



Policy - Modern Slavery

Document Number: POL-IPLG-PROC-000015

Policy Owner: Chief Strategy & Sustainability Officer

Effective Date: 19 December 2019

Status: Released

Table of Contents

1. Purpose	3
2. Scope	3
3. References & Definitions	3
3.1 References	3
3.2 Definitions	3
4. Roles & Responsibilities	4
5. Policy Statement: Supply Chain.....	4
5.1 Identification of Risk in the Supply Chain.....	4
5.1.1 Supplier Tiering Tool	4
5.1.2 Supplier Risk Questionnaire	5
5.2 Supplier Risk Management.....	5
5.3 Actions to Address Identified Risks in the Supply Chain.....	5
5.4 Employee and Contractor Awareness.....	5
5.4.1 Training.....	5
5.4.2 Reporting	5
5.4.3 Supplier Awareness	5
6. Policy Statement: Dyno Nobel's Own Operations.....	5
6.1 Identification of Risk in Dyno Nobel's Operations.....	6
6.1.1 Risk of Child Labour.....	6
6.1.2 Risk of Abuses by resources employed by, or contracted to, Dyno Nobel.....	6
6.1.3 Provision of Formal Grievance Mechanisms to Employees and Local Communities.....	6

DYNO NOBEL LIMITED (**'Dyno Nobel'**) and its subsidiaries support eradication of Modern Slavery and are committed to taking all reasonable steps to identify, assess and address risks of Modern Slavery in their operations.

1. Purpose

This Policy will be used to underpin and inform any statement by Dyno Nobel on the potential risks of Modern Slavery practices in its operations and supply chains in accordance with the requirements of the Modern Slavery Act.

2.Scope

This Policy applies to all persons working for and on behalf of Dyno Nobel, in any capacity, including employees, directors, officers, agency workers, contractors and consultants and any other third-party representative.

It applies to all purchases made to suppliers who are set up in the ERP system.

Each of the various teams accountable to raise purchase orders, will have a method of implementation and compliance oversight that gives effect to the policy.

3.References & Definitions

3.1 References

Table 1: References

Reference	Title
https://www.dynonobel.com.au/globalassets/corporate-shared-assets/document-centre/policies-and-governance/dyno-nobel-human-rights-policy-english.pdf	Human Rights Policy
https://www.incitecpivot.com.au/~media/Files/IPL/Procurement/IPL_Supplier%20Code%20of%20Conduct_2019_v5.pdf	Supplier Code of Conduct

3.2 Definitions

Capitalised terms used in the Policy have the following meaning:

HSEC Company Standard 11 means the current version of the standard available on Dyno Nobel's electronic document management system.

ERP means Enterprise Resource Planning system, the integrated management of main business processes.

Dyno Nobel means Dyno Nobel Limited and its subsidiaries.

Modern Slavery has the same meaning as in the Modern Slavery Act. The term is used to cover a range of exploitative practices, including without limitation human trafficking, slavery, forced labour, child labour and debt bondage. **Modern Slavery Act** means the Modern Slavery Act 2018 (Cth) as may be amended from time to time.

Whistleblower Hotline means the mechanism to confidentially report improper, illegal or unethical behaviour made available pursuant to the Whistleblower Protection Policy.

Whistleblower Protection Policy means the principles by which a person can raise a known or suspected an issue of unacceptable conduct.

4. Roles & Responsibilities

Table 2: Roles & Responsibilities

Role	Responsibilities
Executive Commercial Officer	Policy Owner
Dyno Nobel Board of Directors	Overall responsibility in ensuring Dyno Nobel complies with all its legal and ethical obligations
Executive Team	Responsible for ensuring their teams comply with the provisions of this policy in the day to day performance of their roles.
Line Managers	Responsible to ensure that relevant direct reports receive adequate training on this policy and any supporting processes applicable to their role.

5. Policy Statement: Supply Chain

This policy section defines the processes that identify and address modern slavery risks within Dyno Nobel's supply chains.

