

CODE OF BUSINESS CONDUCT

YOUR GUIDE TO HOW WE DO BUSINESS 2022



SAFETY

RESPECT

TOGETHER

INTEGRITY

EXCELLENCE

CONTENTS

MESSAGE FROM THE CEO	3	SAFETY IS OUR PRIORITY. ALWAYS.	14	WE ACT WITH INTEGRITY.	23
OUR CHARTER	4	Follow safety controls and stop unsafe work	15	Comply with trade controls	29
YOU AND OUR CODE	5	Be fit and able to work safely	16	Say no to bribery and corruption	30
It is everyone's responsibility	5	Ensure the security of our people and products, always	17	Protect confidential information and avoid insider trading	32
Additional expectations of managers	6	WE RESPECT AND VALUE ALL.	18	Protect data privacy	34
Our Governance Framework	7	Value others and respect human rights	19	Compete ethically and lawfully	35
SPEAKING UP	8	Work with and support our communities	21	Act on conflicts of interest	37
Reporting a concern	9	Care for the environment	23	Take care with gifts and hospitality	38
Using the Speak-Up service	9	TOGETHER WE SUCCEED.	24	WE ARE COMMITTED TO EXCELLENCE.	40
Our response when you speak up	10	Share knowledge and challenges transparently with our Orica team	25	Use assets and resources wisely and maintain accurate records	41
Protections for people reporting concerns	10	Partner with customers for a better understanding and result	26	Protect our assets, equipment and property	43
If Our Code is found to have been breached	10			Protect our information systems, networks and devices	44
OUR CODE: QUICK TEST	11			SPEAK-UP HOTLINE	45
OUR CODE: YOUR GUIDE	12			Call these numbers to speak up	45

MESSAGE FROM THE CEO



Our Code of Business Conduct (Our Code) is our guide to doing the right thing. It explains what we expect from anyone who works for, or on behalf of, Orica. It gives us a shared understanding of how we will conduct ourselves as we work together to deliver on the purpose, vision, strategy and values in Our Charter.

The way we act influences what our customers, communities, suppliers, governments, shareholders and colleagues think of us. We always need to do the right thing, do what we say we will do, act safely and follow the law and Our Code.

In this update of Our Code, we have clarified our position on sexual harassment and modern slavery and bolstered the authority to stop work to protect people's safety, the environment and indigenous cultural heritage.

Please read Our Code carefully to understand how it impacts you, your role and the way in which you represent Orica. In conjunction with the policies, standards and procedures that underpin it, Our Code will help you make the right decisions.

If you see behaviours or actions that don't reflect Our Code, speak up. We are committed to ensuring that everyone can raise concerns freely, without fear of reprisal or intimidation, and that any concerns are dealt with fairly, thoroughly, confidentially and in a timely manner. Speaking up helps us to act on unethical or unsafe situations quickly and to put in place lasting improvements.

We are all expected to bring our best efforts to work every day and be accountable for our actions. Our Board, Executive Committee and I are deeply committed to Our Code. Together with Our Charter, it will guide us to success, today and into the future.

Sanjeev Gandhi
Managing Director and CEO

OUR CHARTER

Our Charter was originally launched in 2016 and was refreshed in 2021. Shaped by the voices and views of colleagues around the world, it articulates how Orica will be successful now and in the future.

Our values



Safety is our priority. Always.



We **respect** and value all.



Together we succeed.



We act with **integrity**.



We are committed to **excellence**.

Our Code helps bring Our Charter values to life every day, in all that we do.

OUR PURPOSE

Sustainably mobilise the earth's resources.

OUR VISION

To be the world's leading mining and infrastructure solutions company.

OUR STRATEGY

Deliver solutions and technology that drive productivity for our customers across the globe.

HOW WE WILL WIN



Smarter solutions



Optimised operations



Partnering for progress

**OUR CHARTER
IT STARTS
WITH US**



YOU AND OUR CODE

Our Code clearly explains what we expect from anyone who works for, or on behalf of Orica to meet our legal and ethical obligations. It guides us in how to recognise the risks we face in our work, maintain trust by doing what we say we will and build strong relationships.

Our Code applies to directors, officers, employees, contractors, suppliers and consultants. If you work for Orica, a subsidiary or a joint venture that is under our management anywhere in the world, Our Code applies to you.

IT IS EVERYONE'S RESPONSIBILITY

We expect everyone that we deal with - to demonstrate Our Values and comply with relevant laws and regulations, the requirements set out in Our Code, and any company policies, standards and procedures that apply.

This means you must:

- Demonstrate you have read and understood Our Code.
- Comply with the standards and requirements set out in Our Code.
- Comply with all applicable laws and regulations. Compliance with the law means observing the letter and spirit of the law as well as conducting business so that Orica and its employees are recognised as 'good corporate citizens'.
- Complete any training about Our Code and any other required training.
- Act to avoid, prevent or stop practices that could harm yourself, a colleague, customer, partner, the community, environment or our business.
- Speak up and report if you see or suspect something is wrong.

ADDITIONAL EXPECTATIONS OF MANAGERS

If you are a leader or manager of others, you must lead by example and demonstrate the spirit and intent of Our Charter and Our Code.

This means you must:

- Ensure your team understands Our Code and their responsibility to comply with it always.
- Ensure you promote Our Code in everything you do, and ensure that everyone who works for you completes all relevant training.
- Create an environment where people can raise concerns and incidents freely and safely.
- Act upon any concerns or incidents reported to you promptly and follow the correct procedure.
- Not retaliate, intimidate or victimise anyone who has raised a concern.

ALWAYS



- ✓ Understand and follow Our Code
- ✓ Follow Orica policies, standards and procedures and applicable laws and regulations
- ✓ Get the right approvals for your actions at the right time, following company standards
- ✓ Understand your legal obligations and responsibilities
- ✓ Stop any unsafe work, including situations where a major hazard key control is not in place
- ✓ Stop work if you identify a risk to indigenous cultural heritage
- ✓ Ask if you are not sure about something
- ✓ Speak up and report concerns or incidents promptly

NEVER



- ✗ Ignore a risk that can have a negative impact on safety, the community or environment
- ✗ Ignore a risk that can negatively impact on our ability to deliver quality products and services to our customers
- ✗ Look the other way when you see a potential breach of Our Code or the law
- ✗ Act without obtaining necessary approvals
- ✗ Fail to seek advice when you are unsure if a situation may breach Our Code or a Group Document
- ✗ Retaliate against or intimidate or victimise someone for reporting a concern

Refer to Our Code as often as you need to help you make the right decisions. If your role or location changes, read Our Code again carefully so you understand how it impacts your new circumstances and surroundings. If you are unsure about which laws and regulations apply, seek advice from your manager or the Orica Legal team to ensure compliance.

More information about the policies, standards and procedures that are referenced throughout Our Code is available on The Globe. If you do not have access to Orica's network or cannot locate what you need, ask your manager, Human Resources representative or contact codeofconduct@orica.com for help.

OUR GOVERNANCE FRAMEWORK

Our Code is overseen by Orica's Business Conduct Committee, which reviews compliance and reports any significant instances of non-compliance to the Board's Audit and Risk Committee. Orica's Internal Audit function monitors compliance with Our Code by performing audits. Our Code is also regularly reviewed and updated.

ORICA'S BOARD AND BOARD AUDIT AND RISK COMMITTEE

The Orica Limited Board has overall oversight on matters of corporate culture and will be informed of any material breaches of Our Code by a director or senior executive, and any other material breaches that call into question Orica's corporate culture.

The Board Audit and Risk Committee was established by the Orica Limited Board to assist the Board in the effective discharge of its responsibilities in relation to the matters set out in its Terms of Reference, published on orica.com. This includes reporting to the Board and taking reasonable steps in its oversight of:

- The adequacy of the processes and systems in place across the Orica Group.
- Legal and regulatory compliance.
- The effectiveness of the processes and systems in place for detecting, reporting and preventing inappropriate business conduct.

The Board Audit and Risk Committee also endorses and recommends to the Board for approval any policies within its remit that are applicable at a Group-wide level or amendments to such policies.

ORICA'S BUSINESS CONDUCT COMMITTEE

The Business Conduct Committee is a management committee established to oversee the promotion of Orica's values in our workplace culture to ensure continued business success. The Committee also assists the Board Audit and Risk Committee in the effective discharge of its responsibilities in relation to the matters set out above.

This includes reporting to the Board Audit and Risk Committee and taking reasonable steps in its oversight of:

- Development of policies (including Our Code), standards and procedures on conduct, ethics and compliance matters, and their implementation and effectiveness.
- The adequacy and performance of the business conduct program, systems and procedures in supporting people to raise concerns confidentially and securely, and the adequacy of investigations into those concerns. The Terms of Reference of the Business Conduct Committee are published on The Globe.
- Making available multiple ways for anyone to report a concern, including the Speak-Up service.

ROLE OF THE BUSINESS CONDUCT MANAGER

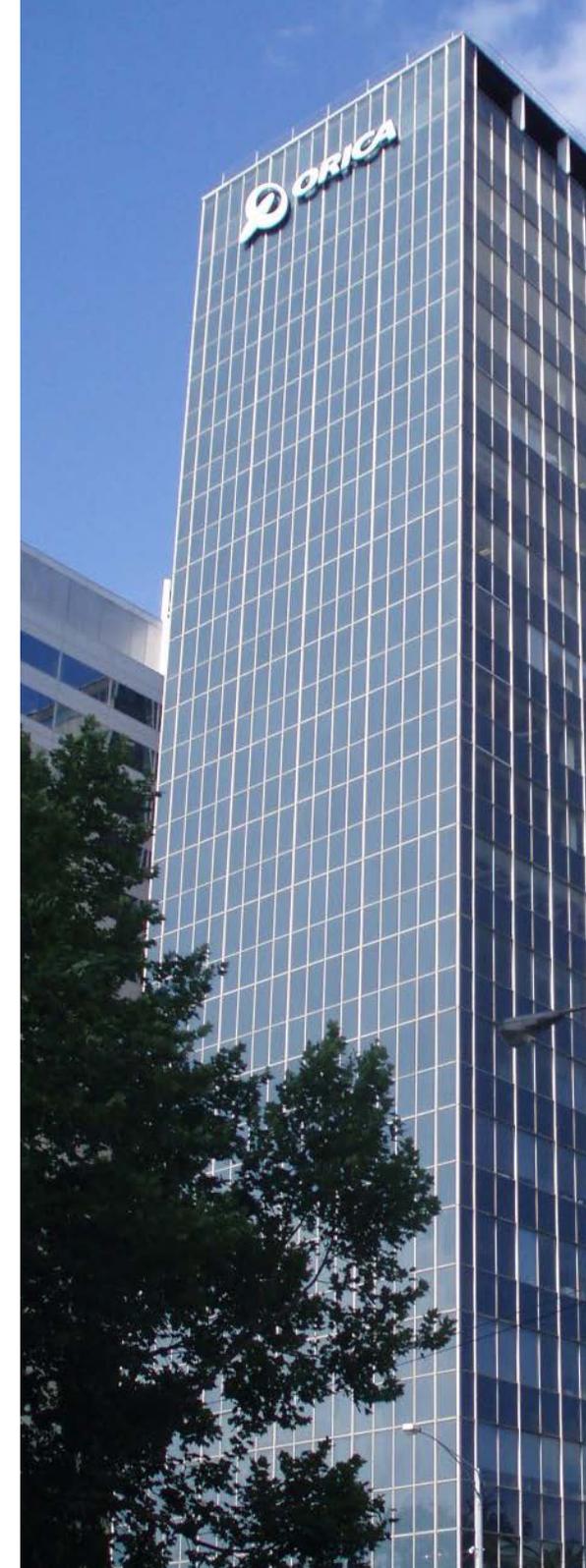
The Business Conduct Manager is accountable for the development and management of Our Code's investigation and reporting practices, in particular:

- Ensuring the integrity, confidentiality and timeliness of investigations into reported concerns.
- Reporting to the Executive Committee, Business Conduct Committee and Board Audit and Risk Committee.

