

ORICA NORWAY AS – NORWEGIAN TRANSPARENCY ACT STATEMENT

The Norwegian Transparency Act entered into force on 1 July 2022 (**the Act**). The purpose of the Act is to promote businesses respect for fundamental human rights and decent working conditions, and ensure public access to information. The Act requires companies to conduct due diligence assessments to identify actual or potential negative impacts on fundamental human rights and decent working conditions in their own operations and in their supply chain. Orica Norway AS (**Orica Norway**) is covered by the Act and provides this statement in accordance with the requirements under the Act.

ABOUT ORICA NORWAY AS

Orica Norway is a wholly owned subsidiary of Orica Group (**Orica**) and its main business activity is distribution of explosives and detonators for civil purposes, currently employing about 100 employees. Orica Norway operates within Orica as a consolidated group which has operations in 45 countries with customers in more than 100 countries and supported by various functional support teams including by a dynamic and complex global supply chain (**Global Supply Chain**).

As a subsidiary of Orica (via Orica Investments Pty Ltd and ultimately Orica Limited), Orica Norway is required to adopt, and operate in accordance with, all of Orica's Group Standards, Policies and procedures including those that are related to human rights, as set out below. It is also a controlled subsidiary covered by Orica's Modern Slavery Statement for FY2022 (link can be found here: [Modern Slavery Statement](#)).

For further information about Orica Group's business and structure, global network and how it addresses human rights issues, please refer to our Annual Report and Sustainability Report which can be found on our website www.orica.com.

Our commitment for a safe and responsible business can be found by following this link <https://www.orica.com/Sustainability/responsible-business>.

OUR POLICIES AND COMMITMENT

Orica respects and upholds the human rights of our employees and our people and those impacted by our operations and business relationships in the communities in which we operate. Our approach to human rights is based on internationally recognised standards and codes, including the United Nations (UN) Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work. Our commitment to human rights, labour rights and decent work is enshrined in our Code of Business Conduct (**Our Code**), Human Rights at Work Policy and Responsible Sourcing Statement. As our supply chain activities can give rise to social and environmental impacts, the below policies apply to our suppliers as well as our people. Supplier non-compliance with our policies may result in corrective action and regular reporting on progress through Orica's Supplier Management Plan. Termination of contract may be considered for material breaches. Our policies are publicly available on our website.

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. It clearly outlines our expectations for individuals to understand and follow the specific requirements of Our Code, demonstrate our values, and comply with relevant laws and regulations and any additional Orica policies, standards or procedures. We expect individuals and entities to which Our Code applies to ensure they:

- prioritise health and safety
- value others and respect human rights
- work with and support communities.

Human Rights At Work Policy: Our Human Rights at Work Policy applies to our business and all third parties we deal with, including suppliers, customers, community partners and contractors. The Policy sets out the core principles that apply to work locations in a global context. All employees are made aware of Orica's global policies including our Human Rights at Work Policy through our intranet systems and through required training. We also request compliance with our policies in the tendering stage of our procurement process and include alignment with our policies as part of our agreements with suppliers. Our principles include the rights of individuals to:

- a workplace free of discrimination and harassment
- freedom from child labour, forced labour, indentured labour and any form of human trafficking
- a healthy and safe workplace
- appropriate pay and working hours
- freedom of association
- collectively or individually bargain, and join, or not join, a legally recognised trade union or third-party representative organisation
- choose employment freely.

Speak Up Platform: Our Code and Human Rights at Work Policy provide information on grievance mechanisms available to report a concern or a breach of Our Code or relevant legislation in the countries we operate, including access to an independent, confidential and multilingual 24 x 7 Speak-Up service. We are committed to ensuring everyone can raise concerns anonymously, freely without fear of reprisal or intimidation, and that any complaints are dealt with fairly, thoroughly and in a timely manner.

Responsible Sourcing Statement: In FY2022, we finalised our standalone Responsible Sourcing Statement, outlining our expectations of suppliers regarding ethical behaviour, human and labour rights including forced labour, and the management of social and environmental impacts. It will be introduced to all suppliers and potential suppliers in FY2023.

