



14. 'Inherent risk' is the risk present where no mitigation or controls are in place. 'Residual risk' is the risk that remains once efforts have been made to identify controls to manage risk.

Modern Slavery Governance

Orica's Board, through the Board Audit and Risk Committee (BARC) has oversight of material risks, including ethics and compliance risks which capture modern slavery. The Board review and approve our Modern Slavery Statement annually. Our modern slavery governance structure is outlined below.

Orica's Board

The Board has ultimate oversight of modern slavery risk and compliance with modern slavery legislation for the Orica Group.

Board Audit and Risk Committee (BARC)

The BARC assists with the effective discharge of the Board's responsibilities. This includes taking reasonable steps in its oversight of the effectiveness of processes and systems to manage the risk and ensure legal and regulatory compliance, and for detecting, reporting and preventing inappropriate business conduct.

Business Conduct Committee

The Business Conduct Committee assists the BARC by taking reasonable steps for the:

- effective implementation of policies (including our Code of Business Conduct), and standards and procedures on conduct, ethics and compliance
- effective performance of the systems that underpin secure and confidential use of the Whistleblower Policy
- appropriate investigation processes and responses to reported concerns

Our Whistleblower Protection Advisor:

- provides assistance to whistleblowers or people considering reporting
- provides advice to investigators on how to protect whistleblowers from detriment
- escalates matters to the Business Conduct Committee where appropriate

Our Business Conduct team:

- receives all reports made through the Speak Up service
- receives all reports raised internally by our people involving allegations of non-compliance with Our Code
- assigns responsibility for investigation, maintains oversight of investigations and any resulting actions, and provides ongoing reporting to the Business Conduct Committee

Modern Slavery Working Group

Our Modern Slavery Working Group has global, cross-functional representation and comprises senior leaders with accountability for their individual functions. The Working Group includes representatives from Corporate Affairs (Sustainability), Legal, Ethics and Compliance, Finance, Global Supply Chain, Human Resources, Risk and Assurance. Orica's President – SHES, Discrete Manufacturing and Supply is the Executive sponsor of the Modern Slavery Risk Working Group.

The Working Group met throughout the year, including for workshops reported on in our section on Collaboration. Our Working Group is involved in the review of the Modern Slavery Statement.

Policies and processes

In FY2023, Orica publicly released a Responsible Sourcing Statement. The statement is an expression of Our Code, outlining our expectations for suppliers (subcontractors, business partners and contractors) on ethical behaviour, human and labour rights including forced labour, community support and the management of environmental and social impacts.

In FY2024, the Responsible Sourcing Statement and other relevant policies, will be sent to new contracted suppliers as part of our standard new supplier process.

Group-level policies contribute to our governance of modern slavery.

Policy	Policy detail
Code of Business Conduct (Our Code)	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 do business 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 on 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 empowering people to stop unsafe work, compliance with all relevant SHES legislation and 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.

View our policies online at orica.com

RISK MANAGEMENT AND REMEDIATION

Risk Management System

Orica is committed to integrating modern slavery risk into the way we manage risk. Our risk management system is informed and shaped by our strategic objectives, our purpose and values and our risk appetite, and is embedded across all regions and functions. Orica's Risk Management system is highlighted in our FY2023 Annual Report.

In FY2022, Orica reported drafting a Human Rights Risk Appetite Statement, however with the rapid pace of modern slavery regulatory requirements, shifts to legislate due diligence practices, and growing modern slavery legislation coverage across our operating footprint, this Risk Appetite Statement has been delayed. Orica has zero appetite for legal non-compliance and will review, update and finalise this statement in FY2024.

An enterprise-wide risk assessment to inform a Risk Appetite Statement is underway, with a focus on modern slavery and a high level of human rights. Orica is also conducting a high-level business-wide human rights risk review to drive improvements in our broader risk approach to human rights. This high-level review will be completed in FY2024 and inform the update of applicable company policies and determine responsibilities and accountabilities.

Training

Modern slavery training is provided to our global supply chain roles to support their review of SAQ responses and help them identify risks and assign actions. The training raises internal awareness on the intricacies of modern slavery and explains the actions required of supply chain personnel to mitigate and manage modern slavery risk. The training steps through our Modern Slavery Risk Management Plan and the processes that must be followed in source-to-contract and onboarding into Orica's systems. All employees identified as having global supply chain roles completed modern slavery training in FY2023. In FY2024, Orica will continue to provide modern slavery training to relevant employees and raise awareness on modern slavery throughout our business.