INTERNAL AUDIT

From time to time, and at the request of the Business Conduct Manager, Internal Audit investigates allegations of breaches of Our Code related to theft, fraud or security matters.

Internal Audit also assesses the design and operating effectiveness of the internal controls on a rotational cycle, covering the investigation of reports of non-compliance with Our Code.



SPEAKING UP

We encourage everyone to speak up about things they think are wrong, are against the law or breach Our Code.

It is important that we all work together to ensure everyone can speak up without fear of retaliation. Speaking up helps to ensure safety and manage risks to our business. It also ensures we are all working to protect the long-term interests of Orica and its stakeholders.



You must speak up quickly if you see something that may be against the law or Our Code.

- Always speak up if you see retaliatory behaviour against someone who has reported an incident or concern.
- Never discourage someone from reporting an incident or concern.
- Never go along with any retaliatory behaviour directed against someone who has spoken out about an incident or concern.



REPORTING A CONCERN

There are many ways you can speak up. Start with a conversation, phone call or email to:

- your manager or an Executive Committee member
- a Human Resources representative
- a member of our Legal team
- a member of our Internal Audit team
- a member of our Ethics and Compliance team.

You can also send an email to codeofconduct@orica.com

If you no longer work with Orica but wish to report a concern, contact any of the above individuals or use our Speak-Up service.

USING THE SPEAK-UP SERVICE

To report anything you think is wrong, against the law or in breach of Our Code use the Speak-Up service. This confidential service is hosted by an independent third-party provider and available 24 hours a day, every day of the year. The service is also available in multiple languages. Generally, there is no restriction on the information that can be reported or your ability to report anonymously if you choose. If your location has specific legal requirements, the Speak-Up service will guide you.

As you make your report, our commitment to data privacy will be explained. You may be asked to provide consent allowing the service to collect, handle, transfer and store your personal information using the relevant system.

When making a report, it is important to provide as much detail as possible to support any allegations raised. This will assist teams in investigating the relevant allegations.



Hotline

(Toll-free numbers, available in multiple languages). See page 45 for details.



Online

orica.ethicspoint.com



Mobile

Scan QR Code with mobile device camera or visit link below:
orica.navexone.com

We aim to create an environment where everyone can report a concern or incident without fear of retaliation, victimisation or discrimination.

OUR RESPONSE WHEN YOU SPEAK UP

All reports are taken seriously and will be acted upon in accordance with the principles and processes outlined in our Group Procedure: Code of Business Conduct Reporting and Investigations.

If you speak up and report a concern or an incident, action will be taken to investigate and address the situation. Depending on the nature of the report, the concern may be investigated by an external provider or an authorised person within Orica.

In all instances we will comply with any applicable laws, ensuring that:

- Investigations are thorough and completed in a timely manner.
- We act impartially and with objectivity.
- We respect confidentiality and privacy.
- People reporting concerns are protected from reprisal.

PROTECTIONS FOR PEOPLE REPORTING CONCERNS

We are committed to ensuring that anyone can raise a concern freely, without fear of reprisal or intimidation, and that any concerns are dealt with fairly, thoroughly, confidentially and in a timely manner. Speaking up helps us to act on unethical or unsafe situations quickly and to put in place lasting improvements.

If you believe you are being, or have been, threatened, discriminated or retaliated against, victimised because you have made a report, or witnessed it happening to someone else, report it immediately to management or through the Speak-Up service.

Anyone found to have been involved in retaliatory behaviour will be subject to disciplinary action for breaching Our Code and may face termination of employment or contract.

If you provide your identity when making a report, it will be treated confidentially and disclosed only if we are compelled by law to do so, if you have given permission, or if we need to do so to complete an investigation. We will take steps to contact you before that happens.

If you report a concern anonymously, we will not seek to identify you.

IF OUR CODE IS FOUND TO HAVE BEEN BREACHED

Our Code is not negotiable. Failure to comply with it may result in:

- verbal or written counselling from your line manager
- verbal warnings
- written warnings or final written warnings
- termination of employment.

In some cases, breaching Our Code may also be a breach of applicable laws and the matter may be reported to the appropriate agency or regulator.

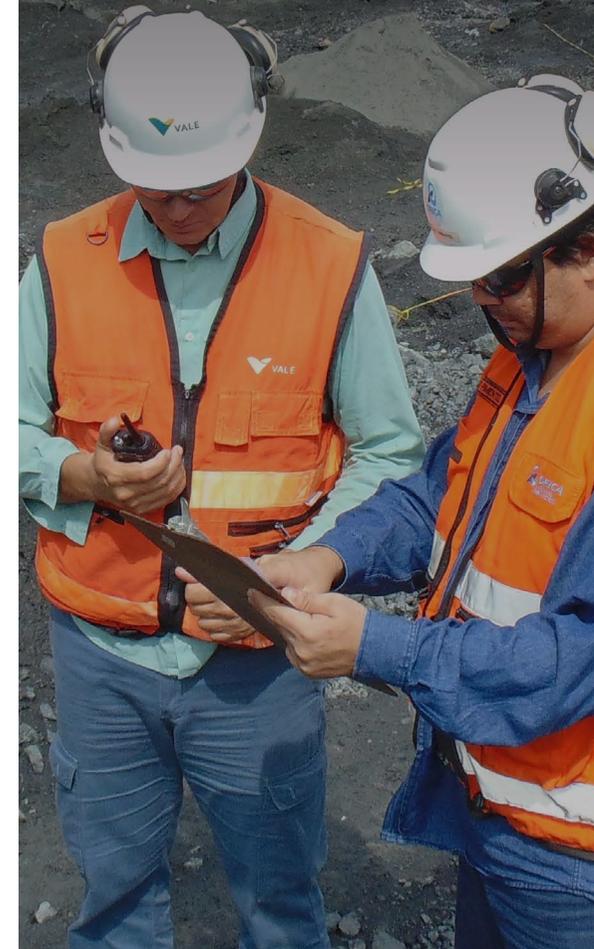
NEED HELP? ASK YOUR:

- manager or an Executive Committee member
 - Human Resources representative
 - member of our Legal team
 - member of our Internal Audit team
 - member of our Ethics and Compliance team.
- Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Procedure: Code of Business Conduct: Reporting and Investigations
- Whistleblower Policy

We aim to create an environment where everyone can report a concern or incident without fear of retaliation, victimisation or discrimination.



OUR CODE: QUICK TEST

If you are in doubt about a decision, course of action or whether to speak up, take our Business Conduct quick test.

Values

Does it fit with Our Charter?

Law

Is it legal?

Policy

Is it in line with our policies, standards and procedures?

Feel

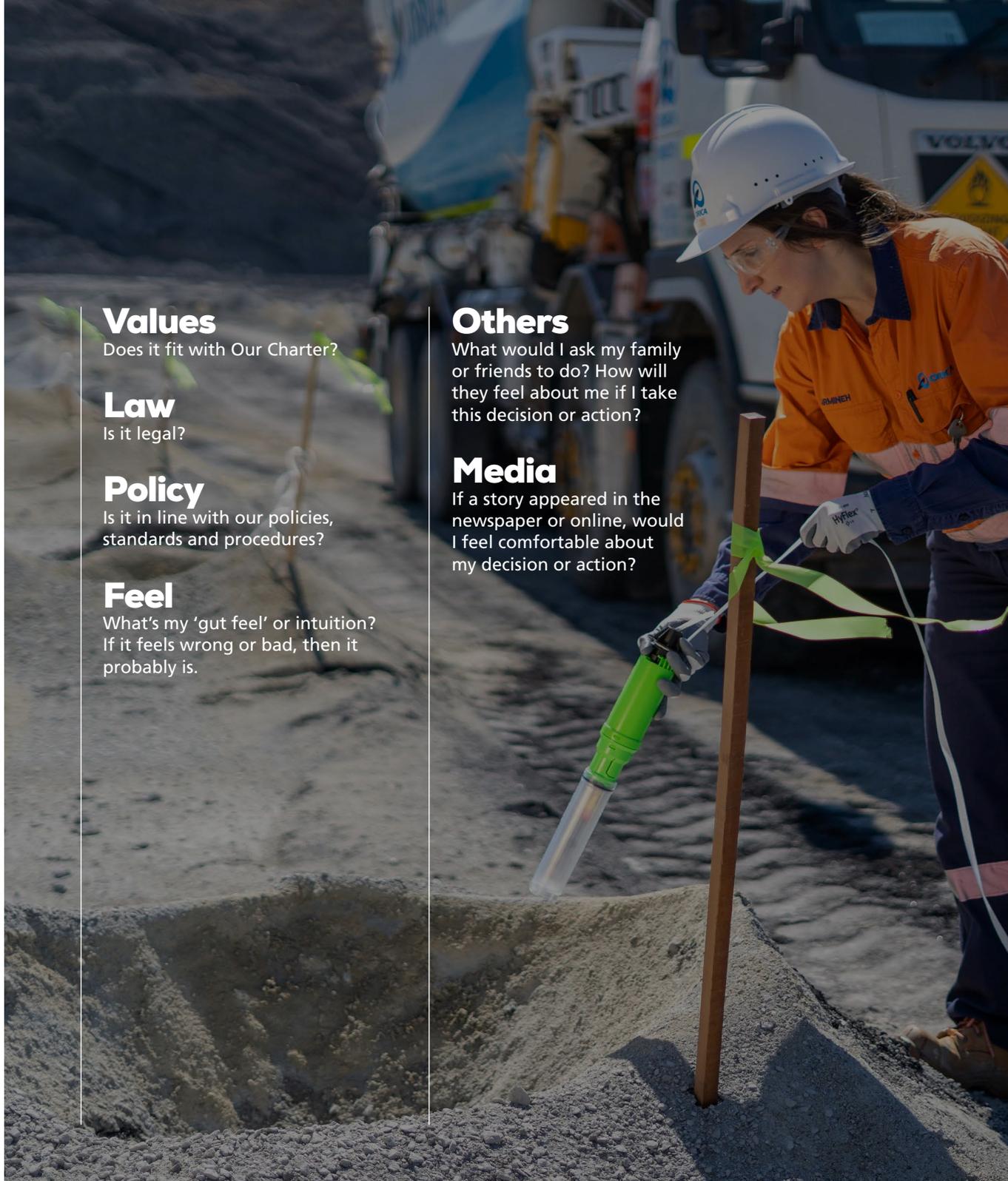
What's my 'gut feel' or intuition?
If it feels wrong or bad, then it probably is.

Others

What would I ask my family or friends to do? How will they feel about me if I take this decision or action?

Media

If a story appeared in the newspaper or online, would I feel comfortable about my decision or action?



OUR CODE: YOUR GUIDE

The way we act when working for, or on behalf of, Orica influences what our customers, communities, suppliers, governments, shareholders and our colleagues think of us. Our Code is our guide to doing the right thing. This guide summarises our expectations.



SAFETY IS OUR PRIORITY. ALWAYS.

FOLLOW SAFETY CONTROLS AND STOP UNSAFE WORK

- Always follow safe work procedures.
- Always stop work that is unsafe, including where a major hazard key control is not in place.
- Never ignore unsafe practices or behaviours.
- Always report a safety incident.

BE FIT AND ABLE TO WORK SAFELY

- Always travel safely and use any equipment and vehicles safely.
- Never come to work affected by alcohol or drugs.