ASSESSING AND MANAGING RISK

Assessing and Managing Human Right Risks in Our Operations

Orica Norway's risk management framework and assessment is included in the broader framework and assessment of Orica. As a group, we conduct business activities in many countries, including countries with a heightened risk of modern slavery and adverse human rights impacts. In terms of human right risks, the effectiveness of our governance framework and processes in identifying and addressing human rights issues was reviewed in FY2020 – for further information, please refer to our Sustainability Report which can be found at <https://www.orica.com/sustainability>.

Below is a summary of Orica Group risk profile in terms of human rights and modern slavery.

Human Rights / Modern slavery risk in operations by type	FY2022 Human Rights/ Modern slavery risk profile
Operations and/or offices in countries with heightened human rights risks ¹	We have operations and/or offices located in countries with heightened human rights and modern slavery risks, including China, the Democratic Republic of Congo, Mauritania, Papua New Guinea and the Philippines
Non-operated joint ventures	We have a number of non-operated joint ventures located in high-risk countries including China.
Equity investments in entities operating in countries with increased human rights risks	We have a number of equity investments globally. Some of these investments are in high-risk countries.
Merger & Acquisition (M&A) activity	We consider various M&A targets operating in high-risk countries and sectors.
Customers operating in countries with increased human rights risks	We are a supplier of products and services to customers located in countries with heightened human rights and modern slavery risks. Due to the nature of our product, we have a significant risk assessment and screening process in place for customers as part of our Country Entry procedures.

Our operations are supported by robust systems and prudent practices. Due diligence activities occur prior to new business activity, such as entering a new country or engaging with a new business partner, and mergers and acquisitions.

Country entry procedure: Many of our new growth opportunities are in countries with heightened operational, security, compliance, modern slavery and reputational risks. The primary tool for managing these risks is our country entry procedure. For countries where the risk can be managed within our defined appetite, and we elect to enter and undertake business activities, risks are identified and managed with mitigation controls including those designed to reduce the risks of directly or indirectly engaging in modern slavery practices.

Business partner screenings: 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 done by our 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.

Orica Norway also have other measures in place for other aspects of our operations on how we ensure HSE, safety, and equality for its employees.

Gender equality and inclusion: At the end of the FY22 financial year, Orica Norway had 109 employees, 15 of whom are women (14 per cent). The company's average number of full-time equivalents was 107 for

¹ High risk as identified by Orica's country risk score, developed using data from the Global Slavery Index, International Trade Union Confederation Global Rights Index, US Department of States Trafficking in Persons Report and Unicef's Child Labour data.

2022. The proportion of women in administrative positions is 21 per cent, while the proportion of women in management positions is 18 per cent. Although this figure is low, it must be considered in light of the businesses served, i.e. mining, construction and services to this industry, which have traditionally attracted men.

Orica Norway's policy is that work of equal value should result in equal pay. As a global company, we want to attract and retain talent at all levels from the geographies in which we operate. We uphold our duty of care by striving to create work environments where employees from all backgrounds are treated with respect, feel included and are supported to succeed and achieve their full potential. We seek to build and maintain a corporate culture where differences are respected and valued. This is at the centre of the Group's Diversity and Inclusion Policy, which also confirms Orica's commitment to equal employment opportunity and to supporting diversity and inclusion in the workforce. The Diversity and Inclusion Policy covers Board members, employees and contractors engaged by Orica, at all levels and in all aspects of our business. It was updated and approved by the Orica Limited Board in August 2020 and is also applicable to Orica Norway.

Orica Norway works actively, purposefully and systematically to promote gender equality within the organisation in accordance with Orica's Global Talent Procedure. The various grounds for discrimination defined by the Gender Equality Act are covered by both the Diversity and Inclusion Policy and Our Code and Charter. The Diversity and Inclusion Policy also recognises the need for flexibility and balancing work and personal commitments at different career and life stages.

Health, Safety and Environment (HSE): HSE is defined as one of the company's key values. The company focuses on effective management systems, a high technical standard at its production facilities and seeks to create a culture where all employees take active responsibility for HSE work.