All employees and relevant contractors are subject to the requirements of Our Code and must complete mandatory training on joining Orica. Mandatory periodic refresher training is also provided throughout employment.

Orica keeps key executives and Board members aware of shifts in approaches to modern slavery and broader respect for human rights, including regulatory and reporting requirements.

In FY2024, Orica will conduct a broader review of sustainability learning requirements, including modern slavery, to support an uplift in enterprise-wide sustainability knowledge.

Collaboration

Orica works collaboratively with industry partners, customers, peers, government and non-governmental organisations to improve our modern slavery risk management and performance and create positive impacts for victims of modern slavery.

Expertise and support

Orica's modern slavery approach is led by the Corporate Affairs (Sustainability) function and cross-functional Modern Slavery Working Group. Orica also collaborates with external advisors to improve our modern slavery approach.

In FY2023, Orica engaged an external human rights consultancy to identify and prioritise risk areas that may require enhanced due diligence. The consultancy conducted an updated operations and supply chain modern slavery risk assessment and performed a gap analysis of our processes to address modern slavery risk. They also reviewed our Modern Slavery Statement.

In FY2024, Orica will complete a high-level review of our human rights risk to strengthen our readiness for broader human rights due diligence with the support of our external partners. This will include refreshing our Human Rights at Work Policy.

Modern slavery workshops

In FY2023, Orica held workshops on modern slavery due diligence and remediation of modern slavery impacts with key stakeholders from across Orica. This was supported by an external consultant. The workshops helped raise internal awareness of modern slavery and how to address risks and incidents, and highlighted modern slavery risks relevant to Orica's business context.

The due diligence workshop facilitated discussion around how Orica might manage different modern slavery scenarios during our normal business activities including new country entry and cultural heritage. Our internal stakeholders discussed the potential risks of each scenario, existing controls in place to identify and manage risks and if there were any gaps, and the key next steps.

The remediation workshop used the continuum of involvement outlined in the UN Guiding Principles on Business and Human Rights¹⁵ to discuss our responsibility to conduct remediation activities when modern slavery impacts are identified within our value chain. The workshop outlined key remediation concepts, relevant example cases and priorities for Orica in developing our remediation approach. The learnings from this engagement will help improve our due diligence and remediation mechanisms.

Remediation

Our Code provides information on the mechanisms available to report incidents, concerns, suspicions or allegations of modern slavery, or a failure to uphold human rights. This includes access to an independently hosted, confidential and multilingual Speak Up service which is available via hotline, website and mobile.

Our Whistleblower Policy outlines the process and protections available to potential whistleblowers, who and where they can make reports to, and our process for investigation. Our Whistleblower Policy defines 'eligible reporters' widely to include suppliers and workers in our supply chain. All reporters are entitled to remain anonymous.

Over the reporting period we received a total of 185 reports. There were no reports involving allegations of modern slavery or a failure to uphold human rights. Additional information about our whistleblower reports and reporting process can be found in our FY2023 Annual Report.

Where concerns are raised through available mechanisms, a review process is undertaken and a response determined, according to the framework in our Group procedure.

15. United Nations Human Rights Office of the High Commissioner (2011). Guiding principles on business and human rights – Implementing the United Nations "Protect, Respect and Remedy" Framework. New York and Geneva: United Nations. www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

Investigating and providing remedy

Improving Orica's remediation processes to ensure alignment with industry best practice approaches continues to be a focus.

All reports are taken seriously and acted upon in accordance with our Whistleblower Policy and Our Code. Depending on the nature of the report, it may be investigated by an external provider or by an authorised person within Orica. In all instances, Orica identifies and complies with applicable laws.

Investigations are undertaken by an authorised impartial investigator, independent of the business area concerned and any person who is the subject of the reportable conduct. Orica takes practical steps to protect the confidentiality of the reporter and actual and suspected reporters from retaliation and detriment.

Orica has a clear process for determining whether a report requires an investigation, the indicative steps of the investigation, and how the findings from the investigation will be documented and reported to relevant stakeholders, including the reporter if they have elected to be contactable. Where this is the case, Orica provides regular updates to the reporter on the progress and outcome of the investigation.

Where Orica identifies a potential situation of modern slavery, we are committed to acting in the best interest of impacted individuals and providing remedy where we have caused or contributed to the situation. Remedy may be provided with the aim of making good any harms experienced by impacted individuals and taking steps to ensure the situation does not recur. This includes efforts to identify and address the root cause of the exploitation and considering if appropriate changes are

required in our systems and processes to strengthen prevention of exploitation.