ENSURE THE SECURITY OF OUR PEOPLE AND PRODUCTS, ALWAYS

- Always follow all controls for secure storage, handling, transportation and use of our products.
- Never ignore site security procedures.
- Never fail to report a security incident.



WE RESPECT AND VALUE ALL.

VALUE OTHERS AND RESPECT HUMAN RIGHTS

- Always be inclusive, treat everyone fairly and equally and always respect people's dignity and rights.
- Never discriminate against, harass, bully or vilify anyone – this extends to online, digital and virtual spaces.
- Avoid causing or contributing to human rights abuses and exploitation through our business activities and relationships.
- Always speak up if you see or experience inappropriate or concerning behaviours or actions by our people or by our third-party relationships such as suppliers, customers or business partners.

WORK WITH AND SUPPORT OUR COMMUNITIES

- Always seek to understand the impacts of our business decisions and activity on our communities, especially the most vulnerable, including women, children, minority groups and Indigenous communities.
- Always seek to build inclusive, trusted relationships and consider ways we can meaningfully contribute to the community.
- Never fail to act on and report any concern, complaint or incident that impacts or has the potential to impact the community.
- Always obtain approval for any major sponsorships or community investments and register all local sponsorships, donations or investments in accordance with Group Standard: Ethics and Compliance.
- Never make a political donation or contribution on behalf of Orica.
- Always stop work if you identify a risk to indigenous cultural heritage sites.

CARE FOR THE ENVIRONMENT

- Always make sure you know of potential environmental impacts and prevent loss of containment.
- Always report an environmental incident.
- Always look for opportunities to decrease carbon emissions, waste, potable water use, noise and other environmental impacts.



WE ACT WITH INTEGRITY.

COMPLY WITH TRADE CONTROLS

- Always follow procedures for onboarding customers and suppliers.
- Never trade, directly or indirectly, with a sanctioned entity or individual or with a sanctioned country without approval.

SAY NO TO BRIBERY AND CORRUPTION

- Always question any suspicious payments or suggestions from suppliers and partners.
- Never participate in any form of corruption or bribery, even if refusing will delay or disrupt our business.

PROTECT CONFIDENTIAL INFORMATION AND AVOID INSIDER TRADING

- Always report if you receive information that could impact our share price.
- Never provide market-sensitive information to any third party without authorisation.
- Only trade shares when allowed. Don't trade if you possess inside information.

PROTECT DATA PRIVACY

- Always safeguard personal information from loss, modification or disclosure.
- Never access, use or disclose personal information without a business need.

COMPETE ETHICALLY AND LAWFULLY

- Always ensure any cooperation arrangements with competitors are approved.
- Never share information about tender activities with competitors.

ACT ON CONFLICTS OF INTEREST

- Always be upfront about a potential conflict of interest and disclose any close personal relationships.
- Never improperly use your position for a personal advantage.

TAKE CARE WITH GIFTS AND HOSPITALITY

- Always refuse gifts or hospitality designed to influence a business decision.
- Never give or accept anything when a negotiation is underway.



WE ARE COMMITTED TO EXCELLENCE.

USE ASSETS OR RESOURCES WISELY AND MAINTAIN ACCURATE RECORDS

- Always act within your delegated authority.

PROTECT ASSETS, EQUIPMENT AND PROPERTY

- Always protect our property, equipment and assets from theft or damage, including intellectual property.
- Never leave equipment or assets unsecured or unattended.

PROTECT OUR INFORMATION SYSTEMS, NETWORKS AND DEVICES

- Always keep passwords secret and lock your computer.
- Never download unlicensed software on your Orica device or equipment.



TOGETHER WE SUCCEED.

SHARE KNOWLEDGE AND CHALLENGES TRANSPARENTLY WITH OUR TEAM

- Always listen to different points of view and raise concerns proactively.
- Never conceal information or act deliberately to prevent a colleague from succeeding.
- Always work as one team, no matter what part of the business you are in.

PARTNER WITH CUSTOMERS FOR A BETTER UNDERSTANDING AND RESULT

- Always listen to our customers, respond to their needs and act on issues promptly.
- Never fail to take corrective action on issues affecting our customers.



SAFETY IS OUR PRIORITY. ALWAYS.

**THE MOST IMPORTANT THING
IS THAT WE ALL RETURN HOME
SAFELY, EVERY DAY.**

We deliver this by expecting
our people to:

- Follow safety controls and stop unsafe work.
- Be fit and able to work safely.
- Ensure the security of our people and products, always.



FOLLOW SAFETY CONTROLS AND STOP UNSAFE WORK

Acting responsibly to protect your own safety and the safety of the people and communities you work with is the most important thing you do, every day. There are risks in our work, however by following safe operating practices and ensuring effective safety controls, we can prevent or mitigate hazards or other causes of potential harm.

? WHAT MUST YOU DO?

Be responsible for your own safety by knowing and following all operating and safe work procedures that apply to your role and location or make suggestions for improvements where there are safer ways of working. Remember to be mindful of any risks and stay focused on doing things safely. If you are a manager, you must be vigilant and ensure your people know what's required, and are capable, trained and empowered to act.

ALWAYS



- ✓ Stop any work that you feel is unsafe, and report it immediately
- ✓ Stop any work if a Major Hazard key control is not in place
- ✓ Follow safe work procedures
- ✓ Operate processes and equipment within safe operating limits
- ✓ Obtain and keep valid any related licences or certifications you require for your work

NEVER



- ✗ Fail to report a safety incident or act upon it
- ✗ Ignore unsafe practices or behaviours
- ✗ Take on tasks or use equipment which you have not been trained for
- ✗ Use equipment that is not fit for service
- ✗ Bypass or deactivate key controls without authorisation

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

Our Charter values say that safety is a priority, yet my manager tells us to break safety procedures to get the job done. What should I do?

Do not do anything that will breach safety procedures. Talk to your manager to check if safety procedures are being compromised. If you are uncomfortable raising it with your manager, report it to your SHES or Human Resources representatives or contact the Speak-Up service.

Our plant has just been upgraded to increase production capacity. The upgrade schedule was tight and I am aware some safety testing was dropped from the schedule. Should I do anything?

Yes! Never assume that something is safe, especially when you know that a procedure has not been followed. You are responsible for your own safety and that of others, so you must raise the incident with your manager, report it to your SHES or Human Resources representatives or contact the Speak-Up service.

I saw a colleague doing a task unsafely while on site. They are new and more senior than me so I felt uncomfortable saying anything. What should I do?

We are all responsible for our own safety and that of others. It should not matter if your colleague is more senior, tell them to stop, let them know it is not okay and if they don't stop the unsafe practice either raise it with your manager, report it to your SHES or Human Resources representatives or contact the Speak-Up service.

NEED HELP? ASK YOUR

- manager
- SHES representative
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Process Safety
- SHES Management system – Enblon



BE FIT AND ABLE TO WORK SAFELY

You are responsible for ensuring you present to work fit and able to work safely. Being aware and protecting yourself from physical harm while at work, including when traveling for work, means being prepared, taking precautions and using protective equipment when appropriate.

? WHAT MUST YOU DO?

Come to work in a condition where you are fit to perform work safely. In some roles, where permitted by applicable laws, you may also be required to participate in periodic medical assessments and fatigue management, and drug and alcohol and occupational hygiene monitoring programs. This is to ensure the safety of the workplace or to comply with the law. If you are taking medication, including prescribed medicine, know what effect it might have on you and advise your manager if necessary. When travelling, ensure you are prepared for potential risks to your health or safety.

ALWAYS



- ✓ Tell your manager if you are taking medication that could impact your ability to perform your work safely
- ✓ Be fit for work
- ✓ Be alert to health risks from noise, harmful agents and infectious diseases
- ✓ Understand and implement relevant health key controls

NEVER



- ✗ Come to work impaired (for example by alcohol, drugs or fatigue)
- ✗ Bring a weapon to work
- ✗ Smoke in areas where it is not allowed
- ✗ Work in or on plant or equipment that has not been properly decontaminated

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I drive a forklift at an Orica warehouse and am currently taking prescribed medication. My doctor advised me that this medication may make me drowsy. So far, I feel fine. Do I need to inform my supervisor?

Yes. It is a condition of your work that you provide us with this type of information, so we can assess if you are fit for work and able to perform your work safely. We will only use that information in a way permitted by law and to create a safe workplace for you and others. In consultation with your manager, alternate duties may be considered appropriate until your course of medication is complete.

I am really looking forward to drinks after work with the team at the end of the week. We have all been working hard and it will be a good opportunity to have some fun off-site. Is this okay?

Yes, it is okay to have drinks after work with your colleagues but remember to always act responsibly and be respectful and inclusive of others. If you have consumed any alcohol, you will also be unable to return to a work site or office after the event.

NEED HELP? ASK YOUR

- manager
- SHES representative
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Health
- SHES Management system – Enablon



ENSURE THE SECURITY OF OUR PEOPLE AND PRODUCTS, ALWAYS

The security of our people and products is of paramount importance for the safety of those working with us, the community and our customers. Identifying, maintaining and following controls is how we contribute every day to ensuring our people, plant, equipment, buildings, products and raw materials are secure.

? WHAT MUST YOU DO?

Follow all processes designed to control access, security and performance of Orica sites, buildings, equipment and vehicles. We also expect you to ensure that any controls relating to the handling, storage, transportation and use of our raw products are understood and always followed.

ALWAYS



- ✓ Follow all controls for secure storage, handling, transportation and use of Orica's raw materials and products
- ✓ Always report any concerns regarding the potential misuse of our product or instances where our product may be used to cause harm to people or the environment
- ✓ Obtain and keep valid any security related licences you require for your work

NEVER



- ✗ Fail to report a security incident in Enablon or act upon it
- ✗ Ignore site security procedures
- ✗ Fail to follow the right protocols to ensure our assets are secure

QUESTION AND ANSWER

A quick scenario to help you on your way.

A local security company is contracted to implement site security where I work. We've used the same company for many years and they know our business well. Lately however, I've noticed they are leaving the boom gate open. I don't think this is right so what should I do?

In this instance, report the situation to your manager or SHES representative. Security controls must always be followed as short-cuts can increase the risk of unauthorised entry and theft. Contracted security companies should be assessed every three years and a fixed asset security assessment completed regularly to ensure all security risks are identified and the right controls are in place.

NEED HELP? ASK YOUR

- manager
- SHES representative
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Physical Security
- Group Standard: Asset Lifecycle Management
- SHES Management system – Enablon



WE RESPECT AND VALUE ALL.

OUR CARE FOR EACH OTHER, OUR CUSTOMERS, SUPPLIERS, PARTNERS, COMMUNITIES AND THE ENVIRONMENT HELPS TO BUILD POSITIVE AND TRUSTED RELATIONSHIPS.

We deliver this by expecting our people to:

- Value others and respect human rights.
- Work with and support our communities.
- Care for the environment.



VALUE OTHERS AND RESPECT HUMAN RIGHTS

Respecting the rights of others and supporting equal opportunity is a core part of who we are at Orica. We are united by Our Charter values and celebrate our unique differences. As a member of our diverse community, we expect you to contribute to an inclusive, collaborative, positive and healthy environment in which we can all succeed. Discrimination and harassment are explicitly prohibited. Exclusionary behaviours and language – regardless of whether they rise to the level of harassment – are also unacceptable.

Orica is committed to building a responsible and inclusive culture that respects the rights of our global workforce and those impacted by our operations and business relationships in the communities in which we operate.

? WHAT MUST YOU DO?

Be inclusive and treat everyone fairly and equally. Always respect people’s dignity and rights, especially those considered vulnerable such as women, children, minority groups and Indigenous Peoples, whether it be in our workplace or communities.