HSE work shall be a priority area at all levels of the company and shall be carried out on the basis of clearly defined standards, programmes and targets to avoid accidents, injuries, reduce the environmental impact and avoid uncontrolled emissions. The preparation of a new management system for internal control and quality was initiated in 2010. The system is fully operational, but work is ongoing to improve procedures, documents and the system in general and to adapt to changes in Orica's central HSE system and laws and regulations. In recent years, Orica has increased its focus on "Major Hazards" (MH), i.e. hazards that can cause accidents with major consequences (fatalities, major emissions and the like). This year a new initiative has been implemented to include a new MH regarding Environmental control called Environmental MH. Active efforts have been made to identify the relevant major hazards and to verify that the necessary safety measures are in place.

Orica Norway's management closely monitors HSE work in various parts of the company and the company's Board of Directors is kept informed of ongoing activities in this area. Orica Norway works continuously to eliminate the underlying causes of injuries and accidents at all levels of the organisation to prevent recurrence. This has included careful follow-up of all types of accidents and injuries, "near misses" and the implementation of preventive and corrective measures.

Regarding environment, the handling, manufacture and transport of explosives are the activities in the company's operations that have significant hazard potential. Comprehensive standards and best practices have been established for the organisation 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 and in accordance with national and international regulations for dangerous goods vehicles.

Further information can be found in Orica Norway FY22 Annual Report.

Assessing and Managing Human Right Risks in Our Supply Chain

Orica Norway sources most of its supply through and from other Orica entities, including from Orica Sweden AB, which are supported by the Global Supply Chain. Accordingly, the risk assessment was done as a part of Global Supply Chain risk assessment. Please refer to our Modern Slavery Statement for further information on risk assessment.

To better understand the risk of modern slavery in our Global Supply Chain, we identify high-risk suppliers against the following risk factors: (1) Country of incorporation: we have suppliers located in countries associated with a heightened risk of modern slavery practices and (2) Category of supply: we procure goods and services associated with higher rates of modern slavery being present². These include:

² Determined by referencing external indices and data published by the International Labour Organisation, OECD, World Vision, UK Home Office, Sedex, EU Mobility Atlas and Global Slavery Index on modern slavery risks for commodity/products/services, vulnerable worker populations and countries of export.

Category of supply	Type of heightened huma rights/modern slavery risk
Bulk (raw materials, including chemicals)	Forced labour and the worst forms of child labour
Electronics	Forced labour and the worst forms of child labour
Personal protective equipment and safety gear	Forced labour and debt bondage
Transport and logistics services (including road and sea freight)	Forced labour, debt bondage and human trafficking
Facilities maintenance services (including cleaning)	Forced labour and debt bondage
Security services	Forced labour and debt bondage

Sub-contracted or third-party labour and may have a higher risk of modern slavery and introduce complexity into our supply chain. Our risk assessment model considers the use of sub-contracted labour. Suppliers are assessed annually and those suppliers with higher-risk profiles are prioritised based on spend. Our supplier selection process involves qualification procedures to ensure qualified suppliers meet our safety, sustainability, compliance and performance criteria.

In 2021, Orica developed and launched our Modern Slavery Risk Management Plan (MS Risk Management Plan). This provides our Global Supply Chain team with practical guidance and supporting tools for identifying and managing modern slavery risks through the procurement process. The MS Risk Management Plan and tools were tested in FY2021 for their effectiveness and practicality as part of our pilot program, with high-risk suppliers and prospective suppliers sent a modern slavery self- assessment questionnaire (SAQ) to complete. Following feedback from the pilot program, the questionnaire was streamlined in FY2022, made available online and in multiple languages to improve accessibility. Further work will be undertaken on the SAQ to provide further clarity as analysis has shown some suppliers misinterpreted the intent of some questions, triggering false red flags. Further information in relation to this can be found in our Modern Slavery Statement.

REPORTING, INVESTIGATION AND REMEDIATION

Reporting Concerns and Breaches

Incidents, concerns, suspicions or allegations of modern slavery, or a failure to uphold human rights as set out in Our Code, can be reported to a confidential Speak-Up service hosted by an independent third party. The service can be used by all stakeholders including suppliers and workers in the supply chain. Reports can be made at any time and in multiple languages using a hotline or the Speak-Up service website. Reporters also have the option to remain anonymous. Our Whistleblower Policy plays an important role in maintaining our speak-up culture across all Orica Group entities and operations. The Policy explains how individuals can report potential misconduct and how we will respond when an investigation is conducted. This includes how we will ensure practical protections for reporters (whistleblowers) against detriment including reprisals, and how we will maintain confidentiality, even when the report is not made anonymously.

