

16 December 2021

Company Announcements Office
ASX Limited
Exchange Centre
20 Bridge Street
SYDNEY NSW 2001

Dear Sir/Madam

FY21 Modern Slavery Statement

Please find attached IMDEX Limited's Modern Slavery Statement for the financial year ending 30 June 2021.

Authorised by



Michael Tomasz
Company Secretary
Imdex Limited

This has been approved for lodgement by the Company Secretary

ABOUT IMDEX

IMDEX is a leading global Mining-Tech company, which enables successful and cost-effective operations for drilling contractors and resource companies. The Company develops drilling optimisation products and cloud-connected sensors to provide real-time rock knowledge and quality data. Together they enhance decision making and sustainable operations across the mining value chain – from the drill rig to the core farm and processing plant. www.imdexlimited.com

FURTHER INFORMATION

Kym Clements – IMDEX Investor Relations Officer

Mobile: 0415 181 172 Email: kym.clements@imdexlimited.com

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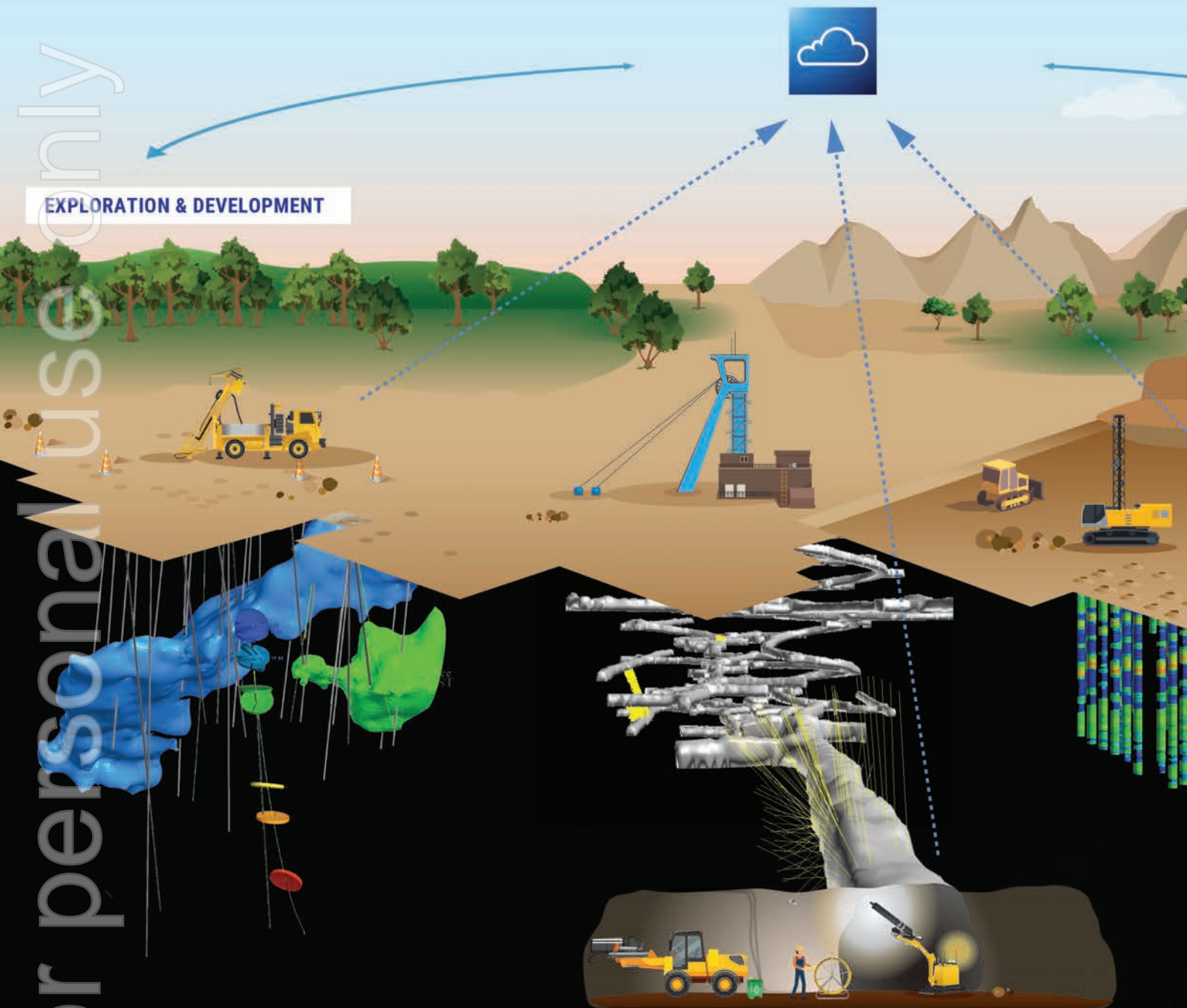


MODERN SLAVERY STATEMENT 2021



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EXPLORATION & DEVELOPMENT



DRILLING
OPTIMISATION
PRODUCTS



ROCK
KNOWLEDGE
SENSORS



REAL-TIME
DATA AND
ANALYTICS

INDEX™ IS A LEADING MINING-TECH COMPANY

We believe mining is essential to all aspects of modern life.