Ensure any actions taken or decisions made on behalf of Orica are free from discrimination, harassment, bullying, vilification or any unacceptable behaviour. Disciplinary action, up to and including dismissal or termination of contract, can be taken against someone who takes part in this type of behaviour. This means:

- **It is never acceptable to discriminate and treat someone less favourably** because of their age, sex, gender identity or intersex status, race, colour, nationality or ethnicity, social origin, marital, relationship, pregnancy or carer status, physical or mental disability, religion or political opinion, sexual preference, trade union activity, or some other characteristic. The basis for appointment, advancement, performance appraisal and remuneration within Orica is competence, performance and behaviour in line with Orica’s values.
- **It does not matter what you intended**, harassment is an act that is unwelcome, offensive, humiliating or intimidating. This includes sexual harassment which occurs when a person engages in unwelcome conduct of a sexual nature, including an unwelcome sexual advance or an unwelcome request for sexual favours.
- **Bullying is unacceptable** and includes behaving in a way that is unreasonable, persistent or repeated, demeaning, undermining or humiliating, and which puts someone’s safety and health (including mental health) at risk. This does not include reasonable performance direction or feedback.

- **We will not tolerate behaviour that publicly vilifies and encourages hatred, contempt or severe ridicule** for a person or a group. If it contains threats of physical harm toward someone or their property, it can also be a criminal offence. This includes posts made on social media.

Avoid causing or contributing to human rights abuses and exploitation through our business decisions, activities and relationships. When engaging with a supplier, contracting with another party or hiring labour, take steps to ensure that any third party meets our requirements and shares our commitment to human rights (including the rights of Indigenous Peoples and their cultural heritage), decent work conditions and the prevention of modern slavery (including child labour, forced labour, indentured labour or any form of human trafficking). Where appropriate, leverage our influence with our existing third-party relationships to address any identified gaps against our expectations.

ALWAYS 	NEVER 
<ul style="list-style-type: none"> ✓ Act professionally and respectfully when interacting with colleagues, customers, suppliers, business partners and the community ✓ Be open to diverse views and opinions from people with different social identities and experiences ✓ Adopt language, tones, actions, behaviours and body language that are inclusive and productive for all parties ✓ Do your due diligence on any third parties to ensure they align with our expectations on human rights and decent work ✓ Speak up if you see or experience inappropriate behaviour in the workplace or by our third-party relationships, including any discriminatory, unsafe, exploitative or illegal behaviours and activities 	<ul style="list-style-type: none"> ✗ Discriminate against, harass or bully anyone ✗ Engage in a public act that vilifies or incites hatred ✗ Distribute derogatory material or photos or fail to report it if you are the recipient ✗ Behave in a way that offends, intimidates, degrades, insults or humiliates others, including making jokes at someone’s expense or interfering with their belongings or equipment ✗ Cause or contribute to human rights abuses and exploitation through our business decisions, activities relationships ✗ Prevent employees’ right to negotiate terms and conditions of employment, individually or collectively ✗ Force employees to join or prevent them from joining a legally recognised trade union or third-party representative organisation



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I recently applied for a new sales position for which I am well qualified, however a less qualified colleague was appointed. I was told it was because they preferred to appoint a male because the customer base is predominantly male and I would be a poor cultural fit. What should I do?

All our talent management processes must be applied in a transparent and fair manner across Orica including an equitable recruitment and selection approach. Decisions based on personal attributes may amount to discrimination. You should raise the incident with your Human Resources representative or with the Speak-Up service.

A colleague in my area is constantly teased about his religious beliefs. It is his problem so do I need to do anything?

Yes. This is harassment and not acceptable behaviour. You should report what you have seen to your manager, your Human Resources representative or the Speak-Up service.

My manager keeps moving my deadlines and deliverables causing me to work long hours. In team meetings, they ignore me or dismiss my contribution in front of others. Last week, they put me on a formal performance plan which has left me feeling really stressed. What should I do?

If you feel comfortable doing so, you should raise your concerns with your manager in the first instance. If you are not comfortable speaking to your manager or the discussion does not resolve the situation, speak to your two-up manager, a Human Resources representative or the Speak-Up service.

My supervisor has been making sexually suggestive comments about my appearance or clothing, and sometimes touches my shoulder or arm when we are having a one-on-one discussion. It makes me uncomfortable and I'm not sure what to do about it.

This is sexual harassment and unacceptable behaviour. Raise your concerns with your two-up manager if you feel comfortable doing so. If you are not comfortable doing this, speak with a Human Resources representative or to the Speak-Up service.

I am working on a site and there are several 'attached' workers being used. Is this forced labour and what should I do?

You should never use 'attached' workers. In some countries, bonded workers, who are often referred to as 'attached' workers, have no freedom to walk away and are not paid for their work. This means they are being used as forced labour which is a form of modern slavery. Immediately report the situation to a member of Orica's Legal team, Group Sustainability representative or report through the Speak Up service.

We use a company to supply components for one of our factories. I have heard that some workers are very young and have had their identity papers taken from them. Is this our problem or the supplier's problem?

What our suppliers do, how they behave and their adherence to laws is a serious matter for Orica. Employing children or young workers and forcing people to work by taking their identification papers is a breach of the International Labour Organisation (ILO) conventions and a form of modern slavery. Never engage suppliers who do not protect human rights in their workplace. If you suspect such a situation exists, speak to a member of Orica's Legal team or a Group Sustainability representative or report through the Speak Up service.

I have been sourcing services and noticed that one of the potential suppliers has not confirmed their human rights policies align with Orica's or that they do not employ child labour. Can I engage this supplier?

No, you should not proceed with engaging the supplier without undertaking additional due diligence. This is a 'red flag' that the supplier does not comply with Orica's Group Standard: Procurement. If such a situation arises, speak to a member of Orica's Legal team or a Group Sustainability representative or report through the Speak Up service.

We have been approached by a potential customer to bid for a contract that will be significant in contributing to our regional sales target. However, there is concern on one of the mining sites that the Traditional Owners have not given appropriate consent. Can we still bid for the contract?

Confirming free, prior and informed consent by Traditional Owners or authorised Indigenous groups is essential. Before proceeding with this bid, speak to your manager or report using the Speak-Up service.

NEED HELP? ASK YOUR

- manager
- Human Resources representative
- Group Sustainability representative
- Ethics and Compliance representative
- member of Orica's Legal team.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Sustainability, Government and Community Relations
- Group Standard: Human Resources
- Policy: Human Rights at Work
- Policy: Diversity and Inclusion
- Group Standard: Procurement



WORK WITH AND SUPPORT OUR COMMUNITIES

Developing strong, trusted relationships with our community stakeholders (including local government) is vital for the success of our business and fundamental to securing our licence to operate. This means adopting an inclusive, respectful and responsive approach to community engagement, minimising our negative impacts on our host communities, and actively looking for opportunities to deliver meaningful and long-lasting economic and social outcomes.

? WHAT MUST YOU DO?

Build strong and trusted relationships with our communities. Look for ways to minimise any negative impacts and identify opportunities where we can contribute positively including local procurement, sponsorships, community investment and donations to impactful charities.

Orica supports local communities and contributes by sponsoring local events and groups, making community investments, and donating to charitable causes. However, although we support our local communities, we are impartial to politics and will not contribute funds or in-kind support to any political party, politician, elected official or candidate for public office.

We consider the circumstances for all sponsorships, donations or community investments to ensure our funding benefits the intended recipients and aligns with our values. We will never provide any contribution or support to reward or influence anyone to perform their work duties improperly or to give Orica an improper business advantage. All industry memberships must be approved.

Register all local sponsorships, donations or investments in accordance with Group Standard: Ethics and Compliance in the [Ethics and Compliance System](#). If it is a major sponsorship, seek approval from Group Government Relations and Community. If you are approving advertising and use of the Orica brand, ensure it complies with our guidelines and protects our rights, standing and reputation.

ALWAYS



- ✓ Immediately report any community or environment incidents that may impact the community
- ✓ Stop any work that you feel is potentially damaging to culturally sensitive Indigenous sites and report it immediately
- ✓ Be inclusive, respectful and responsive when engaging our communities, including when receiving concerns or complaints
- ✓ Understand our impacts on local communities and always respect their basic rights, including acknowledgement and respect of Indigenous Peoples, their cultural heritage and unique connection to Country
- ✓ Show sensitivity to vulnerable community members such as women, children and minority groups
- ✓ Look for ways we can contribute positively to the community including sponsoring local events and groups, making community investments or donating to charitable causes
- ✓ Obtain approval for any major sponsorships or community investments, use of Orica's brand, or membership of any regional or country industry association in line with Group Standards

NEVER



- ✗ Fail to act upon or report a community or an environmental incident
- ✗ Prevent the reporting of community concerns or minimise reports of an incident
- ✗ Engage with government officials or enter Orica into any regional/country industry associations or memberships without relevant approvals
- ✗ Use a sponsorship, donation or community investment to benefit any political party, a government official or community leader (directly or through a third party) to influence or reward their actions
- ✗ Use the Orica brand for external partnerships or sponsorships without prior approval



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

There has been some discussion that an Indigenous cultural heritage site is at risk of being destroyed by our blasting activity. What do I do?

Immediately stop work on the site and report it to your supervisor, manager or to the Speak-Up service. Before proceeding with any blasting activity, we must ensure there is Free, Prior, Informed Consent (FPIC) given by the impacted and authorised Indigenous groups.

I live locally and when people hear I work for Orica, the response is usually negative, especially in relation to how noisy the plant is. What can I do with this feedback, if anything?

Local employees can play a significant role in ensuring the sustainability and success of our operations. If your site has someone in a community engagement role, pass on any feedback you feel is noteworthy or becoming a 'common theme'. If not, tell your site lead or manager as they may be able to help you with some talking points, so you feel more comfortable in these interactions.

Sometimes I attend social and community events straight after work and I am in my Orica work shirt. Is that okay?

As a member of the Orica team, the way you behave in the community can reflect on all of us. Wearing your Orica work shirt can also prompt others to share their feedback about Orica. If that happens, make sure you pass the information to the right person who can act on it.

Our local government is organising its annual marathon and a government official has asked if Orica can donate the event prize money in exchange for our logo being displayed on signs throughout the event. The government official has asked that we make the relevant payment to a company called 'Marathon Organising Committee'. Should I proceed?

No. Any situation where a government official requests that Orica sponsor or donate to a cause should be treated with caution, especially if the official is requesting that the donation be paid to a third party. Notify your Regional Ethics and Compliance representative to seek advice before committing to any such request.

The local police force in my country has requested that Orica donates some damaged and/or obsolete products to assist in the training of explosives detection dogs. Do I need approval for this given the relevant goods were destined for disposal anyway?

Yes. Consult with your local SHES / Regulatory Affairs representative to understand Orica's obligations regarding product security and use by third parties in this scenario. Non-monetary donations and/or the provision of items 'in kind' can also present a corruption risk, as perceptions of the value of an item can differ between parties. As per the Group Standard: Ethics and Compliance, the Ethics and Compliance team must be notified of any non-monetary donation requests.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- Government Relations and Community representative
- member of Orica's Legal team.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Sustainability, Government and Community Relations
- Group Standard: Ethics and Compliance
- SHES Management system – Enablon



CARE FOR THE ENVIRONMENT

We care about the environment and take our environmental responsibilities seriously. It is important to understand how our activities impact the environment and use the right controls to mitigate risks to operating in a sustainable and responsible way. Excellence in environmental management and performance is essential to our ongoing business success.

? WHAT MUST YOU DO?

