

Dyno Nobel
Supplier Code of Conduct



DYNO
NOBEL

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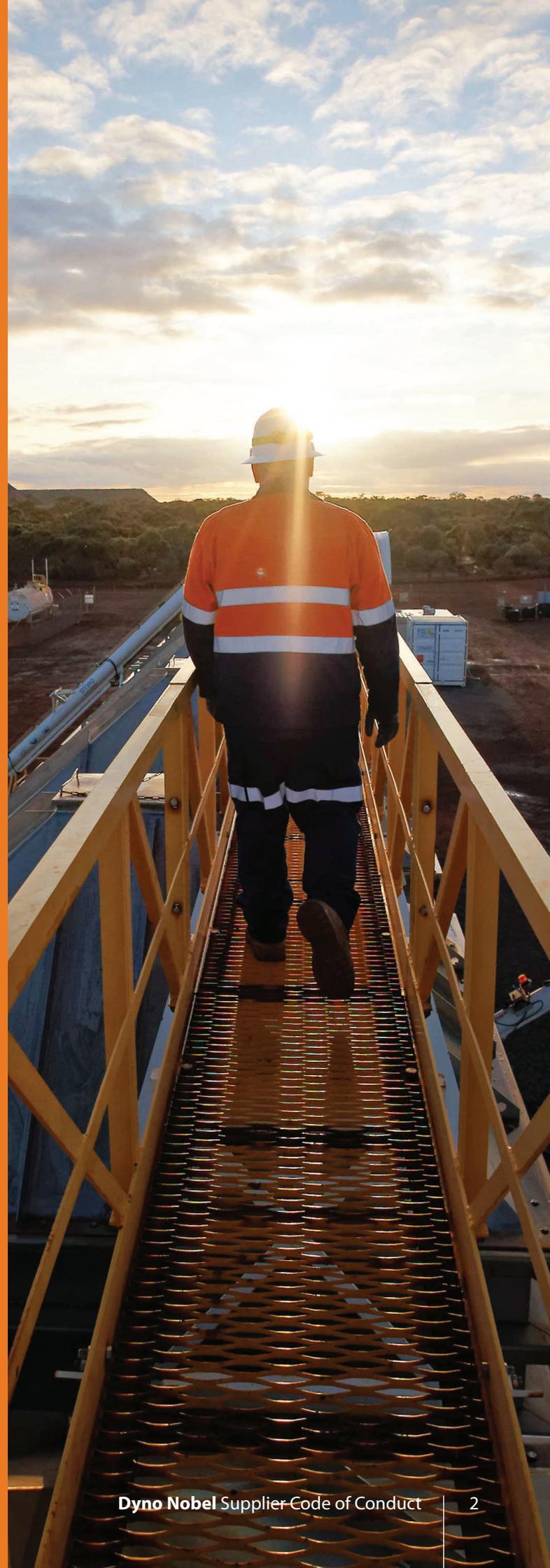
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Introduction

Dyno Nobel Limited and its subsidiaries (Dyno Nobel) are committed to conducting business in a manner consistent with our corporate values and in compliance with the laws of the countries in which we operate.

We are a signatory to the United Nations Global Compact (UNGC) and are committed to operating in a manner consistent with the UNGC's Ten Principles relating to human rights, labour standards, environment, and anti-corruption. These Principles are derived from the Universal Declaration of Human Rights, the International Labor Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

We are committed to engaging with suppliers who demonstrate similar values and adhere to the requirements outlined in this Supplier Code of Conduct (Code) and our Human Rights Policy and conduct their business in compliance with the laws of the countries in which they operate.

This Code applies to all entities and individuals that are involved in the supply of goods or services to Dyno Nobel (Suppliers).

Values



Zero Harm
for Everyone
Everywhere



Care for the
Community &
our Environment



Think Customer.
Everyone.
Every day.