Our opportunity is to change the minerals drilling industry forever.

**OUR PRODUCT OFFERING
AND INTEGRATED
SOLUTIONS ACROSS THE
MINING VALUE CHAIN**

ABOUT THIS STATEMENT

This Modern Slavery Statement (Statement) has been prepared by Imdex Limited (IMDEX) to meet the requirements of the Australian Modern Slavery Act 2018 (Cth) for the financial year ending 30 June 2021 (FY21). IMDEX is a publicly listed company on the Australian Stock Exchange.

Unless otherwise stated, references to 'IMDEX', the 'Group', the 'Company', 'we', 'us' and 'our' refer to Imdex Limited (ABN: 78 008 947 813). References to a year are to the financial year ended 30 June and references to dollar figures are in AUD currency.

This Statement forms part of our annual reporting suite, which includes our Corporate Governance Statement, FY21 Annual Report and FY21 Sustainability Report.



The reporting suite is available on our website at

Corporate Governance Statement <https://www.imdexlimited.com/media/home/Corporate-Governance-Statement-August-2020-Final.pdf>

FY21 Annual Report <https://www.imdexlimited.com/media/investors/IMDEX-Annual-Report-2021.pdf>

FY21 Sustainability Report https://www.imdexlimited.com/media/home/IMDEX-SUSTAINABILITY-2021_Final.pdf

The reporting entity covered by our FY21 Statement is IMDEX, which owns or controls over 30 subsidiaries. These subsidiaries are not reporting entities in their own right and undertake activities relevant to our core business in Africa, the Americas, Asia Pacific and Europe. The Statement was developed in consultation with owned or controlled entities.

Further information regarding this process is outlined on page 29.

APPROVAL

Our FY21 Modern Slavery Statement has been approved by IMDEX Chairman, Anthony Wooles and IMDEX CEO, Paul House.

Anthony Wooles
IMDEX, Chairman of the Board

Paul House
IMDEX, Chief Executive Officer

FEEDBACK AND FURTHER INFORMATION

We value all feedback. Please forward any comments or requests regarding our Modern Slavery to legal@imdexlimited.com.

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IMDEX's focus on its people and its broad approach to their wellbeing, was particularly evident this year.

ANTHONY WOOLLES, IMDEX CHAIRMAN
FY21 ANNUAL REPORT

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We are committed to respecting the human rights of all workers and ensuring that all people are treated with respect and dignity.

PAUL HOUSE, IMDEX CEO



LEADERSHIP SUPPORT

CEO FOREWORD

One of our Company's greatest advantages is its global network. That same advantage, however, confers great responsibility. With a network of IMDEX personnel and distributors driving sales in more than 100 countries, we need to be acutely aware of local conditions, our obligations and our supply chain.

Personally, I have lived and worked in more than 12 countries, many of which were emerging markets. This experience has given me a great appreciation for the diverse communities in which we operate, the standard we must set as a global company and the opportunities we seek to mitigate potential modern slavery risks in our operations and supply chain and enhance the lives of others.

Our commitment as an Executive Committee and workforce as a whole, is to be vigilant and aware of our obligations to all stakeholders.

Our investment in systems and processes within our supply chain for greater transparency and therefore accountability in all aspects of our business, including modern slavery, continues to progress.

Other initiatives include additional internal communications and training regarding modern slavery, a review of our corporate procedures to address modern slavery remediation and strengthening our key risk control mechanisms.

Over the next 12 months we remain watchful of ever-changing local needs and continue to monitor and enhance the rigor within our supply chain. In turn, our efforts provide assurance to our customers that we are appropriately managing possible modern slavery risks.



Paul House

OUR MODERN SLAVERY VISION

- Develop and operate on best practice global principles to manage modern slavery risk in our own business and our supply chain.
- Incorporate modern slavery compliance as part of our sustainability goals.
- Demonstrate continuous improvement in our modern slavery reporting obligations.