Ensure you understand our environmental responsibilities and obligations. Take time to identify activities that could have an impact on the environment, including loss of product. Prevent spills occurring and safely clean up any product, raw material or chemical loss immediately. If you see something wrong, stop and immediately act on it. If you suspect there could be an environmental incident, talk to your manager or a SHES representative.

ALWAYS ✓

- ✓ Make sure you know of any potential environmental hazards and control them effectively
- ✓ Implement and maintain environmental key controls
- ✓ Stop any work that may have an unintended impact on the environment
- ✓ Look for ways we can reduce our emissions and minimise our negative impacts on the environment

NEVER ✗

- ✗ Fail to report an environmental incident
- ✗ Ignore contaminating the environment
- ✗ Disregard environmental key controls that mitigate our environmental risks

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I can see something on the ground which could be a chemical or contamination. Should I say anything or do anything about it?

Yes. If you see any product, chemical or raw material outside fit-for-purpose plant and equipment, clean it up and report it to prevent it from occurring in the future. If there is a loss of containment or spill, this should be safely stopped, the runoff contained, and the impacted area cleaned and remediated.

I'm completing a task in the plant and am not sure if the environmental controls in place are working effectively. What do I do?

Stop the task if it is safe to do so and with relevant site personnel, review the controls to determine if the controls are working effectively. Our environmental controls are there to protect the environment and to help us meet our regulatory commitments, so it is important they are always working effectively.

I am aware of some process improvements we could include on our plant to prevent contamination, but I think they may be expensive. Are they worth raising?

Yes. Your ideas are worth raising even if they may be expensive or complex. We are committed to caring for the environment and it is important to consider new ideas or opportunities.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- Government Relations and Community representative
- member of Orica's Legal team.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Environment
- SHES Management system – Enablon



TOGETHER WE SUCCEED.

**COLLABORATION MAKES US
BETTER, INDIVIDUALLY AND
COLLECTIVELY.**

We deliver this by expecting
our people to:

- Share knowledge and challenges transparently with our team.
- Partner with customers for a better understanding and result.





SHARE KNOWLEDGE AND CHALLENGES TRANSPARENTLY WITH OUR TEAM

We believe that collaboration makes us better. We succeed when we are open, honest and transparent in our communication with each other, sharing information, insight, ideas and advice freely. We freely share bad news as much as good news so that tough situations can be dealt with as quickly as possible. We are a team and take accountability and responsibility for our team's performance.

? WHAT MUST YOU DO?

Work together with your colleagues as one team, no matter what part of the business they come from because together we are stronger. Share information freely with your colleagues to enable collaboration and success in achieving our objectives.

Be clear about expected roles and responsibilities, and any constraints that might limit your ability to perform them. Take advantage of Orica's various communication channels to exchange ideas, expertise, lessons learnt and resources with colleagues, or when a problem arises, to report it.

ALWAYS



- ✓ Listen to and respect different points of view expressed at work
- ✓ Raise any questions, challenges, misunderstandings or problems with your manager early to ensure these are addressed promptly and appropriately
- ✓ Respond to questions and issues promptly
- ✓ Work as one Orica team, no matter what part of the business you are in

NEVER



- ✗ Conceal information from colleagues, your manager, internal or external auditors
- ✗ Act deliberately in a way that causes a colleague or another part of the business to fail to meet their objectives

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I rely on another part of Orica to provide me with support in my work. Lately they've been falling behind and when I contacted them, they say they're busy with their own work and I'm at the end of the queue for help. Is this a Code of Business Conduct matter?

Usually, situations like this can be resolved by working with colleagues to understand timeframes and priorities, agree service levels and resolve any issues such as resource or budget constraints. However, actively seeking to prevent a colleague or another part of Orica from succeeding is a serious matter and a breach of Our Code. You should discuss your concerns with your colleagues and if unsuccessful, raise the concern with your manager or a Human Resources representative.

I am responsible for managing a project and we are falling behind the planned schedule. I have been asked by the project director to ignore this and report we're on track. Given my team's bonuses may be impacted, what should I do?

Falsifying results is a serious matter and a breach of Our Code so ensure all reporting is complete and accurate. Discuss your concerns with the project director and seek to identify other ways to get the project back on track. If this is not possible or successful, raise the concern with your manager, a Human Resources representative or the Speak-Up service.

I'm in a Regional team and aware of a possible Code of Business Conduct breach. However, I've been asked to keep track of it in region rather than report it to Group as per the procedure. My manager says we can handle it ourselves quicker and better. What should I do?

As certain breaches of Our Code (defined in the Group Procedure) could have an Orica-wide legal, regulatory or reputational impact, these need to be reported at a Group level and managed appropriately. Deliberately not reporting concerns as per the procedure is a breach of Our Code. You should discuss this issue with your manager. If this is not possible or successful, raise the concern with your Human Resources representative or a member of Orica's Legal team, Internal Audit or the Speak-Up service.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- Government Relations and Community representative
- member of Orica's Legal team.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Procedure: Code of Business Conduct: Reporting and Investigations



PARTNER WITH CUSTOMERS FOR A BETTER UNDERSTANDING AND RESULT

Orica is a trusted partner of choice for our customers. That means we partner with our customers to identify the best solutions for their needs and together, we act to deliver on those needs as promised. Our people are experts in their field using their skills and experience to make a real difference to our customers.

We establish and maintain minimum performance requirements Orica-wide to ensure we act in the best interests of our customers and provide quality products, services and solutions. We listen to our customers, identifying opportunities for them and responding to performance issues promptly. When issues occur, we keep lines of communication open, act transparently and involve our customers until we achieve a satisfactory resolution.

Our Voice of the Customer (VOC) program ensures we are constantly delivering on our customer promise by measuring the customer perception of Orica and collecting candid feedback to help serve our customers better. The program is underpinned by the principle of transparency. We are committed to listening to our customers' feedback, learning from it and responding appropriately.

? WHAT MUST YOU DO?

Be proactive, listen to our customers and respond appropriately to ensure we continue to improve and satisfy our customers' needs. If there are issues, implement and track corrective and proactive actions to resolve and/or improve specific product or service performance issues or opportunities. Always use approved systems and processes for these activities and for reporting on our performance. Ensure customers are engaged and communication is frequent, informative and continuous until the resolution of any matters.

ALWAYS



- ✓ Perform your duties diligently and provide services that meet contractual requirements
- ✓ Listen to customers, respond to their needs and act on issues or opportunities promptly
- ✓ Ensure that customer information is captured, updated and maintained
- ✓ Record any customer performance feedback diligently and follow through on what we say we will do
- ✓ Present a professional image through conduct and dress and abide by any 'house rules' on customer sites

NEVER



- ✗ Fail to take corrective action on an issue affecting a customer
- ✗ Ignore any risks to the performance of our products, services or solutions
- ✗ Forget to manage all changes involved with product and/or service cases in the appropriate system



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I have moved into a new team and taken over a long-term customer account. I noticed there doesn't appear to be a lot of information about the customer in our system. As they are an old customer, should I add them into the system?

Yes. All customers must have an account and engagement plan, with their details in the Cloud for Customer (C4C) system. This will help ensure their continuing needs are being satisfied, any issues are quickly addressed, and we continue to build strong partnerships with them.

What should I do if a customer informs me of product or service performance issues?

Always act on any communicated concerns to ensure we can respond, investigate and allow corrective actions to be taken quickly. Engage the correct teams and stakeholders and use the approved systems. If this issue could have a health, safety, environment or security impact, act in accordance with the relevant SHES Group Standards. Our Case Management process allows everyone in Orica to enter a product or service performance issue in C4C using the Quick Links on the Globe.

If an issue is reported about one of our products by a customer, who is responsible for ensuring they are aware of the resolution?

For every type of performance issue, a single point of accountability for resolution of the specific case, and for communicating to the customer, is appointed. That person is responsible for ensuring the customer is kept up to date and all feedback is captured until the case is satisfactorily resolved.

NEED HELP? ASK YOUR

- manager
- In region commercial representative
- Marketing manager
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Customer Management and Sales Excellence
- Group Standard: Product and Service Performance and Opportunity Management





WE ACT WITH **INTEGRITY.**

**WE ARE OPEN, HONEST AND
WE DO WHAT IS RIGHT.**

We deliver this by expecting our people to:

- Comply with trade controls.
- Say no to bribery and corruption.
- Protect confidential information and avoid insider trading.
- Protect privacy.
- Compete ethically and lawfully.
- Act on conflicts of interest.
- Take care with gifts and hospitality, donations, sponsorships and community investments.



COMPLY WITH TRADE CONTROLS

Orica is subject to international trade control laws including trade sanctions and export control laws. Trade sanctions are laws which prohibit the direct and indirect trade with certain individuals, entities and countries. Direct and indirect sales to some countries require us to obtain specific government permits. Export control laws restrict our ability to export certain products and technology from the United States, Canada, the European Union, the People's Republic of China and Australia without first obtaining permits from relevant authorities.

All trade control laws are intended to implement the foreign policy and national security objectives of our host governments, including the prevention of terrorism. Any transactions in breach of these laws may constitute a criminal offence, for you as an individual, and for Orica. It could also create serious risks to public security and harm our relations with host governments and our license to operate.

? WHAT MUST YOU DO?

To avoid breaching any trade control laws you must ensure any counterparties, suppliers or customers are onboarded appropriately, screened and validated through due diligence. If you work with counterparties who have operations in sanctioned countries, ensure you are familiar with the requirements contained in the Group Standard: Ethics and Compliance.

If you are involved in exporting from countries such as the United States, Canada, the European Union, the People's Republic of China and Australia, or if you export goods from anywhere which contain United States origin content or technology, you must be familiar with export licensing requirements.

ALWAYS



- ✓ Follow onboarding procedures for all suppliers and customers
- ✓ Ensure you are familiar with export licencing requirements before exporting products
- ✓ Ensure you have the right permits and licences to move products

NEVER



- ✗ Engage in discussions, negotiations or trading directly or indirectly (through a third party) with a sanctioned country, entity or individual without checking first
- ✗ Participate in, or agree to, a transaction that conceals the identity of a supplier or customer

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I have received an inquiry from a potential new Orica customer in Switzerland. The customer is reluctant to provide information in relation to its shareholders which I understand are needed to enable the sanctions screening checks to be completed. The customer has indicated that if we can avoid the need for them to disclose their shareholders, they will likely submit some large orders for Orica products. What should I do?

This is a red flag and should be reported to the Ethics and Compliance team. We are unable to onboard a new customer without completing the sanctions screening checks that are mandated under the Group Standard: Ethics and Compliance. For example, Russia is subject to specific trade sanctions. For customers in sanctioned countries, it is a mandatory requirement for the customer's name to be screened but also the directors, officers and shareholders. This ensures we properly assess and manage the risk of Orica products being sold to sanctioned entities and/or individuals and ensure compliance with applicable trade sanctions laws.

I have been asked to ship surplus raw materials which were purchased from a supplier in the USA to an Orica operation in another country. Do I need to seek any additional licences?

Products that are of US origin, or which incorporate US content, technology or software may require a licence from the US before being exported (even if being exported from a country outside the US). You should check US export licencing requirements before shipping any US origin products to another country. Contact Ethics & Compliance or Distribution for assistance.

I am a US citizen and I have been requested by one of our external distributors to coordinate a new business opportunity in Cuba. Are there any restrictions on selling Orica products into Cuba?

Cuba is still the subject of comprehensive US sanctions which prevent you, as a US citizen, from being directly involved in any transactions. Due to these comprehensive sanctions, you are required under the Group Standard: Ethics and Compliance to obtain approval from the Ethics and Compliance Manager for your region before undertaking any transactions involving the supply of Orica products into a Sanctioned Country, such as Cuba. You should immediately cease any further involvement with this proposal and contact your Regional Ethics and Compliance Manager for advice.

