

Human Rights Policy

Purpose

The Incitec Pivot Limited (IPL) Human Rights Policy lays out the principles of the IPL Group's approach to human rights in line with the Universal Declaration of Human Rights and other international frameworks. This policy provides the foundation to IPL's human rights approach and applies to IPL and each subsidiary, their employees, directors and agents and contractors.

Our Principles:

1. We respect human rights.
2. We assess our human rights impacts.
3. We strive to integrate human rights considerations into our business and relationships.
4. We engage with stakeholders on human rights.
5. We provide remedy and redress when appropriate.
6. We aim to be transparent and provide accurate and timely disclosure.

Our human rights principles are embedded within multiple policy and procedural documents, including those related to employee safety, health and welfare, employment conditions, diversity, equality, security, environmental management and our communities and stakeholder engagement. Where those policies or procedural documents are inconsistent with this Policy, IPL's Human Rights Policy will prevail.

Commitment

IPL respects and supports the dignity, well-being, and human rights of our employees and those in the communities in which we operate. Our approach to human rights is consistent with the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. We are also a signatory to the UN Global Compact. Our aim is to have a positive impact on our communities and ensure human rights are respected and upheld by providing safe and fair workplaces, working to partner with organisations, including suppliers that respect workers' rights and do not enable or condone modern slavery.

We have a zero tolerance of threats, intimidation, and attacks against human rights defenders. We work to ensure we are not complicit in human rights abuses committed by others.

We comply with local laws wherever we operate. Where local laws differ from our human rights commitments, we will comply with local laws while striving to give effect to our human rights commitments to the extent possible.

Health and safety

IPL respects the rights of employees to a safe and healthy workplace and is committed to the goal of 'Zero Harm for Everyone, Everywhere'. We seek to manage our activities with concern for the safety of our employees, contractors, customers and all persons affected by our operations or products.

IPL has established and maintains health and safety management standards and systems in compliance with relevant industry standards and regulatory requirements and is committed to providing a safe and healthy working environment. IPL strives to be a valued corporate citizen in the communities in which we operate, and is committed to conducting our operations in accordance with all relevant licences and regulations.

Labour relations

IPL respects the rights and dignity of employees throughout its operations and prohibits the use of child labour, forced labour, including indentured labour, bonded labour, modern forms of slavery and human trafficking. IPL is committed to providing:

- clarity with respect to performance expectations of its employees, and ensuring that employees have the necessary tools and support to deliver on these expectations, are recognised and rewarded appropriately if their objectives are achieved, and are coached or counselled where performance expectations are not met;
- appropriate management of the number of working hours in compliance with relevant industry standards and regulatory requirements, as part of our commitment to providing a safe and healthy working environment;
- compensation that, at the very least, meets the legal minimum wage;
- mandatory paid vacation; and
- good-faith relationships with elected employee representatives.

Freedom of Association and Collective Bargaining

IPL respects our employees' right to form, join or not to join a labour union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognised union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Diversity and equal opportunity

IPL is committed to building an inclusive and accessible organisation through the development of a culture that embraces diversity. Embracing diversity is about recognising, respecting, and valuing the unique attributes and different characteristics of each individual. These differences can include, but are not limited to, gender, ethnicity, cultural background, age, disability, sexual orientation, and religious belief.

Discrimination and Harassment

IPL does not tolerate inappropriate behaviour, unfair treatment, or victimisation. Harassment is not tolerated in the workplace or in any work-related circumstance outside the workplace. IPL employees are required to undertake regular training in this area.

Communities and Indigenous peoples

IPL seeks to understand and mitigate the impacts we have on the rights of the communities in which we operate. We acknowledge and respect Indigenous peoples' connections to lands and waters. We respect and acknowledge the UN Declaration on the Rights of Indigenous Peoples and the human rights principles of Free, Prior and Informed Consent. We consult with traditional Indigenous landowners for projects located on their traditional lands to seek agreement on how the project should proceed, as well as providing access to appropriate grievance and dispute resolution processes.

Climate Change

Mindful that climate change and the global commitment to Net Zero emissions will affect IPL's employees and the communities in which it operates, IPL will take into account the principles of a just transition in its decisions regarding decarbonisation.