Value people –
Respect, Recognise
& Reward



Challenge &
Improve the
Status Quo



Treat the
Business as
your Own



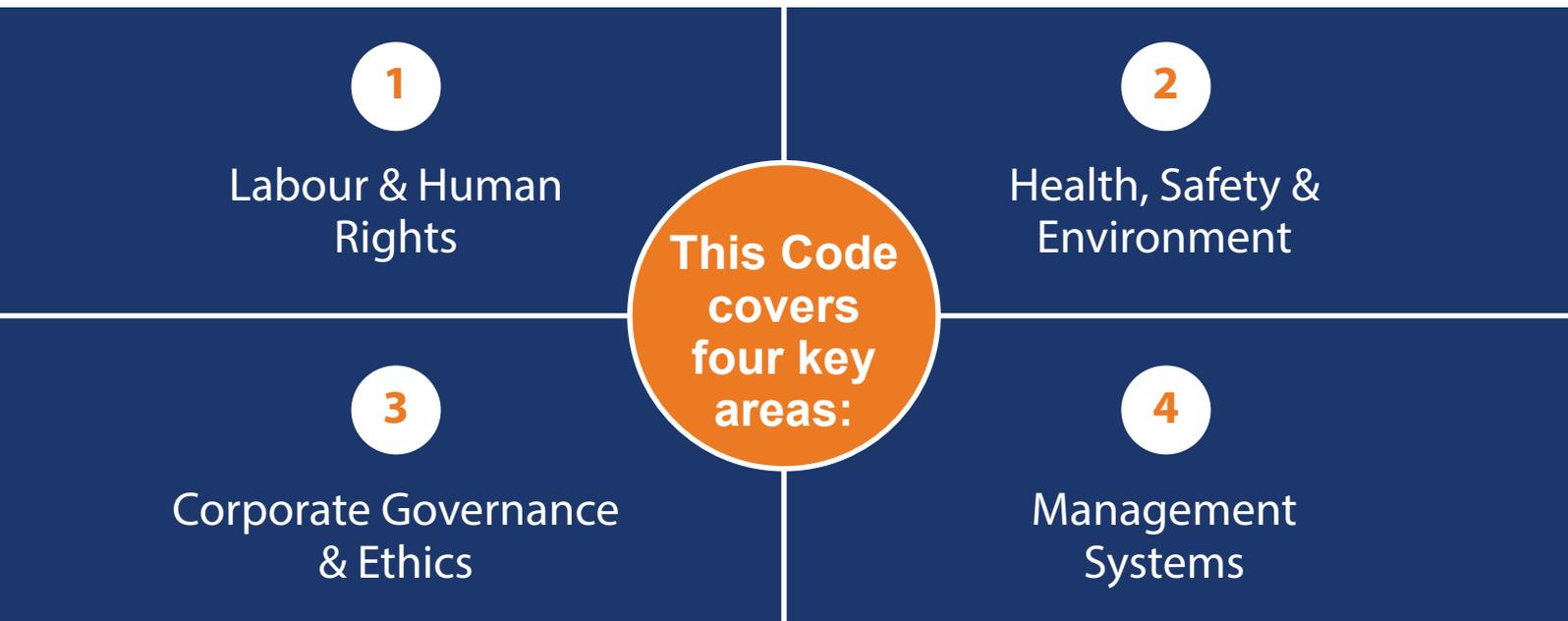
Deliver
on our
Promises

Purpose & Scope

This Code outlines the standards and behaviours we expect from our Suppliers in demonstrating their commitment to ethical sourcing practices and the law. It is aligned with our purpose and values and reflects the UNGC's Ten Principles as well as applicable international frameworks and Dyno Nobel policies.

By agreeing to comply with this Code, Suppliers affirm they are committed to working with Dyno Nobel and that their conduct is aligned to our values, purpose, and expectations. A Supplier's commitment to comply with the Code will be considered as part of Dyno Nobel's supplier selection and management processes. Suppliers may be requested to reaffirm compliance with the Code periodically and Dyno Nobel will be entitled to perform due diligence on Suppliers to determine their compliance with the terms of this Code.

It is the Supplier's responsibility to achieve and maintain the standards outlined in this document, and to ensure the Code is communicated within their organisation and to any of their suppliers involved in the supply of products and/or services to Dyno Nobel.