NEED HELP? ASK YOUR

- manager
 - Ethics and Compliance representative
 - member of Orica's Legal team
 - Global or Regional Supply Chain representative.
- Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Ethics and Compliance
- Group Standard: Logistics and Distribution
- Group Standard: Procurement
- Orica Ethics and Compliance System
- Orica Glossary



SAY NO TO BRIBERY AND CORRUPTION

Operating with integrity means we will never offer, promise, give, or approve anything of value to improperly or illegally influence a decision by a government official, to win business, in order to achieve a business advantage. Refusing to participate in bribery or corruption may sometimes cause delays or difficulties, but we will never compromise our value of integrity to achieve a business outcome.

Giving or receiving any corrupt payments or other value items - including bribes, kickbacks, low value payments to expedite a routine task or service, secret commissions, offers of employment or offers of contracts for services - is wrong and against the law.

This also applies to our suppliers and we take steps to ensure that third parties who interact with others on our behalf, understand and live up to our commitment to integrity. Regardless of who makes the payment, Orica and anyone involved could be subject to criminal penalties, fines or imprisonment. Our valued relationships with customers and host governments could also be damaged.



WHAT MUST YOU DO?

If you ever feel pressured to participate in bribery or corrupt activity you must resist and speak up. Always question any suspicious payments or suggestions, even if they are made or suggested by, or through, a partner or third party. Always seek advice from Ethics and Compliance.

If you are likely to face situations where you might be asked to make a suspicious payment, prepare yourself with strategies to help you respond. This could include explaining that you could lose your job at Orica for making an undocumented payment, asking to speak to a more senior official, insisting on an official receipt for any payment, or stating you need to seek advice from someone in Orica. If you are forced to make a payment because of an immediate risk to your safety, or a colleague's safety, then you may do so, however you must report without delay to your manager and through the Ethics and Compliance system.

If you become aware of any actual or suspected bribe from or to an Orica employee, or a request for a bribe from or to an Orica employee, you must report this as soon as possible via the [Ethics and Compliance System](#) or the Speak Up service.

ALWAYS



- ✓ Question any suspicious payments or suggestions from suppliers and partners
- ✓ Follow the correct process in our Group Standard: Ethics and Compliance when engaging a business partner
- ✓ Report without delay if you are forced to make a payment because of immediate safety risks

NEVER



- ✗ Participate in any form of corruption or bribery
- ✗ Offer promise, give, approve or provide anything of value, directly or otherwise, to a government official to influence their decisions relating to Orica
- ✗ Ignore something you think is unethical or suspicious



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I am currently engaged in negotiations with a new customer from a high corruption risk country. At a recent meeting, a representative of the customer discreetly informed me that in order to secure the contract, we will need to appoint his recommended sales agent. Following the meeting, I received an email from the customer representative confirming the name of the sales agent and suggesting that to win the contract, we need to pay the agent US\$50,000 per month for the duration of the contract. We have no need for a sales agent in this market and I have never met the sales agent being proposed. Is this a potential bribe? What should I do?

You are right to be suspicious as it appears this may be an attempt to elicit a bribe from the company in return for which the customer representative will award the contract to Orica. Providing a financial or other benefit directly or indirectly through a third party with the intention to improperly influence the award of a contract is illegal. You, as well as Orica, risk criminal prosecution if you proceed as suggested by the customer representative. You should report this request to your manager and submit a report to the Ethics and Compliance team via the Ethics and Compliance System which you can access via the Globe.

While travelling on business for Orica, I was stopped by an immigration official at the airport and advised I needed to go to a room in the airport to receive a Covid-19 vaccination. I informed the officer that I was fully vaccinated, however he insisted that I receive an additional injection. When I reached the room, I questioned the officer again as it was not clear what was in the needle they were threatening to inject into my arm. The officer said I could pay him \$50 to avoid the injection. I paid the officer as I was concerned for my safety. I am now concerned that I may have paid a bribe. What should I do?

This is not a bribe. This sounds like a duress payment rather than bribery as it appears to have been an attempt to put you in a position of danger to extort a payment of \$50 from you. Where you legitimately believe that you, your family or your colleagues' safety may be at imminent risk if you do not make the payment, you should pay the money to ensure your safety. Then notify the Ethics and Compliance team via the Ethics and Compliance System as soon as possible.

I am in the process of negotiating a new contract with one of our largest vendors for the region. We are entering the final stages of the contract review and hoping to agree on the vendor's prices next week. Over the weekend, I received an email to my personal email account from the owner of the proposed vendor company in which she offered her ski chalet for my next family holiday if I agreed to the prices she proposed in the contract. What should I do?

This is a bribe. The offer for you and your family to use her ski chalet in return for you agreeing to the vendor's prices in the contract is a direct attempt to influence your decision improperly. If you accept this offer, you would be committing a criminal offence which would expose you and Orica to the risk of criminal prosecution. You should report the offer to your manager and to the Ethics and Compliance team via the Ethics and Compliance System and wait for advice as to how to respond to the vendor. It is also likely you would need to excuse yourself from involvement in contract discussions going forward to ensure there is no inference that your actions were unduly influenced by this offer.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- member of Orica's Legal team.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Ethics and Compliance
- Orica Ethics and Compliance System



PROTECT CONFIDENTIAL INFORMATION AND AVOID INSIDER TRADING

Information and data stored on Orica's systems cannot be disclosed externally unless it is already publicly available or covered by an agreement with those receiving it. Product specifications and locations, pricing, vendor lists, sales or operational details, including the same details about customers, is proprietary information and must only be shared with authorised people with approval. As a publicly listed company, Orica must keep the stock market fully informed of any information that may have a material effect on the price or value of our shares. When working for Orica, you may sometimes have access to price sensitive information that is not publicly available ('inside information'). Using inside information when trading Orica shares is called insider trading and is against the law.

? WHAT MUST YOU DO?

Take appropriate care to protect Orica's information from loss or unauthorised access or disclosure. Confidential or proprietary information should be treated with extra care. If you become aware of any information that could impact the value of Orica's shares, inform your manager and the Company Secretary immediately, and do not trade Orica shares. If you are approached by the media or investment community, refer them to an authorised spokesperson.

ALWAYS



- ✓ Immediately report if you receive information that could impact Orica's share price
- ✓ Take care to protect confidential or proprietary information and be careful not to disclose it
- ✓ Get approval before making a statement about us in traditional media or online
- ✓ Trade Orica shares only when allowed

NEVER



- ✗ Use or disclose our information for personal gain or any illegitimate purpose
- ✗ Provide any confidential or sensitive information to a third party without approval and a contract
- ✗ Post photos or make remarks on social media about confidential matters, secure locations or information that is proprietary
- ✗ Trade Orica shares if you possess non-public price sensitive information or during 'blackout' periods





QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I am proud of my work and enjoy talking about Orica's achievements with my friends and family. A friend wants to buy some Orica shares. Can I tell them what I am working on?

It is not a problem if you only reveal information you are confident has already been made public. Information is public when it has been disclosed by Orica in public documents such as the Annual Report and on our website. You must not disclose information that is not publicly available, or which could impact the price or value of our shares.

I have been involved in a project that is developing wireless blasting technology and this was recently featured in a trade magazine editorial. Can I talk to my friends in the industry about it?

The project can be discussed as it has been disclosed publicly through the magazine. You can also 'like' or 'share' the article on your social media but take care to ensure you don't disclose further information that hasn't been disclosed, including any proprietary information.

I am proud of Orica and the work my colleagues are doing. Can I share details on social media?

Yes, you can share information about your work on social media but only if it does not include confidential, proprietary or market sensitive information which is not already publicly available. If you are making personal observations about Orica on social media, you should also be careful that you do not represent your views as being those of Orica unless you have received proper approval. If you are not sure whether your post would include any of this information, ask your manager.

I have been asked to present at a public forum in my community on behalf of Orica. Am I allowed to do this?

You may be allowed to do this but before you say yes, you must check our Group Standard: Corporate Affairs and Brand, Government and Community Relations.

I have worked at Orica for two years in Human Resources and have lately been working on an acquisition of another company. I would like to invest in shares. Can I do this without breaking 'insider trading' laws?

If you are using non-public information or 'inside information' to inform your decision to buy, it is considered insider trading. Doing so is unethical, unfair to other investors who don't have access to that information, and in many countries is also prohibited by law.

NEED HELP? ASK YOUR

- manager
 - Company Secretary
 - Corporate Affairs or member of Orica's Legal team
 - Investor Relations team
 - Human Resources representative.
- Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Policy and Group Standard: Market Disclosure and Investor Communications
- Policy and Group Standard: Securities Dealing
- Group Standard: Corporate Affairs and Brand, Government and Community Relations
- Group Standard: Physical Security



PROTECT DATA PRIVACY

Orica is a global business made up of many entities. As we go about our business, we come into possession of information about employees or external stakeholders such as customers and suppliers. Orica respects and is committed to protecting the privacy of all individuals and complying with the law, and ensuring that the management of employee information balances the individual's right to privacy with legitimate business needs.

We only collect, hold, use and disclose employee or third-party information when it is necessary for a business purpose (such as paying employees). We hold this information while the collection purpose remains and if it is needed to defend any legal claims.

? WHAT MUST YOU DO?

You must comply with Our Code, Orica's privacy statement and relevant local legislation. By working with Orica, you agree that your personal information can be processed (including disclosure to Orica companies, suppliers and regulators worldwide) and that you will handle the personal information of others only when reasonable and necessary for Orica business purposes. These business purposes include monitoring your use of our systems or devices to check compliance with the law and Our Code.

Limit personal information you store on our systems. Never include sensitive or financial information, such as personal credit card details, unless necessary. To read Orica's privacy statement, please see orica.com/privacy

ALWAYS	NEVER
<ul style="list-style-type: none"> ✓ Comply with privacy and data protection laws ✓ Safeguard personal information from loss, modification or disclosure ✓ Quickly report to the IT Service desk if you suspect personal information or data has been accessed by an unauthorised person or lost ✓ Check the legal requirements before collecting personal information 	<ul style="list-style-type: none"> ✗ Access, use or disclose personal or third-party information without a business purpose ✗ Move personal information between entities or countries without checking it is okay

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I am working on a business improvement project and one of our external consultants asked me to share a spreadsheet containing the names and details of all employees involved. Is this permitted?

The names and details of our employees are personal information so ensure there is a legitimate business need to share the information. You should also check there is an agreement in place with the consultant that requires them to protect data privacy and ensure that the disclosure or sharing of the information is consistent with our published privacy statement. All of this can be tricky, so seek advice from a member of Orica's Legal team if you are unsure.

I would like to collect after hours numbers, home addresses and emergency contacts for our contracted workforce in case of an emergency. I'm unsure if I can collect that personal information so what should I do?

Ask your Human Resources representative as providing this information may have been consented to when your team joined Orica. A member of Orica's Legal team can also confirm if it is an appropriate business purpose and that you have the right safeguards in place.

NEED HELP? ASK YOUR

- manager
- Human Resources representative
- member of Orica's Legal team
- IT Service desk.

Or send an email to codeofconduct@orica.com or privacy.australia@orica.com

MORE INFORMATION

- Group Standard: Human Resources
- Orica Privacy Statement: orica.com/privacy



COMPETE ETHICALLY AND LAWFULLY

It is important for us to compete vigorously in the marketplace, however we must also act with integrity and adhere to all applicable laws that promote competition and protect consumers.

These laws promote fair competition for the benefit of consumers and the market. They are known as 'competition' or 'anti-trust' regulations and are designed to stop companies colluding with competitors or from using their market power to reduce competition. When we buy products and services from our competitors, we must always comply with competition regulations.