Third parties

Through appropriate contractual arrangements and ethical procurement principles, we expect our consultants, agents, contractors, and suppliers to respect workers' rights, including the rights of freedom of association and collective bargaining, and we strive to mitigate the risk of modern slavery being present in our supply chains. We seek to influence the joint venture partners and non-controlled companies in which we participate to also respect our commitments to uphold human rights.

Actions to meet Our Commitment

Due Diligence and Audit

IPL is committed to the use of due diligence as a means to identify and prevent human rights risks to people in our business and supply chains, and to undertaking audits as a means of assessing compliance with the law and human rights principles.

Training

We provide human rights related training and capacity building for our employees.

Stakeholder engagement and communication

We are committed to meaningful engagement with our stakeholders, including our employees, customers, suppliers and their workers, and communities in which we operate. We respect the rights of human rights defenders to speak freely without fear of retribution, including where they may criticize our conduct or the conduct of our business associates.

Remediation

We have accessible and safe channels that are open to all stakeholders to raise complaints in relation to human rights and other issues. These grievance mechanisms are set out in IPL's Code of Conduct, Enterprise Agreements, Group Whistleblower Policy, Australian Whistleblower Policy and other human rights related policies.

We are committed to acting as quickly as practicable to remedy any human rights violations that are reported to us or identified by us, including exploitative labour practices and modern slavery. Where we identify that we have caused or contributed to an adverse human rights impact, we will provide for or cooperate in its remediation through legitimate processes.

Governance

IPL's Ethics Committee has operational oversight and responsibility for IPL's response to human rights risks, supported by the Human Rights Working Group. IPL's Audit and Risk Management Committee and Health, Safety, Environment and Communities Committee have responsibility for overseeing IPL's response to human rights risks.

Guidance and Reporting for Employees

IPL strives to create workplaces in which open and honest communication among all employees is valued and respected. The Company is committed to comply with applicable labour and employment laws wherever we operate. Any employee who believes a conflict has arisen between the contents of this policy and the laws,

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customs or practices of their workplace, or would like to confidentially report a potential violation of this policy or local laws, should:

- Talk to their manager or supervisor – this is often the best person to contact first;
- Talk to IPL’s Group General Counsel or Chief Risk Officer;
- Contact the IPL Ethics Committee at ethical@incitecpivot.com.au ;
- Contact the IPL Whistleblower Hotline; or
- In appropriate circumstances (where a personnel matter is concerned), contact Human Resources personnel.

Document Information

The Group General Counsel is responsible for maintaining document information that relates to this policy.

Definitions

Table 0-1 includes terms and definitions relevant to the content of this document unless we have the glossary on the intranet.

Term (Abbreviation)	Definition
IPL Group	All subsidiaries and related bodies corporate of Incitec Pivot Ltd, and all joint ventures in which Incitec Pivot Ltd, or one of its subsidiaries or related bodies corporate, holds a controlling interest.

Table 0-1 – Definitions

Compliance and Conformance Information

The documents in **Table 0-2** list the compliance information used to develop the content.

Reference	Date
Universal Declaration of Human Rights	1948
ILO Declaration on Fundamental Principles and Rights at Work	1998, amended 2022
UN Declaration on the Rights of Indigenous Peoples (UNDRIP)	2007
UN Guiding Principles on Business and Human Rights	2011
UN Global Compact	IPL joined in 2022

Table 0-2 – Compliance information

Related Documents

The information listed in **Table 0-33** are IPL internal documents directly related to this policy.

ID/Number	Type	Title
	Policy	IPL Code of Conduct
	Policy	Anti-Discrimination and Harassment Policy
	Policy	Australian Whistleblower Policy
	Policy	Climate Change Policy
	Policy	Diversity Policy
	Policy	Group Whistleblower Policy
	Policy	Modern Slavery Policy
	Policy	Sanctions Policy

ID/Number	Type	Title
	Policy	Sustainable Communities Policy

Table 0-3 – Related documents

Change Information

The information in *Table 0-* is a summary of the change information for the latest version of this policy.

Version	Date	Details
2		<ul style="list-style-type: none"> - Amended to refer to commitments made as a signing member of UN Global Compact. - Updated to include references to international legal instruments. - Updated to provide order of precedence for IPL human rights related policies, clarifying that Human Rights Policy prevails to the extent of any inconsistency.
1	May 2019	Adoption of IPL Human Rights Policy

Table 0-4 – Change information