1 Labour & Human Rights

We expect that Suppliers will respect the human rights of their workers (including Suppliers' employees and contractors) and treat them with dignity and respect. Suppliers must assess and act on the risks of human rights breaches or abuses across their operations. This includes, but is not limited to, the following requirements:

Freedom of employment

Workers must not be subject to any form of forced, compulsory, bonded, indentured, or involuntary prison labour, slavery, or human trafficking. This includes transporting, harbouring, restrictions on movement, recruiting, transferring or receiving persons by means of threat, force, coercion, deception, abduction, or fraud for the purpose of labour or service. Workers must be free to express their concerns about conditions of work without penalty.

All workers must have the freedom to determine and terminate their employment on fair terms.

Child labour

Suppliers must not use child labour at any tier within the supply chain. Child labour is work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Child labour includes work that interferes with their schooling or is mentally, physically, socially or morally dangerous and harmful to children.

Working hours

Suppliers must ensure workers are not forced to work in excess of the number of hours permitted in local laws.

All overtime should be purely voluntary unless part of a legally recognised collective bargaining agreement. No worker should be required to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker should be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

Wages & benefits

Suppliers must comply at a minimum with all laws regulating local wages, overtime compensation and legally mandated benefits.

Wage payments should be made at regular intervals and directly to workers and should not be delayed, deferred, or withheld. Only deductions, advances, and loans authorised by applicable laws are permitted and, if made or provided, actions shall only be taken with the full consent and understanding of workers.

Suppliers must provide clear and transparent information to workers about hours of work, rates of pay, and the calculation of legal deductions.

All workers must retain control over their earnings. Suppliers must not use wage deductions as a disciplinary measure, or to keep workers tied to the employer or to their jobs. Suppliers shall not hold workers in debt bondage or forced labour to pay off a debt. Deception in wage commitments, payment, advances, and loans is prohibited.

Recruitment fees, deposits & security payments

Workers must not be required to pay any recruitment fees or related costs for their employment, either directly or indirectly. This includes agents' recruitment fees and costs associated with travel, processing official documents and work visas in either their country of origin or the host country.

At no time shall workers be required to lodge any deposits or security payments.

If any such fees or costs are found to have been paid, these must be repaid to the worker.

Contracts of employment

Workers must be provided with written contracts which clearly indicate their rights and responsibilities regarding wages, working hours, and other working and employment conditions.

Employment contracts must be provided in a language the worker understands, and Suppliers must provide migrant workers with their employment contract prior to deployment. If a worker is illiterate, the contract should be read to them to ensure they understand the content.

The use of supplemental agreements and the practice of contract substitution (the replacement of an original contract or any of its provisions with those that are less favourable) are strictly prohibited.

Labour hire agencies & recruiters

When the subcontracting of recruitment and hiring is necessary, companies shall ensure that the labour agencies they engage operate legally, are certified or licensed by the competent authority, and do not engage in fraudulent or other behaviour that places workers at risk of forced labour or trafficking for labour exploitation.

Document retention

Confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation, such as passports, is strictly prohibited.

The retention of personal documents shall not be used to bind workers to employment or to restrict their freedom of movement.

Anti-discrimination, harassment & bullying

All conditions of employment must be based on an individual's ability to do the job, not on personal characteristics such as gender, ethnic origin, religion, age, disability, marital status, union membership or political affiliation. Suppliers should promote equal opportunities and treatment of employees throughout the recruitment process and the term of employment. They must not discriminate against any worker because of a legally protected attribute. Legally protected attributes include race or colour, age, disability or impairment, religious belief or activity, gender or gender identity, relationship status, sexual preference, pregnancy,

family responsibilities, political views, and trade union membership or activity.

Migrant workers conditions of work (including but not limited to wages, benefits, and accommodations) must be no less favourable than those available to country nationals.

Suppliers must treat all workers fairly, ethically, respectfully and with dignity, and have active protections in place against direct and indirect discrimination, harassment, and bullying. .

Freedom of movement and personal freedom

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or related premises, such as employer- or recruiter-operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.

Working and Living Conditions

Suppliers must provide a safe and hygienic working environment that is without risk to health, taking into consideration knowledge of the relevant industry and hazards. Workers shall receive adequate and regular training to perform their jobs in a safe manner. Personal protective equipment shall be supplied and workers trained in its correct use.

Where Suppliers provide accommodation, it shall be clean, safe and meet the basic needs of the workers, including as a minimum adequate space and amenities such as clean drinking water, hot and cold running water for washing, ventilation, and toilets and, where appropriate, sanitary facilities for food storage and preparation. Workers have the right to refuse accommodation, or work that is unsafe.