Competitors can include anyone who has the ability or the capacity to compete with Orica. This can include, but is not limited to, companies that compete with us for customer contracts and companies that compete with us for source material.

? WHAT MUST YOU DO?

It is important to be aware of what we can and cannot do when interacting with competitors and customers. Ensure any agreements or arrangements with competitors do not reduce competition and that we do not misuse our market power with customers or suppliers.

ALWAYS



- ✓ Ensure any agreements or arrangements with our competitors are approved by a member of Orica's Legal team
- ✓ Obtain approval from a member of Orica's Legal team if you want to join an industry initiative or association that involves competitors
- ✓ Seek advice from a member of Orica's Legal team prior to discussing a product, service or asset with a competitor

NEVER



- ✗ Impose a minimum price for resale or transfer of Orica products
- ✗ Share information about tender activities with a competitor
- ✗ Allocate markets, market sectors or territories with a competitor
- ✗ Agree with a competitor to fix or limit volumes of supply or production
- ✗ Communicate false information about our competitors
- ✗ Collude with a competitor to win a bid or tendering activities
- ✗ Engage in any activity that could distort the market



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I have a meeting with a competitor scheduled. What should I do?

When meeting with a competitor, certain steps must be undertaken prior to and during the meeting:

- Prepare, or obtain from the competitor, an agenda containing specific topics for discussion for the meeting (avoid 'other business' or 'miscellaneous' as an agenda item).
- Prepare, or obtain from the competitor, minutes of the meeting, confirm they are accurate and keep them in record.
- Limit information discussed to that which is strictly necessary.
- Do not exchange competitively sensitive information that does not relate to the transaction you are exploring with the competitor.
- Terminate the meeting or discussion if there is any topic raised that conflicts with the principles set out on the Group Standard: Ethics & Compliance.

My team and I have decided to refuse to supply a new distributor because its marketing strategy is not as strong as we think it should be. Is this a valid action?

Never refuse to supply a customer unless for genuine reasons including:

- The product being unavailable or in short supply.
- Customers not being prepared to pay a reasonable market price.
- Concerns about:
 - customer credit risk
 - the customer's ability to use the product safely
 - the customer's intention to use the product for a purpose other than its intended purpose
 - compliance with Sanctions laws.

Prior to refusing to supply a customer, please obtain advice from a member of regional management team and Orica's Legal team for the relevant region.

We are aware a new competitor is seeking to enter our market. During a recent meeting, some of our existing competitors proposed that we should all decrease the price of our services by 70% to counter this new competitor. Is that a valid action?

This action should not be undertaken as it involves collusion between market participants for the purpose of preventing a new competitor from gaining entry to the relevant market. Such actions are illegal and could lead to criminal liability for you and Orica. You should object that the proposed conduct is not lawful and request that your objection be noted in the meeting minutes, then terminate the meeting and immediately contact a member of the Legal team for the relevant Region.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- member of Orica's Legal team
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Ethics and Compliance
- Group Standard: Procurement



ACT ON CONFLICTS OF INTEREST

A conflict of interest can exist if you have a personal interest in a decision being made, where that decision should be made free from bias and solely in the best interests of Orica.

We recognise our people have financial interests, participate in activities outside of their work and relationships and networks with others. This includes close personal relationships you may have with other Orica employees, contractors or suppliers, relevant personal financial interests, working with family members, or taking additional jobs, whether paid or unpaid.

Some examples that could create a conflict of interest for you are:

- Working with a family member or partner where you are able to make employment decisions that affect them, such as appointment, promotion, performance, pay or hours.
- A financial interest in a business that is competing to provide services to Orica.
- A close personal relationship with someone who works for a supplier where you are responsible for making a decision about our commercial relationship.

? WHAT MUST YOU DO?

Always avoid situations which could create an actual or perceived conflict between your interests and those of Orica. If such a situation arises, you must put Orica's interests before your own, be honest, transparent and disclose the situation to your manager, and seek direction on how to manage the potential conflict.

ALWAYS



- ✓ Inform your manager about any potential or actual conflict of interest
- ✓ Disclose close personal relationships that may involve a conflict of interest to your manager
- ✓ Excuse yourself from making decisions if they involve your personal financial interests, or friends, family or anyone with whom you have a close personal relationship
- ✓ Get approval before taking on a second job or advisory position

NEVER



- ✗ Improperly use your position for a personal advantage
- ✗ Take a position or employment with a competitor, supplier or customer while working at Orica
- ✗ Be involved in decisions where you have a personal interest
- ✗ Directly manage someone with whom you have a close personal relationship, even if that relationship is temporary

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

Orica is seeking to engage a tax consultant in my country. My wife owns a business which is one of several bidders for this. I work in Orica's Human Resources function and am not involved in the procurement process. Do I need to declare anything?

Although you are not involved in the procurement process, there is a risk of a perceived conflict of interest based on your general employment with Orica. It is important that you disclose this relationship to your manager so measures can be taken to ensure any perceived conflict is appropriately managed. Such measures might include restricting your access to relevant files on the shared drive and ensuring any meetings for the process are conducted away from your work area.

I have a close personal relationship with someone who works for Orica. This person reports to a team leader who ultimately reports to me. Given I am not involved in the direct management of this person, we have not told anyone about the relationship. Is this okay?

While you are not responsible for the direct management of this person, you have authority over the team which this person works in. This creates a situation where decisions you make could be influenced, or be seen to be influenced, by your relationship in a way which conflicts with the interests of Orica. You must therefore disclose the relationship to your manager and excuse yourself from any decisions that could be perceived as being influenced by your relationship.

I would like to start driving for a ride-sharing provider to earn extra money on weekends. Is this acceptable?

You can undertake outside work if it does not interfere with your work at Orica, does not create a potential conflict of interest for you, is not with a competitor, supplier or major customer of Orica, and is not with a government advisory body or trade association.

NEED HELP? ASK YOUR

- manager
- Ethics and Compliance representative
- member of Orica's Legal team
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Sustainability, Government and Community Relations



TAKE CARE WITH GIFTS AND HOSPITALITY

Hospitality, including entertainment, and the giving of gifts is part of developing business relationships with existing and prospective customers and, other stakeholders. However, they must only be given or received without obligation be reasonable in cost and consistent with our values.

? WHAT MUST YOU DO?

Anything of value that is offered, given or received in connection with your work for Orica must:

- Be for a legitimate business purpose.
- Be modest in value and nature.
- Be in good faith, occasional, appropriate, reasonable and comply with any applicable rules and regulations.
- In respect of government officials or state-controlled customers, comply with their rules and regulations.
- Never be in cash or cash equivalents such as vouchers or credit notes.
- Never be connected in any way to the obtaining of an inappropriate advantage or benefit.

ALWAYS



- ✓ Be familiar with the value limits on gifts and hospitality for your country under the Group Standard: Ethics and Compliance and register and obtain prior approval for all items above these limits in the Ethics and Compliance System
- ✓ Refuse gifts or entertainment designed to influence a business decision
- ✓ Ensure gifts, hospitality or experiences given are modest in value and appropriate in nature

NEVER



- ✗ Give or accept anything when a negotiation is underway or which could influence a decision or action to be taken
- ✗ Provide any gifts, hospitality or experiences that could be considered as inconsistent with our values or Group Standard: Ethics and Compliance

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

We have won a large bid for blasting services in China and signed the contract with the customer. To celebrate, we organised an event in a cocktail lounge and invited five guests from the customer to celebrate working on this project together. To mark the occasion, we would like to give each customer representative attending this event a commemorative gift of a replica MMU valued at AUD200 each. Is this permitted?

Given each corporate gift value will be more than AUD75, the Group Standard: Ethics and Compliance requires you to submit a notification in the Ethics and Compliance System and obtain approval from the Ethics and Compliance team before you make the offer. The same approach should also be taken if the cost of the event at the cocktail lounge will be more than AUD75 per person.

While applying for customs clearance for a recent shipment, I was approached by a customs official who advised that if I paid for him and his five colleagues to go out for dinner that evening, my shipment would be cleared immediately. If not, my shipment could be held in customs for a week. Although the cost is unlikely to exceed AUD150 per head I am not sure whether this is permissible. What should I do?

The request from the customs official amounts to a request for a bribe. We are not allowed to provide hospitality that is connected in any way to the obtaining of an inappropriate advantage or benefit. To provide such hospitality would be illegal and is not consistent with our values or the Group Standard: Ethics and Compliance. You should report this request to your line manager and submit a notification of an attempted bribe via the Ethics and Compliance System.

NEED HELP? ASK YOUR

- manager
- finance representative
- Ethics and Compliance representative
- travel coordinator
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Travel, Entertainment and Expenses
- Group Standard: Ethics and Compliance
- Orica Ethics and Compliance System



QUESTIONS AND ANSWERS (CONTINUED)

A quick set of scenarios to help you on your way.

I recently attended a meeting with one of our largest customers to celebrate our second successful year working together. On arrival at the customer site, the General Manager presented me with an expensive watch in recognition of my work this year. As I didn't want to offend the customer by refusing the gift, I accepted the watch to avoid embarrassment. However, I did not have time to seek prior approval or to submit a notification within the Ethics and Compliance System and am now concerned that I have acted contrary to the Group Standards. What should I do?

This is a difficult situation. In these circumstances, if you do not have time to seek advice, then you should do what you think is right in the circumstances to prevent causing offence to the customer. Regardless of whether you accepted the watch that was offered, you should contact your line manager and your Regional Ethics and Compliance Manager as soon as possible to notify the offer that has been made, how you responded, and request advice on the best way to proceed. At a minimum, this will need to be recorded in the Ethics and Compliance System after the event, however depending on the value, it may also be necessary to consider additional measures such as politely returning the gift or accepting it on behalf of the company, on the basis that the value of the gift will be donated by Orica to a local charity.

My manager asked me to organise an upcoming client celebration to mark the closing of an important contract. My manager requested we hold the event at an adult nightclub as our clients enjoy this kind of entertainment and my manager wants to keep them happy. What should I do?

This form of entertainment is not acceptable or consistent with our values. When representing Orica, we must behave in a manner which will stand up to public scrutiny, is consistent with our values and enhance the reputation and standing of Orica. Raise the incident with your manager and Human Resources.

NEED HELP? ASK YOUR

- manager
- finance representative
- Ethics and Compliance representative
- travel coordinator
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Travel, Entertainment and Expenses
- Group Standard: Ethics and Compliance
- Orica Ethics and Compliance System



WE ARE COMMITTED TO EXCELLENCE.

**WE TAKE ACCOUNTABILITY
FOR OUR BUSINESS AND FOR
DELIVERING OUTSTANDING
RESULTS.**

We deliver this by expecting
our people to:

- Use assets and resources wisely and accurately.
- Protect our assets, equipment and property.
- Protect our information systems, networks and devices.





USE ASSETS AND RESOURCES WISELY AND MAINTAIN ACCURATE RECORDS

We must always ensure that we use Orica assets and resources wisely. Financial delegations are important and apply to everyone. Cash and cheques must be controlled to guard against loss and protect against fraud or other misuse. Processes to order and contract for products, services or supplies are designed to protect Orica's interests, maximise commercial interests and minimise financial and legal exposure.

Complete, accurate and timely business records are vital to transparent communication of Orica's business status. Business records may be subject to public disclosure and individuals can be subject to legal action for improper record keeping. We may terminate contracts of employment if we find misuse of our assets, theft or fraud, or deliberate inaccuracies in our records. We may also press for criminal prosecution and seek financial recovery through civil proceedings.

? WHAT MUST YOU DO?