In FY2023, an audit conducted at an Orica manufacturing site on behalf of a customer identified records of excessive overtime at the site. To understand the root cause of the issue, we reviewed the findings and investigated, finding the overtime was the result of voluntary agreements made by some workers on the shopfloor that were not raised to management for approval. Orica advised the site to ensure no overtime is allowed without written notification to the relevant HR business partners. Workers who worked overtime were duly paid for the overtime at double the normal rate of their remuneration as prescribed under the relevant laws. Orica recognises that excessive overtime can be an indicator of the presence of exploitative practices, and should be corrected to prevent a situation becoming one of modern slavery.



ASSESSING EFFECTIVENESS

Orica assesses our approach to modern slavery using an internal framework to track key commitments and goals.

Orica continues to review and assess the effectiveness of our policies, processes and procedures in line with emerging best practice. Orica assesses effectiveness in several ways.

Method	Detail
Progress against priorities	Orica tracks progress against our priorities to remain accountable for our initiatives. Response rate of high-risk supplier SAQ engagement is tracked, which was 76 per cent.
Grievance mechanism monitoring	Orica's Ethics and Compliance function is responsible for our global whistleblower approach. Orica monitors whistleblower reports to track emerging themes and issues related to modern slavery.
Training	Orica delivers training on modern slavery awareness and our processes to address modern slavery risks and impacts to key employees across our business. Training completion rates are tracked. In FY2023, all required employees completed their modern slavery training.
Orica's business functions, including Internal Audit	Various Orica teams assess the effectiveness of our modern slavery actions. Orica's Internal Audit function assesses our internal business controls and processes, including alignment to procurement standards across our regional procurement functions. In FY2023, Internal Audit conducted a review of Orica's ESG policies and processes, including our processes for addressing modern slavery risk. The audit identified one instance where a supplier did not have a forced labour clause included in their contract, which has since been resolved. Orica will use the learnings of this audit to support the continued uplift in our modern slavery program.

As Orica's modern slavery approach matures, we will continue to update our methods for evaluating the effectiveness of our actions to address modern slavery risk. This will include key performance indicators as outlined in our Human Rights Risk Appetite Statement.



CONSULTATION AND APPROVAL

Orica operates and is managed as an integrated group with overarching policies, standards, systems and processes designed to be consistently applied to our controlled entities. In accordance with our operating model, Orica engaged with:

- our Modern Slavery Working Group, which includes representatives from Ethics and Compliance, Global Supply Chain, Legal, Risk and Assurance, Finance, Human Resources and Sustainability
- each of the Reporting Entities covered by this Statement to confirm the alignment of due diligence processes across the business (noting that some Reporting Entities are part of the Orica Group and operate as a consolidated group supported by various functional teams such as Global Supply Chain)
- regional teams, including regional supply chain teams
- key internal stakeholder engagement as part of the risk assessment and gap analysis process undertaken during FY2023.

Prior to submission to the Board for review and approval, the Statement was reviewed by each member of the Modern Slavery Working Group, General Counsel – Corporate, Chief Communications Officer, Vice President – Corporate Affairs, Head of Sustainability, Company Secretary and President – SHES, Discrete Manufacturing and Supply.

This Statement has been approved by the following Boards:

- Orica Limited on behalf of the Reporting Entities other than Orica Mining Services Pilbara Pty Ltd on 8 November 2023; and
- Orica Mining Services Pilbara Pty Ltd on 8 November 2023.



Sanjeev Gandhi
Managing Director and
Chief Executive Officer
Orica Limited



Germán Morales
Chairman of the Board
Orica Mining Services
Pilbara Pty Ltd

Reporting Entities

This is a joint statement comprising the following reporting entities under the Australian Act (Reporting Entities), referred to as we, us, our or Orica:

Table 4: Relevant reporting entities

Reporting Entity	Type of activities of the reporting entity	Location of reporting entity
Orica Limited (ACN 004 145 868) which is the ultimate holding company in the Orica Group	Corporate and support costs	Australia
Orica Investments Pty Ltd (ACN 009 781 257)	Corporate and support costs	Australia
Orica Australia Pty Ltd (ACN 004 117 828)	Manufacture and supply of commercial explosives and blasting systems	Australia
Orica Mining Services Pilbara Pty Ltd (ACN 158 151 369)	Manufacture and supply of commercial explosives and blasting systems	Australia

A full list of controlled entities in the Orica Group is included in Note 23 List of Controlled Entities in our FY2023 Annual Report. Orica Investments Pty Ltd is the holding company of many of our controlled entities (including overseas controlled entities) while Orica Limited is our 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 2022 to 30 September 2023. 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.