Humane treatment

Suppliers must provide a workplace free of any form of harsh or inhumane treatment.

Disciplinary policies and procedures shall be clearly defined and communicated to all workers, and shall not include any inhumane disciplinary measure, including any corporal punishment, mental or physical coercion, or verbal abuse of workers; nor shall they include sanctions that result in wage deductions, reductions in benefits, or compulsory labour.

The use or threat of physical or sexual violence, harassment, and intimidation against a worker, their family, or close associates, is strictly prohibited.

Freedom of association and collective bargaining

Supplier should ensure compliance with local laws in collective bargaining and respect employee rights to collective bargaining.

Workers should be allowed to freely associate with others, form and join (or refrain from joining) organisations of their choice, and bargain collectively without interference, discrimination, retaliation, or harassment.

A parallel means for independent and free association and bargaining is facilitated where the right to freedom of association and bargaining is restricted under law.

Worker representatives are not discriminated against and have regular access to carry out their representative functions within the workplace.

Training

Suppliers should consider providing human trafficking and human rights training to all workers to ensure they fully understand the relevance and importance of these topics.

2 Health, Safety and Environment

We expect that Suppliers will:

establish and maintain health and safety management standards and systems in compliance with applicable laws, industry standards and regulatory requirements.

identify and assess hazards to health and safety and the environment and control these as part of a total risk management process.

provide a safe and healthy work environment for workers, customers and visitors, and promote safe behaviours.

provide regular and recorded health and safety training to all workers to ensure they have the knowledge and skills to undertake their work in a safe and healthy manner.

conduct operations in compliance with all relevant environmental licenses and regulations.

respect the communities in which they and Dyno Nobel operate, their values, and cultural heritage, and be considerate of them in carrying out their operations.

promote the efficient use of resources and energy, and work to minimise their impact on the environment, including waste reduction and minimising greenhouse gas emissions. We encourage suppliers to collaborate with us to find more environmentally friendly and sustainable solutions for the future.

cooperate with Dyno Nobel's requests for information on their health, safety and environment performance, including Scope 3 GHG emissions reporting.

3 Corporate Governance & Ethics

We expect that Suppliers will:

conduct business in an ethical and responsible manner.

comply with all applicable laws and regulations on bribery, improper payments, fraud, corruption and prohibited business practices.

notify Dyno Nobel if they become aware of any actual or potential conflicts of interest that are relevant to Dyno Nobel. Depending on the circumstances, Suppliers may be required to put appropriate measures in place to manage the conflict of interest.

exercise appropriate due diligence in their sourcing of products and services, and to ensure their sourcing practices are ethical, respectful of human rights, and compliant with relevant laws.

clearly document, declare, and submit for approval any subcontract arrangements prior to their commencement.

protect personal privacy, comply with applicable privacy laws, and secure personal data against unauthorised access or use.

have in place all reasonable measures necessary to protect the information technology systems and data (including that of Dyno Nobel) used in connection with the operation of the Supplier's business, and establish, maintain, implement, and comply with reasonable information technology, information security, cybersecurity, data protection, disaster recovery and business continuity controls, policies and procedures.

4 Management Systems

Dyno Nobel expects its Suppliers to develop, implement, maintain, and communicate policies and procedures consistent with this Code and to maintain appropriate management systems and documentation to demonstrate compliance with this Code. This includes having systems and processes in place to identify, assess, and manage modern slavery risks within the Supplier's operations and supply chain. Management accountability and responsibility for ensuring the effective implementation and operation of the management systems must be clearly defined.

Suppliers must take reasonable steps to ensure their suppliers are aware of and compliant with the principles of this Code.

Dyno Nobel has a continuous improvement approach and encourages its suppliers to take responsibility to continually improve their approach to human rights, social compliance, and ethical conduct.

Grievance mechanisms

Suppliers must have systems and processes in place to allow their workers, suppliers, and members of the communities in which they operate the ability to confidentially and anonymously raise concerns. These systems and processes must be clearly communicated, accessible, culturally appropriate, gender sensitive, and available in a language (or languages) workers understand.