Paul House

IMDEX, Chief Executive Officer

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BUSINESS OVERVIEW

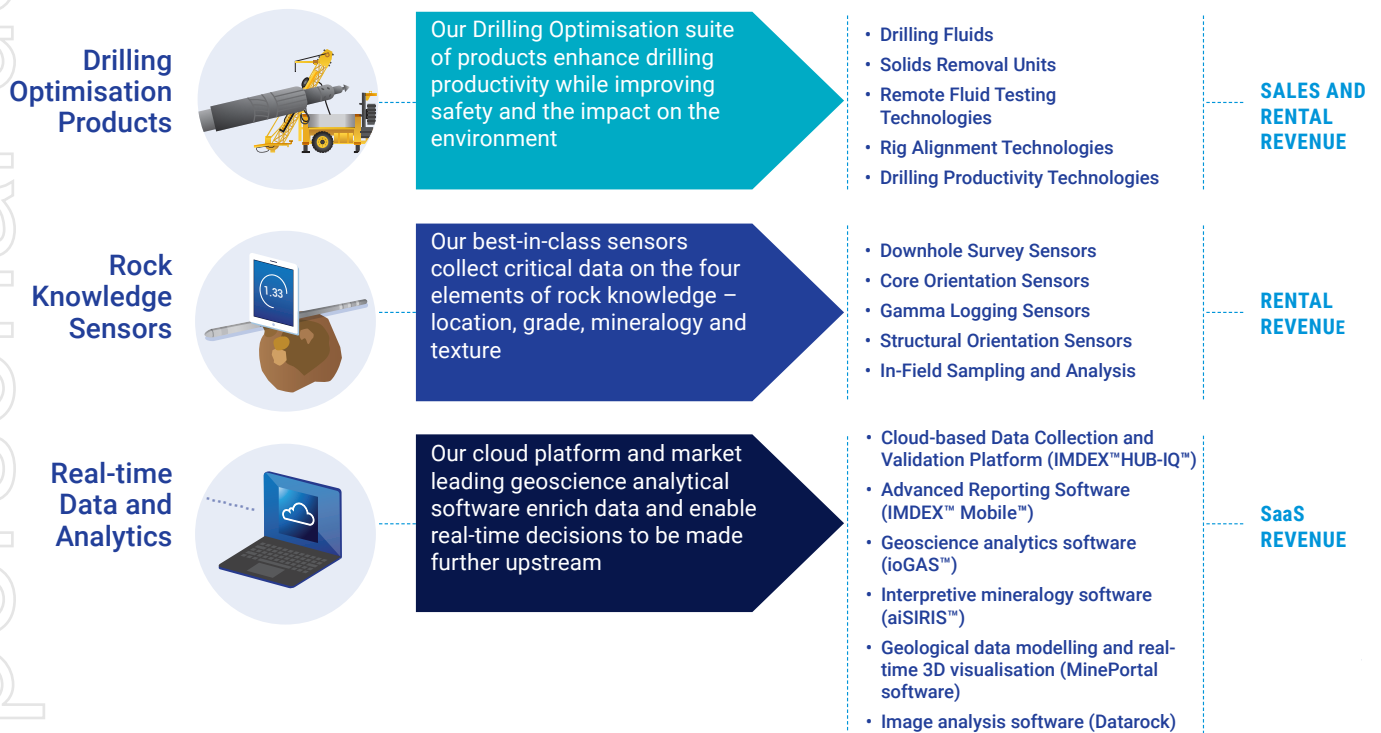
OUR OPERATIONS

IMDEX is a leading global Mining-Tech company that enables drilling contractors and resource companies to find, mine and define orebodies with precision and at speed.

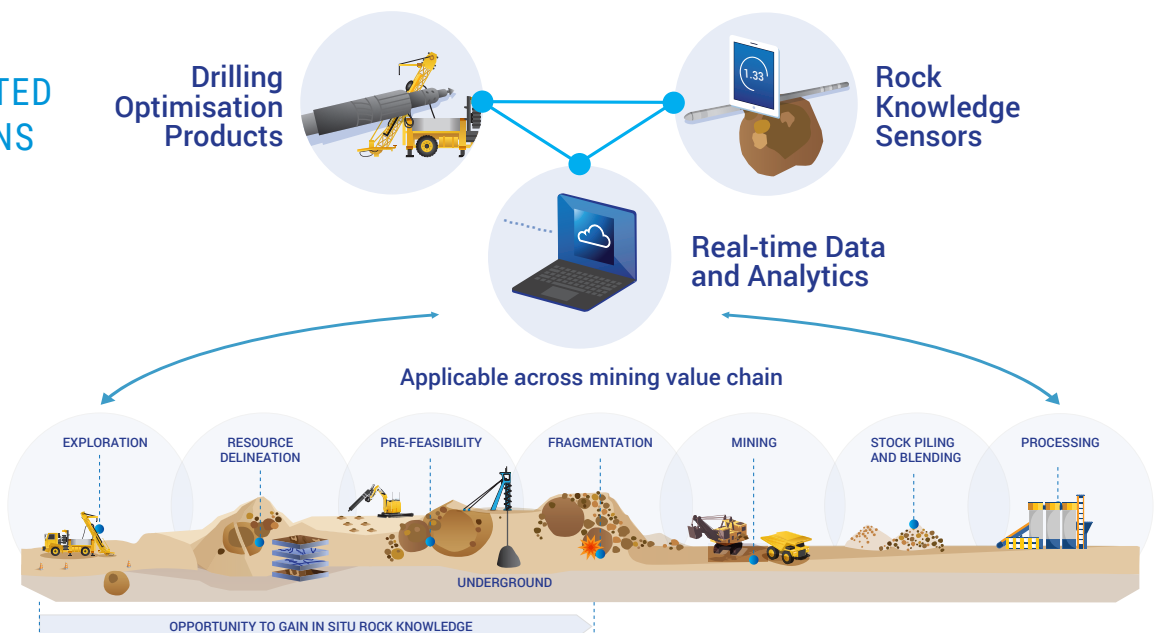
Our product offering includes a broad range of drilling optimisation products, rock knowledge sensors and real-time data and analytics. This product offering is commodity agnostic and can be applied across the mining value chain.

