



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 2019 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 FY19 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.

During FY19 we deactivated approximately 40% of our suppliers thereby limiting the number of supply chains with which we are connected and enabling us to reduce the risk of human rights violations in our supply chains.

We also further strengthened our procedures and the tools that we use in order to regulate the appointment of all Business Partners throughout Orica. These procedures seek to ensure that all Business Partners are reviewed by the Ethics & Compliance team and are subjected to a level of due diligence and review which is commensurate with the risks associated with the proposed engagement. Encapsulated within the revised process is a requirement for all Business Partners to confirm that they have read and understood Orica's commitment to ethical conduct as set out in detail in our Code of Business Conduct.

INTEGRITY AS PART OF CORPORATE CULTURE

At Orica, integrity is one of our core values recorded in our Charter. During FY19, 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.

*Throughout this statement, the term *Orica* refers to Orica limited and its subsidiaries

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.

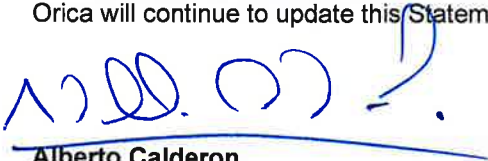
Our refreshed Code of Business Conduct was introduced in September 2018 and to further embed this within Orica, in FY19 mandatory Code of Business Conduct training was introduced. The training was offered in 13 different languages in alignment with Our Code and was available online via our learning platforms and in offline formats for individuals with limited internet access.

The training contained a video from our CEO and training modules relating to conflicts of interest, social media and confidentiality, how people can report concerns, and the proper use of Orica resources. Every Orica employee and contractor was required to successfully complete an assessment which contained questions on the entirety of Our Code including the modules covered in the training.

NEXT STEPS

In furtherance of our commitment to continuously improve human rights performance, in FY20 Orica will continue to develop our speak-up service and reporting mechanisms to aid people to raise any concerns about actions or behaviours that do not reflect our commitment to human rights. This will include implementation of a whistleblower policy and review of our investigation protocols and procedures.

Orica will continue to update this Statement annually.



Alberto Calderon
Director, Orica Limited
November 2019