Our Whistleblower Policy was updated in FY2022 to explicitly include human rights abuses as an example of reportable conduct. We clarified that the Policy applies to our operations globally, including our suppliers, and must be considered in conjunction with the laws of any country in which we operate. We also strengthened the Policy's effectiveness to align with the UN Guiding Principles on Business and Human Rights regarding grievance processes. To ensure our processes are equitable, legitimate, predictable, transparent and accessible.

Further information can be found in our Modern Slavery Statement.

Investigating Potential Issues and Providing Remedy

All reports are taken seriously and acted upon in accordance with the principles and processes outlined in our Whistleblower Policy and the Reporting and Investigations procedure of Our Code. When a concern or incident is reported, either through the Speak-Up service or directly, it is assessed and investigated to determine if there has been wrongdoing, a breach of Our Code, illegal activity, or human rights impacts including modern slavery. 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, we identify and comply with applicable laws.

Where we identify a potential situation of modern slavery or human rights, 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.

Training and capability development

Building the awareness and capability of our employees to identify and mitigate modern slavery and human rights violation in our operations and supply chain is vital. As we strengthen remediation and human rights due diligence approaches in the coming year, this will include appropriate training for key personnel. We also aim to keep key executives and Board members aware of shifts in approaches to modern slavery and broader respect for human rights, including regulatory and reporting requirements. Mandatory supply chain training on modern slavery & human rights was deployed across all global supply chain roles in 2022. The training included modules on tackling forced labour in business and assessing and managing modern slavery risk in the supply chain. The modules were designed to assist our supply chain team members to: gain an understanding of modern slavery; know where it exists and how to identify it and develop a deeper understanding of our supply chain Modern Slavery Risk Management Plan and their role in managing our risk.

Assessing effectiveness & Strengthening Our Foundations

Throughout FY2022, we have regularly assessed our approach to modern slavery & human rights using an internal framework to track key commitments and goals. As we look to strengthen our foundations by implementing actions to address our gaps, we will continue to review and assess the effectiveness of our policies, processes and procedures in line with emerging best practice. Addressing human right risk requires ongoing, dedicated and collaborative effort from all businesses. We have made progress but recognise there is much more to do. We are committed to continually improving how we protect the people who work within our operations and across our supply chain and will focus our efforts on three areas: strengthening our foundations, building training and capability, and collaboration.

From an operational perspective, we will:

- refine our risk identification and assessment methodology for human rights in both operations and supply chain
- embed explicit consideration of human rights in due diligence processes for higher-risk business activities as part of a broader enhanced approach to human rights and environmental, social and governance (ESG) due diligence
- strengthen our remediation processes to align with established good practice in relation to modern slavery and human rights
- develop clear objectives and indicators for measuring the effectiveness of our actions to assess and address modern slavery and human rights
- strengthen our governance structures by formalising responsibilities and accountabilities to address modern slavery and human rights risk
- continue to integrate modern slavery & human right risks into existing risk management processes including defining a risk appetite for human rights and modern slavery.

From a supply chain perspective this includes:

- engaging a larger number of high-risk suppliers (existing and prospective) to complete a modern slavery SAQ
- working to enhance our ongoing engagement with suppliers by automating stages of the due diligence process through the integration of the modern slavery & human rights SAQ onto the Ariba platform (SLP)
- directly communicating our Responsible Sourcing Statement and updated Whistleblower Policy to suppliers.

Building Training and Capability: We continue to embed awareness through Our Code training program and mandatory training requirements. Building on an analysis of our training needs, we will also develop training for employees identified as having key responsibilities in relation to modern slavery and human rights.

Collaborating

We will work collaboratively with our industry partners, customers, peers and government, support the work of non-government organisations, where possible, and leverage emerging best practice to improve our own performance.

Information Request

If you would like to request further information on how Orica Norway is managing actual or potential human rights impacts, you can contact us at <https://www.órica.com/Contact-Us> or by email at nordics@órica.com.

Approved and Signed by the Board of Directors of Orica Norway AS

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