We have two market leading brands, AMC (drilling optimisation products) and REFLEX (rock knowledge sensors and real-time data and analytics). Increasingly we are working with clients to provide integrated IMDEX solutions that unlock real value and provide critical insights.

OUR PRODUCT OFFERING



OUR INTEGRATED SOLUTIONS



OUR GLOBAL BUSINESS

Our global presence is unrivalled. This presence provides a compelling opportunity to embed value for clients and maximise revenue and earnings for IMDEX.

During FY21 we supported clients in more than 100 countries, employed 521 people globally (the majority of which are full time employees) and used over 2,400 suppliers.

We have 22 facilities, including warehouses, manufacturing and calibration centres, in all key mining regions of the world. Our Head Office is located in Balcatta, Western Australia



OUR CLIENTS

Our long-standing client base includes large drilling contractors and tier-1 resource companies within the global minerals industry. We are creating a collaborative ecosystem, where we partner with all clients to optimise orebodies.



**OPERATING
IN ALL KEY
MINING
REGIONS OF
THE WORLD**



**SALES IN
100+
COUNTRIES**



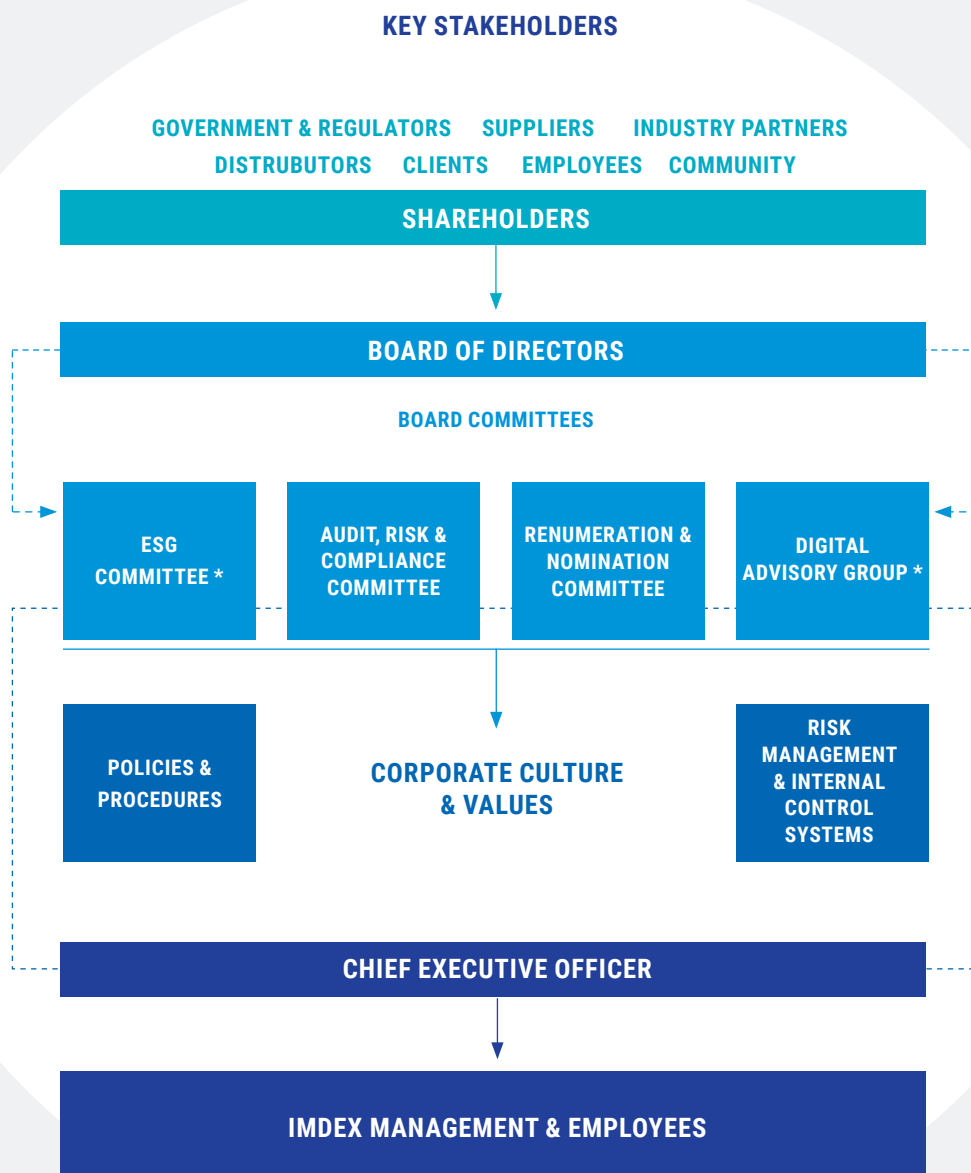
**80%
OF OUR TOP 100
CLIENTS HAVE
BEEN WITH IMDEX
FOR >5 YEARS**