Suppliers must implement a process for investigating and remedying complaints in a timely and appropriate manner and which ensures no retaliation in any form.

Supplier diversity

At Dyno Nobel we are continually working on ways to create a more diverse and sustainable supply chain and to support the communities in which we operate.

We are keen to work with Suppliers who promote diversity and inclusion with their supply chains and workforces.

General

To the extent any applicable law or regulation is more stringent than this Code, such law or regulation takes precedence.

If this Code conflicts with the terms of any contract between Dyno Nobel and the Supplier, and the contract term is more stringent than this Code, the Supplier must comply with the contract term.

Assurance & compliance

Dyno Nobel conducts risk-based due diligence on its Suppliers to ensure compliance with this Code and our ethical procurement and social compliance requirements. Due diligence activities include, but are not limited to, self-assessment questionnaires, site visits, site audits, and supply chain mapping. These due diligence activities may be conducted by Dyno Nobel or third parties engaged by Dyno Nobel.

Suppliers must notify Dyno Nobel as soon as practicable if they become aware of an actual or potential breach to this Code.

If Dyno Nobel has reasonable grounds to suspect a breach of this Code, Dyno Nobel may require the Supplier to provide additional information and/or undergo an audit or investigation.

Suppliers are expected to cooperate by providing complete and accurate information and access to workers reasonably required to facilitate Dyno Nobel's due diligence activities and investigations.

If Dyno Nobel determines a Supplier has breached

this Code, it may require the Supplier to implement a corrective action or remediation plan. The Supplier will address any corrective actions in a timely and appropriate manner.

In certain circumstances, Dyno Nobel may suspend or terminate a Supplier's business relationship with Dyno Nobel. This includes situations where a Supplier has failed to rectify or remedy breaches or non-compliances in a timely or appropriate manner.

Additional information

For more information about the Code, or to discuss any questions you may have about the Code and its application in relation to your engagement with Dyno Nobel, please contact your Dyno Nobel representative. Alternatively, you can submit a query or feedback via the Contact Us page on our website – <https://www.dynonobel.com.au/contact-us>.

Reporting concerns

Reports of any breaches or suspected breaches to the Code can be made to your Dyno Nobel representative. If this is not possible or appropriate, concerns may also be raised via Dyno Nobel's whistleblower system.

Dyno Nobel's Whistleblower System

Dyno Nobel is committed to a culture of ethical behaviour, good corporate governance and compliance. We strongly encourage reporting of improper, illegal or unethical behaviour.

Our Group Whistleblower Protection Policy ensures that all staff can confidentially report improper, unethical or illegal conduct. You can raise concerns regarding actual or suspected contraventions of ethical or legal standards, without fear of victimisation, reprisal or harassment.

To assist you raise concerns in a confidential and efficient manner, we have established a Whistleblower process with Navex Global.

Navex Global is an externally managed, worldwide, 24/7 service that is multi-lingual and confidential (you can choose to stay anonymous). It's designed to facilitate the resolution of conduct issues that staff feel they are unable to raise and resolve locally.

You can now access the service and report or follow up a concern on your mobile phone or tablet using this QR code:



In person:

Speak to your supervisor, manager or Human Resources representative or a Whistleblower Protection Officer as set out in the Policy.

Online:

<http://dynonobel.ethicspoint.com>

Phone lines:

Australia	1800 743 483 or 1800 452 415
Benin	01 6150 9982
Cameroon	6568 72972
Canada	866 908 7235 or 866 251 0211
Chile	Dial 800 360 312 first. At the prompt, dial 866 251 0211
France	0 800 99 23 60
Indonesia	001 8031 002 2573
Papua New Guinea	00 086 1198
Singapore	800 852 3055
South Africa	080 001 0727
United States of America	866 908 7235 or 866 251 0211
Mexico	001 844 485 3113
Turkey	From an outside line, dial 0811 288 0001. At the English prompt, dial 866 251 0211

You can find more information on The Hub. Use the Whistleblower System link under the Dyno Nobel Quicklinks section.

Review

This Code will be reviewed on an annual basis and may be updated from time to time.

Related documents

- Human Rights Policy
- Dyno Nobel Code of Conduct
- Health, Safety, Environment & Community Policy
- Dyno Nobel Group Anti-Bribery Policy