

# MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Orica\* opposes any form of human rights violation. This Statement is made pursuant to s54 of the U.K. Modern Slavery Act 2015 and sets out the steps that Orica has taken during the 12 months ending 30 September 2018 to prevent slavery and human trafficking in our supply chain, or any part of our business.

## ABOUT ORICA

Orica is the world's largest provider of commercial explosives and innovative blasting systems to the mining, quarrying, oil and gas and construction markets, a leading supplier of sodium cyanide for gold extraction, and a specialist provider of ground support services in mining and tunnelling.

## OUR POSITION

Orica is committed to maintaining and improving systems and processes to avoid complicity in slavery or human trafficking.

## OUR COMMITMENT

At Orica, how we do business is as important as what we do. Demonstrating integrity and strict discipline around compliance is the right and lawful thing to do and a reflection of our broader commitment to operational excellence and risk mitigation.

At Orica, we are opposed to any form of slavery or human trafficking, and are committed to maintaining and improving systems and processes to avoid complicity in slavery or human trafficking.

We respect and support the rights of our people to a healthy, safe and secure working environment, a workplace free of discrimination and freedom of association.

We are also committed to preventing the use of all forms of forced, compulsory or child labour in our operations. We strongly support the policy behind the U.K. Modern Slavery Act 2015.

## OUR PROCESSES & PROCEDURES

As part of Orica's ongoing commitment to continuous improvement regarding human rights performance, in FY18 we continued to invest time and resources to assess the risk of human rights violations in our own operations, and our supply chain, and develop appropriate controls.

We continued the establishment of an entirely new set of Group Procedures that form part of the Group Documents that govern how Orica operates. Group Documents ensure that the Orica Group operates as one organisation throughout the world, with common processes and systems underpinning the way they work. For example, this included the establishment of a Country Entry Group Procedure that specifically requires consideration of human rights risks related to counterparties within the supply chain when considering establishing a presence in a new country.

## INTEGRITY AS PART OF CORPORATE CULTURE

At Orica, integrity is one of our core values recorded in our Charter. During FY18, we achieved several major milestones in further strengthening our culture of integrity and ensuring our employees have the guidance and resources required to live up to our value of integrity in everything they do – examples of which are set out below.

We refreshed our Code of Business Conduct which outlines the expected behaviours of the people who work for, or on behalf of Orica, as they go about their work across the marketplace and in communities around the globe.

The scope of the Code of Business Conduct is extensive and includes a specific section on upholding human rights (see p 20) as well as clear expectations around compliance with regulations, Our Values and Group policies and standards. It is a condition of working for, or with, Orica that people abide by Our Values and Our Code.

If a breach of the Code of Business Conduct is suspected, concerns can be raised confidentially and anonymously through the Orica Speak-up service.

The Speak-up service is available globally and is operated by an independent provider. In FY18, the Speak-up service was made available to external parties such as partners, customers and suppliers as well as to all Orica employees and contractors.

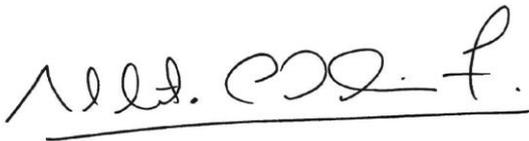
We have also established an Ethics & Compliance Group Standard and a dedicated Ethics & Compliance team. The team is led by the Chief Compliance Officer. Additional support is provided by Regional Ethics & Compliance Managers who are co-located with management in each Region but report independently through the Chief Compliance Officer to the Group General Counsel.

Our Ethics & Compliance team continued the roll out and implementation program for the new Ethics & Compliance Group Standard including key joint ventures and new acquisitions.

## NEXT STEPS

In furtherance of our commitment to continuously improve human rights performance, in FY19 Orica will: establish the remaining Group Procedures; and continue to identify opportunities to embed the identification and support for human rights issues in Procedures and other processes.

Orica will continue to update this Statement annually.



**Alberto Calderon**  
**Director, Orica Limited**  
**November 2018**