OUR GOVERNANCE, STRUCTURE & STAKEHOLDERS

We are committed to providing all our stakeholder groups with transparent and genuine engagement to enhance and support their experience with our products and business globally. Sharing information about our work to manage potential modern slavery risks is a key element of this engagement.

The IMDEX Board of Directors is ultimately responsible for our modern slavery response. The ESG Committee and Audit, Risk and Compliance Committee support the Board by guiding our work to integrate modern slavery into our broader ESG work and incorporating modern slavery into our risk framework. On a day-to-day basis, our underlying policies and procedures and risk management controls provide the tools for us to identify and manage possible risks.



* These are not formally appointed Board Committees, but instead have Board and Management representation

OUR SUPPLY CHAIN

At IMDEX we manage a complex global supply chain for our product range.

We purchase raw materials and components through supply chains in Asia-Pacific, North America, South America, Europe and Africa.

Our supply chain covers the following critical areas to ensure continued success:

- Supply of raw materials and technical componentry for drilling optimisation products and rock knowledge sensors
- Manufacture of drilling optimisation fluids and rock knowledge sensors
- Fast turnaround prototyping for engineering and R&D
- Distribution and logistics to ensure rapid response to the changing needs of our clients
- Global service centres to support clients through online, remote and in-the-field support
- Procurement of products to support our operations, such as uniforms, protective equipment, vehicles and cleaning and security services.

In FY21, over 2,400 suppliers were directly engaged (Tier 1) with a total spend of over \$158 million.

We aim to create economic opportunities in the regions in which we operate through local employment and the procurement of local products and services.

During FY21 more than 90% of our purchases were with local suppliers (suppliers that operate within the relevant country IMDEX operates within).

All procurement figures represent the spend with our Tier 1 suppliers and may not represent the source country of these goods. We are working to improve our understanding of all suppliers in our supply chain, including beyond Tier 1.

COVID-19 has placed additional pressure on our supply chain, notably longer delivery times and increased freight charges. The resilience of our supply chain allowed us to work closely with our suppliers to adjust sourcing volumes, locations and logistics to ensure our clients were not materially impacted. While we have been able to manage COVID-19 related pressures on our supply chain, we recognise that the pandemic has increased modern slavery risks for vulnerable workers in global supply chains more broadly. During FY21, no material changes were made to our supply chain.



>2,400
TIER 1
SUPPLIERS



>90%
LOCAL
SUPPLIERS

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MODERN SLAVERY RISKS

OUR RISK EXPOSURE

We identify and assess modern slavery risk as part of our business-as-usual risk management process.

Our risk framework was established by our Board of Directors and is overseen by the Board's Audit, Risk and Compliance Committee. Risk is managed in accordance with policies and procedures aligned to the global ISO 31000 risk management standard.

Group-level sustainability and global social responsibility risks, including risks relevant to modern slavery, are recorded in our IMDEX Enterprise Risk Register. Our IMDEX Risk & Compliance Team assists the IMDEX Executive Committee to manage and monitor enterprise risks.

Operational risks, including in relation to modern slavery, are identified and managed by business units in accordance with IMDEX policies and procedures. Our Human Resources Team monitors risks relevant to modern slavery including employee rights and welfare. Our Supply Chain Teams monitor the risk of modern slavery in our global supply chain.

OUR WORKFORCE RISK

We have inherently low risk exposure to modern slavery in our direct workforce due to the nature and location of most roles, which are typically less vulnerable to modern slavery.

As a leading global Mining-Technology company, the majority of our roles require specialist training, skills and experience. Examples include engineers, software developers, technicians, sales, human resources, ICT support, data and cyber security and accounting.

Our workforce is concentrated in countries that are generally not at high-risk of modern slavery including Australia, Canada, Chile, Germany, South Africa, the United Kingdom and the United States of America (USA).