It aligns with Dyno Nobel's Values of:

- Zero Harm for Everyone, Everywhere,
- Value People – Respect, Recognise and Reward,
- Care for the Community and our Environment,
- Challenge and improve the Status Quo

5.1 Identification of Risk in the Supply Chain

The following tools will be used to both identify and mitigate any potential risks of modern slavery within Dyno Nobel's supply chains. They are designed to support those undertaking supplier due diligence activities in the identification of modern slavery related risk.

5.1.1 Supplier Tiering Tool

Analysis of existing supplier spend is carried out using the Supplier Tiering Tool. This assesses annual spend, the risk associated with goods and services purchased, and the supplier's country of origin.

The tool provides an overall ranking which identifies the higher risk suppliers, to enable a prioritised, detailed risk assessment to be actioned.

5.1.2 Supplier Risk Questionnaire

Existing Suppliers

A Risk Questionnaire is applied to existing suppliers that are ranked as high risk through the application of the Supplier Tiering Tool, this will then be applied to mid to low risk suppliers.

New Suppliers

For potential and new suppliers, the Risk Questionnaire will be sent to these suppliers as part of the standard Procurement sourcing process.

5.2 Supplier Risk Management

Questionnaire responses that highlight a potential risk will be investigated. Where required, a remedial action plan will be agreed with the supplier with defined objectives and time frames to achieve these.

5.3 Actions to Address Identified Risks in the Supply Chain

A remediation plan will be agreed between Dyno Nobel and the supplier to determine the appropriate course of action to be taken within the agreed time frames. The remediation plan will be reviewed at regular intervals in conjunction with Dyno Nobel and the relevant supplier.

5.4 Employee and Contractor Awareness

5.4.1 Training

Selected employees and contractors are required to complete training modules to increase awareness of modern slavery and understanding of the risk factors, to assist in the identification of modern slavery risks within the Dyno Nobel supply chains.

Targeted training will be delivered to those individuals in roles identified as having higher exposure to Modern Slavery risk.

5.4.2 Reporting

Dyno Nobel employees and contractors are encouraged to report any known or suspected, on reasonable grounds, risks of Modern Slavery practices within Dyno Nobel's supply chains. The [Whistleblower Protection Policy](#) provides the guidelines associated with reporting.

5.4.3 Supplier Awareness

All Dyno Nobel suppliers are required to comply with the Dyno Nobel Supplier Code of Conduct and are required to work with Dyno Nobel on identifying and addressing the Modern Slavery risks in their respective supply chains.

All suppliers are expected to promptly notify Dyno Nobel of any identified or suspected, on reasonable grounds, risks of Modern Slavery practices within their own supply chains and cooperate with Dyno Nobel in relation to any remediation plan to address those risks.

6. Policy Statement: Dyno Nobel's Own Operations

This policy section defines the processes that identify and address the risk of Modern Slavery practices within Dyno Nobel's own operations.

It aligns with Dyno Nobel's Values of:

- Zero Harm for Everyone, Everywhere,
- Value People – Respect, Recognise and Reward,
- Care for the Community and our Environment,
- Challenge and improve the Status Quo.

6.1 Identification of Risk in Dyno Nobel's Operations

A review of operations and processes will be undertaken for those high risk countries which have not signed the UN Declaration of Human Rights and/or where processes to prevent child labour or human rights abuses are not well entrenched in law.

6.1.1 Risk of Child Labour

Establish record keeping and due diligence processes (audits of records) in relation to the ages of all persons employed by Dyno Nobel operations in the countries identified in section 6.1.

6.1.2 Risk of Abuses by resources employed by, or contracted to, Dyno Nobel

Establish record keeping and due diligence processes (audits of records) in relation to the appropriate training of resources employed by Dyno Nobel in countries identified within section 6.1.

6.1.3 Provision of Formal Grievance Mechanisms to Employees and Local Communities

Provision of information regarding the Dyno Nobel Whistle Blower Hotline, a site contact or some other culturally appropriate mechanism for reporting potential issues at all Dyno Nobel sites, as auditable under HSEC Community Standard 11.