Follow all financial controls and processes that are designed to minimise risk and protect Orica from fraud and loss. Ensure all business records – financial, human resources, payroll and environmental records – accurately reflect the underlying facts and figures. Use our assets or equipment only for legitimate purposes.

ALWAYS



- ✓ Create and maintain complete, accurate and timely business records
- ✓ Retain business records as required by applicable document retention laws
- ✓ Comply with applicable internal controls, accounting standards and legal requirements
- ✓ Act within your delegated authority and seek appropriate authorisation of payments and transactions
- ✓ Ensure any spend you incur or approve for others is appropriate and has a legitimate purpose
- ✓ Co-operate with any requests from auditors
- ✓ Report any suspected theft or fraud or suspicious payments and question unusual payments
- ✓ Comply with the Travel and Entertainment Credit Card and Expense Claims group procedure document

NEVER



- ✗ Bypass delegated authorities or controls that prevent theft or fraud
- ✗ Use or authorise the sale of our assets or resources for personal advantage
- ✗ Alter, destroy or remove company property or records unless authorised to do so
- ✗ Influence or allow others to do anything that would compromise the integrity of Orica's records
- ✗ Directly or indirectly coerce, manipulate, mislead or fraudulently influence Orica's internal and external auditors



QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

We have been renovating our office and there are surplus materials that I have heard are going to be thrown out. Can I take these materials home as no money is being lost?

Even though the items are waste, they are still Orica property and cannot be removed without proper authorisation. Seek permission from your supervisor or manager before removing any items from site.

I have been issued with a corporate credit card to pay for my business expenses when I am traveling. The card has my name on it. Can I use it for private purposes and then make a personal payment to the card issuer when I get my monthly statement?

No, the card is issued to you for managing legitimate work related expenses only. It is not to be used for personal reasons. Failure to comply could be considered deceptive and fraudulent.

A colleague of mine took annual leave over the last vacation period and hasn't submitted a leave form for it yet. I am not sure if our manager knows about it. What should I do?

Taking leave without proper approval is fraudulent and deceptive as it means that the person is being overpaid. Raise it with your manager or your Human Resources representative.

I have just joined the Finance team and seen we are paying an allowance to one of the managers that I don't think they're entitled to. I have been told it's been happening for years and to leave it alone. What should I do?

Speak to a Human Resources representative to check whether the payment is legitimate. It is your right and your responsibility to check.

NEED HELP? ASK YOUR

- manager
- finance representative
- travel coordinator
- member of Orica's Legal team
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Orica Group Delegations of Authority – Financial Matrix
- Group Standard: Group Documents and Record Retention
- Group Standard: Finance
- Group Standard: Human Resources
- Group Standard: Procurement
- Group Standard: Travel & Entertainment Credit Card and Expense Claims





PROTECT OUR ASSETS, EQUIPMENT AND PROPERTY

Protecting our assets, equipment and property means safeguarding them from theft or damage. We adopt a total lifecycle approach to our assets to ensure they are operated and maintained in accordance with design requirements, operate safely and optimise the value generated by the asset. All controls securing our plant and equipment must be in place to prevent vandalism, sabotage or theft.

We also protect our intellectual property (including patents, copyright, trademarks and trade secrets) and closely monitor for unauthorised use of our intellectual property by others. We take care to respect the intellectual property of others such as partners, customers and suppliers.

? WHAT MUST YOU DO?

Use assets, equipment and technology in a secure and responsible way that protects them against damage, loss, theft or unauthorised access. All fixed assets must be properly recorded, inventoried and disposed of in a way that maximises value for Orica and complies with correct procedures. Act to protect the intellectual property of Orica and others.

ALWAYS 	NEVER 
<ul style="list-style-type: none"> ✓ Protect Orica equipment and assets from theft or damage ✓ Ensure all assets and equipment are maintained and recorded as per Orica standards ✓ Seek approval before sharing Orica intellectual property or using others' intellectual property 	<ul style="list-style-type: none"> ✗ Leave equipment or assets unsecured and unattended ✗ Fail to regularly inspect and replace equipment in accordance with Orica standards ✗ Share Orica intellectual property with someone outside of Orica without your manager's approval ✗ Bring any confidential information from prior employers or customers to Orica ✗ Download or print Orica confidential information and store or distribute it outside of Orica unless you are authorised and the information is secured from unauthorised loss, modification or disclosure

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

We have equipment at our site which is nearing the end of its lifecycle. Should we keep using it until it no longer works?

No, you should only use equipment when it is safe to do so. Equipment that is beyond its lifecycle should never be used if it presents a safety risk. When equipment has been replaced it must be disposed of properly and recorded appropriately in the asset inventory.

I'm leaving Orica to take a job elsewhere. Can I take any of my work with me?

Generally, any work created that relates to our business or operations is owned by Orica and cannot be used outside of the company. There may be limited circumstances where Orica will permit you to use that work, but only with prior written permission and after any confidential information has been removed. You should discuss this with your manager prior to exiting Orica.

NEED HELP? ASK YOUR

- manager
- Asset Management representative
- member of Orica's Legal team
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Asset Lifecycle Management
- Group Standard: Physical Security



PROTECT OUR INFORMATION SYSTEMS, NETWORKS AND DEVICES

Orica's information systems and networks enable employees, contractors and others working with us to undertake their work. We have controls in place to help protect our systems from damage or loss and to maintain the security of our networks. In cases where there is a significant risk or a breach of Our Code is suspected, your use of information technology may be monitored, and where appropriate and allowed by law, your access may also be blocked.

To the extent permitted by law, we reserve the right to monitor or audit use of our information systems and to access electronic communications or information stored on systems, devices or equipment for maintenance, business needs or to meet a legal or policy requirement.

? WHAT MUST YOU DO?

Use the information assets, technology and networks we provide in a secure and responsible way that protects them against damage, loss, theft or unauthorised access. You must always obtain authorisation from Orica IT for all services, software and hardware operating on, or interacting with, the Orica corporate network. You must also be alert and report any IT security incidents or attempts to obtain sensitive information such as usernames, passwords, and financial details.

ALWAYS 	NEVER 
<ul style="list-style-type: none"> ✓ Keep your passwords secure and lock your computer ✓ Secure confidential and sensitive information ✓ Access only authorised systems and information ✓ Protect your IT equipment from theft or damage ✓ Complete assigned security awareness training ✓ Report any suspect loss or unauthorised access quickly 	<ul style="list-style-type: none"> ✗ Download unlicensed software ✗ Install unauthorised software or hardware ✗ Access business applications without authorisation and a business purpose ✗ Leave your computer or other mobile device unsecured ✗ Use Orica information equipment or systems to view, store or distribute information that could be interpreted as illegal, racist, violent, pornographic or sexually explicit

QUESTIONS AND ANSWERS

A quick set of scenarios to help you on your way.

I have noticed that a colleague has been spending a lot of time on social media sites. Is this allowed and should I tell anyone?

Reasonable personal use of Orica's electronic resources, including occasional emailing of family/friends, short web browsing sessions and brief personal phone calls/SMS, is allowed. However, non-work related video streaming, lengthy social media/shopping sessions/personal calls are all examples of unreasonable personal use and prohibited. In this instance, your colleague may be breaching Our Code. Your colleague may also be in breach if what they are saying or doing on social media is inappropriate or against the law. You should let your manager know, so they can consider whether the time spent is reasonable and content is appropriate.

How should I save my documents and emails so they are secure, especially when I need to transfer to someone else?

It is your responsibility to ensure the information you have access to is treated securely, and that all Orica information is protected unless it is classified as public. Always save your documents and emails to a secure location complying to the standards provided by Orica IT, including the use of OneDrive and SharePoint. If you need to transfer confidential information to someone else via a portable device such as a USB stick, you must ensure the information is properly encrypted, the USB stick is treated securely, and the information is deleted off the device once it has been used. For help speak to our IT Service desk.

NEED HELP? ASK YOUR

- manager
- IT Service desk or local IT representative
- Human Resources representative.

Or send an email to codeofconduct@orica.com

MORE INFORMATION

- Group Standard: Information Technology

CALL THESE NUMBERS TO SPEAK UP

AUSTRALIA, PACIFIC AND ASIA

Australia	Dial 1800 319 493
China	Dial 4008 423 493
India	Dial 0001 17 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
Indonesia	Dial 0018 0110 after the English prompt dial 8447 427 280
Malaysia	Dial 1800 800 011 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
New Zealand	Dial 0009 11 after the prompt dial 8447 427 280 (Call not available from mobile phone)
Papua New Guinea	Dial 0008 612 52 (Call not available from mobile phone)
Philippines	Dial 1010 551 100 (PLDT - Tagalog Operator) or 1051 1 (Globe, Philcom, Digitel, Smart) after the English prompt dial 8447 427 280 (Call not available from mobile phone)
Singapore	Dial 8001 102 325

EUROPE, MIDDLE EAST AND AFRICA

Austria	Dial 0800 200 288 after the English prompt dial 8447 427 280
Belgium	Dial 0800 100 10 after the English prompt dial 8447 427 280
Bulgaria	Dial 0080 000 10 after the English prompt dial 8447 427 280
Czech Republic	Dial 0080 022 255 288 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
Estonia	Dial 8001 2001 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
Finland	Dial 0800 110 015 after the English prompt dial 8447 427 280
Germany	Dial 0800 225 5288, after the English prompt dial 8447 427 280
Ghana	Dial 0242 426 004 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
Kazakhstan	Dial 8^ 8001 214 321 (^ Indicates second dial tone) after the English prompt dial 8447 427 280 (Call not available from mobile phone)

Mozambique	Contact local operator and request reverse charge/collect call to the United States to number 5034 952 677
Norway	Dial 8001 9011 after the English prompt dial 8447 427 280
Poland	Dial 0080 015 102 50
Portugal	Dial 8008 001 28 after the English prompt dial 8447 427 280
Russia	Dial 8108 002 383 1044
Senegal	Dial 8001 030 72 or 8001 030 73 (French Operator) after the prompt dial 8447 427 280 (Call not available from mobile phone)
South Africa	Dial 0800 001 710
Spain	Dial 9009 900 11 after the English prompt dial 8447 427 280
Sweden	Dial 0201 408 259
Ukraine	Dial 0800 502 886 after the English prompt dial 8447 427 280 (Call not available from mobile phone)
United Kingdom	Dial 0800 890 011 after the prompt dial 8447 427 280 (Call not available from mobile phone)

CALL THESE NUMBERS TO SPEAK UP

LATIN AMERICA

Argentina	Dial 0800 4447 343
Brazil	Dial 0800 892 0382
Chile	Dial 8002 252 88 (Telmex - 800) or 8008 002 88 (Telefonica) or 8003 603 11 (ENTEL) or 8003 603 12 (ENTEL - Spanish Operator) after the prompt dial 8447 427 280 (Call not available from mobile phone)
Colombia	Dial 0180 0911 0010 or 0180 0911 0011 (Spanish Operator) after the prompt dial 8447 427 280
Panama	Dial 8000 109 or 8002 288 (Spanish Operator) after the prompt dial 8447 427 280
Peru	Dial 0800 502 88 or 0800 500 00 (Spanish Operator) after the prompt dial 8447 427 280
Venezuela	Dial 0800 2255 288 or 0800 552 6288 (Spanish Operator) after the prompt dial 8447 427 280 (Call not available from mobile phone)

NORTH AMERICA

Canada	Dial 1844 742 7280
Dominican Republic	Contact local operator and request reverse charge/collect call to the United States to number 5034 952 676
Mexico	Dial 0018 448 757900
United States	Dial 1-844-742-7280



If you are located in a country that does not have a number listed, you can still report in your preferred language using either:
EthicsPoint - orca.ethicspoint.com or
Orca Business Conduct Manager - codeofconduct@orca.com