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OUR SUPPLY CHAIN RISK

We develop and manufacture our product offering at facilities in Africa, the Americas, Asia Pacific and Europe using components and materials sourced from around the world.

Many of the products procured by our businesses globally are sourced from our other IMDEX businesses. For example, our rock knowledge sensors are manufactured in Australia and the USA. Similarly, our drilling optimisation fluid products are blended or manufactured at regional hubs for distribution to our other IMDEX businesses.

Some potential exposure to modern slavery risk exists through suppliers providing raw materials, equipment parts, electrical componentry and services to our owned and operated manufacturing facilities and other areas of our business that may be produced or delivered using modern slavery.

We use reports published by the United Nations and reputable human rights groups to guide identification of modern slavery risks in our supply chain. Some of the areas of potential exposure are included in Table 1. We also recognise that we may be exposed to modern slavery risks through the procurement of goods and services to support our non-manufacturing operational activities, such as IT equipment for our offices and personal protective equipment and uniforms for our workforce, as well as cleaning and security services.

Agriculture & primary industries

Drilling fluids contain agricultural and other primary industry products, such as cotton products to prevent fluid loss during drilling.

Public reporting suggests that cotton and food industries may be vulnerable to modern slavery in regions such as South and Central Asia.

We source from a small number of suppliers in this category. We currently have no Tier 1 suppliers for this category in these higher risk regions but recognise that there is a risk our Tier 1 suppliers may source products from sub-suppliers in higher risk regions.

Electronic Components

Rock Knowledge Sensors contain electronics components.

Public reporting suggests that electrical, electronic and computing component industries may be vulnerable to modern slavery in regions such as East and Southeast Asia.

We source from a small number of suppliers in this category. We currently have no Tier 1 suppliers for this category in these higher risk regions but recognise that there is a risk our Tier 1 suppliers may source products from sub-suppliers in higher risk regions.

Extractive Industries

Other IMDEX products use raw materials from extractive industries: such as lithium batteries (containing cobalt) and bentonite.

Public reporting suggests that extractive industries may be vulnerable to modern slavery in regions such as Africa, South Asia and East Asia.

We source from a small number of suppliers in this category. We currently have no Tier 1 suppliers for this category in these higher risk regions but recognise that there is a risk our Tier 1 suppliers may source products from sub-suppliers in higher risk regions.

Table 1 - IMDEX Potential Exposure to Modern Slavery Risks

ACTIONS TO ADDRESS MODERN SLAVERY RISKS

OUR APPROACH TO THE ENVIRONMENT, SUSTAINABILITY AND GOVERNANCE

We are committed to enhancing disclosure and accessibility of information relating to our impacts on the economy, environment and society that indicate our contribution to sustainable development, including in relation to modern slavery.

During FY21 our ESG Committee developed IMDEX's Sustainability Policy. The purpose of this Policy is to outline the commitment our Company has to practices, standards and technologies that support sustainable development.

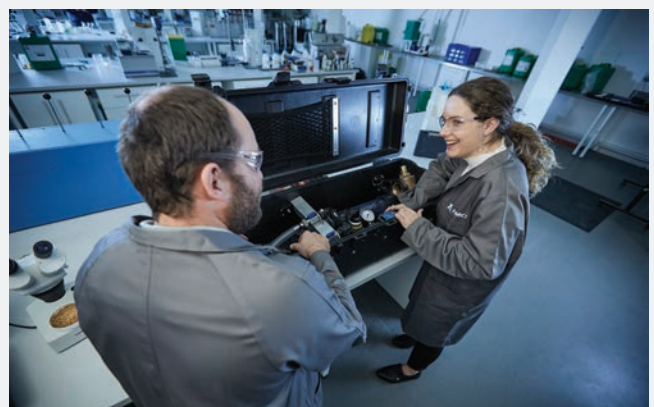
Upholding our Sustainability Policy is the responsibility of everyone engaged at IMDEX and applies to all directors, officers, contractors, and employees. Our Chief Executive Officer is accountable to the Board for the oversight of all sustainability matters in accordance with this Policy.

Our four key focus areas for ESG include creating a safe and inclusive global workforce, upholding and sustainable business practices, supporting economic development and driving the sustainability of the global minerals industry. Our work to address modern slavery risks supports each of these focus areas.



Creating a safe and inclusive global workforce

- Promoting diversity in the workplace and an inclusive culture across IMDEX.



Upholding ethical and sustainable business practices

- Conducting business in a manner that is ethical, values-driven and in compliance with the laws in all countries of operation.
- Ensuring activities and the organisations IMDEX works with are ethical and do not harm people or the environment.





Supporting economic development

- Maximising value and providing sustainable earnings growth.
- Increasing the accessibility of information regarding the Company's ESG related risks and opportunities for all stakeholders.



Driving the sustainability of the global minerals industry

- Developing products and technologies that provide additional value to clients' operations and ensure secure quality data.
- Collaborating with associations and research partners to enhance the safety and efficiency of mining processes.



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OUR RELEVANT CORPORATE POLICIES

The effective management of modern slavery risk and prevention of modern slavery, child labour, and other abuses of human rights supports ESG focus areas and is underpinned by our corporate policies included in Table 2.

These policies are communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.

POLICY	APPLICATION TO MODERN SLAVERY	IMPLEMENTATION OF IMDEX POLICY
IMDEX Code of Conduct	Ensures employee awareness and commitment to respecting human rights and zero tolerance for modern slavery.	Employees complete a formal online training module through IMDEX Academy, with period refresher training.
https://www.imdexlimited.com/media/home/Imdex-Code-of-Conduct-Policy-English-June-2021.pdf		
Supplier Code of Conduct	Ensures supplier awareness and commitment to zero-tolerance for modern slavery in the supply chain.	Suppliers are asked to review and confirm their commitment to the Code of Conduct through onboarding processes.
https://www.imdexlimited.com/media/home/IMDEX-Supplier-Code-of-Conduct_November2021.pdf		
Compliance Policy	Communicates the importance of compliance to our workforce and establishes the expectation to comply with relevant laws (which includes laws relevant to modern slavery).	This policy is communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.
https://www.imdexlimited.com/media/home/Compliance-Policy-September-2019-English.pdf		
Sustainability Policy	Establishes the commitment of IMDEX to corporate social responsibility and sets goals for improving sustainability.	This policy is communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.
https://www.imdexlimited.com/media/home/IMDEX-Sustainability-Policy_2021_v1.pdf		
Speak Up Policy	Establishes the procedures and processes through which confidential and anonymous reports of misconduct (such as modern slavery) can be made.	This policy is communicated through training sessions and routine communications from the IMDEX Legal Team and Risk & Compliance Team.
https://www.imdexlimited.com/media/home/Speak-Up-Policy-English-June-2021.pdf		

Table 2 - IMDEX Corporate Policies to Support Prevention of Modern Slavery

More policy information is available on our website at <https://www.imdexlimited.com/about-us/corporate-governance>

RISK MANAGEMENT

OUR RISK MANAGEMENT APPROACH

Identified risks are managed in accordance with our IMDEX policies and procedures within the risk framework set by our Board and Executive Committee.

The risk of modern slavery within our workforce is managed by our Human Resources Team. Standards are set by our Company for lawful and ethical practices in recruitment, employment and management of employees and contractors. Members of our Human Resources Team are embedded within all operations to lead compliance with these standards.

THE FOLLOWING CONTROLS ARE USED TO MITIGATE THE RISK OF MODERN SLAVERY IN OUR WORKFORCE:

Recruitment processes follow documented policies and procedures which comply with local laws. Oversight is provided by our Human Resources Team.

Under-age candidates (identified by the relevant legal standard in the jurisdiction) are not considered for employment (including traineeships and internships).

Written contracts are provided for workers in a language they understand describing their wages, hours of work, and conditions of employment.

Our Company **does not retain identity documents** or impose penalties which could prevent workers from leaving their employment.

Wages are carefully matched to benchmarks for worker roles and industries and are regularly reviewed. Relevant local legislative minimum wages are met or exceeded.

We **do not charge internal fees or withhold wages** other than in compliance with local taxation and employee entitlements legislation.

Grievances can be raised by employees with their line manager, an IMDEX Human Resources Team representative, or confidentially using our IMDEX Speak-Up platform.

Where conditions do not meet minimum standards, appropriate action is taken: including disciplinary action or reporting to local authorities (where appropriate) if misconduct is identified.

The **IMDEX Code of Conduct** sets a binding standard of behaviour which all directors, officers, managers, employees and contractors must follow.

The risk of modern slavery in our supply chain is managed by IMDEX Supply Chain Teams in the Asia-Pacific, North America, South America, Europe and Africa regions. Suppliers are appointed through an onboarding process and managed on an ongoing basis by the relevant Supply Chain Team. IMDEX has established a zero-tolerance position on modern slavery in the supply chain, and this is clearly communicated to suppliers through their engagement with us.

THE FOLLOWING CONTROLS ARE USED TO MITIGATE THE RISK OF MODERN SLAVERY IN THE SUPPLY CHAIN:

Procurement follows documented procedures and is carried out in accordance with the IMDEX Code of Conduct. Oversight is provided by the IMDEX Supply Chain Teams. Training is incorporated into our Code of Conduct, which has recently been updated and being rolled out company-wide in FY22.

Supplier prequalification and onboarding processes are used to evaluate new suppliers, including in relation to modern slavery indicators..

Supplier due diligence is done on a targeted basis depending on risk factors such as country and supply category. Due diligence is done by IMDEX with the support of third-party screening too.

Suppliers are audited where due diligence identifies a risk of modern slavery exposure. One supplier was audited in FY21 in an announced audit by an independent auditor.

Supplier performance and compliance with our standards (including in relation to modern slavery) is monitored by members of our Supply Chain Team.

Any employee can report suspected modern slavery relating to a supplier to their line manager, an IMDEX Legal Team representative, or confidentially using the IMDEX Speak-Up platform.

The IMDEX Supplier Code of Conduct sets a binding standard of behaviour which all suppliers are expected to follow. Suppliers are required to observe IMDEX's zero-tolerance position on modern slavery. IMDEX does not currently require that direct suppliers provide certification that materials supplied comply with local laws on modern slavery.



OUR REMEDIATION PROCESS

We investigate all reports of potential non-compliance or misconduct.

Potential modern slavery incidents can be reported to us by the victims or others acting on their behalf, such as a civil society organisation. Reports can be made to line managers or members of the Executive Committee, Human Resources, Supply Chain Team or IMDEX Legal.

Potential modern slavery incidents can also be reported confidentially and anonymously via the IMDEX Speak-Up online reporting portal, which is accessible to suppliers and their workers. We treat all reports made through our Speak-Up portal confidentially and do not tolerate reprisals or victimization of complainants.

Alleged modern slavery may also be discovered during our audits or routine performance monitoring activities.

No reports relating to modern slavery were received in FY21 or identified through audits or performance monitoring. If a complaint had been received, it would be referred to the IMDEX Legal Team for investigation. Referral to relevant authorities also would be made if a breach of the law appeared to have occurred. To the extent possible, we would also seek to provide support and protection to any suspected victims.

If a modern slavery complaint was substantiated, we would seek to provide for remediation in line with the expectations set out in the UN Guiding Principles on Business and Human Rights.

OUR MODERN SLAVERY FOCUS AREA

For the balance of FY22 and beyond, we will continue to enhance our capacity to prevent and respond to potential modern slavery risk in our global workforce and supply chains.

OUR FOCUS AREAS INCLUDE:

A review of our current due diligence processes (including third party tools) to improve visibility and management of potential modern slavery risk during supplier evaluation.

Updating our IMDEX Supplier Code of Conduct to improve supplier awareness and commitment to zero-tolerance for modern slavery.

Enhancing our IMDEX Purchase Orders to tighten terms and conditions, and reinforce supplier commitment to zero-tolerance for modern slavery.

EFFECTIVENESS & CONSULTATION

HOW WE ASSESS THE EFFECTIVENESS OF OUR ACTIONS

WE ARE COMMITTED TO CONTINUOUSLY ENHANCING OUR PROCESSES

As set out in our Risk Management Policy, we understand an effective response to risks such as modern slavery is based on internal control systems that identify and meaningfully mitigate or control the relevant risks.

We regularly review whether our existing risk controls are fit for purpose and aim to continually enhance our existing processes and procedures. For example, we plan to review our current due diligence processes to improve visibility and management of potential modern slavery risks during supplier evaluation.

More broadly, we monitor the overall effectiveness of our modern slavery response through our ESG Committee and Audit Risk and Compliance Committee. This whole-of-business oversight is complemented by audits of specific suppliers to help us understand whether they are effectively implementing our requirements for suppliers.

Importantly, our Speak-Up mechanism provides a tool for us to receive feedback from workers and suppliers about potential labour rights issues, which can help us to understand the effectiveness of our controls and identify potential areas for further work.



HOW WE CONSULT WITH OWNED AND CONTROLLED ENTITIES

This Statement has been prepared by IMDEX in consultation with all owned or controlled entities (entities).

The following methods of consultation were used:

- The IMDEX Risk & Compliance Team worked with the relevant operational teams across each entity/key entities to collate information.
- Risk management methods and issues were discussed and confirmed with our Human Resources Team and our Supply Chain Managers for Asia-Pacific, North America, South America, Africa, Europe and Global Procurement, which provide support to owned and controlled entities.
- General Managers and other senior management for each entity reviewed and contributed to this Statement.
- Directors and Officers for each entity reviewed and endorsed this Statement.



ANNEX A

COMPLIANCE WITH THE MODERN SLAVERY ACT 2018

MODERN SLAVERY ACT 2018 (NO 153 OF 2018)		RELEVANT HEADING(S)	PAGES
s16(1)a	Identifies the reporting entity	About This Statement	4
s16(1)b	Describes the structure, operations and supply chain of the reporting entity	Business Overview	11-15
s16(1)c	Describes the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities that the reporting entity owns or controls	Modern Slavery Risks	17-19
s16(1)d	Describes the actions taken to assess and address modern slavery risks, due diligence processes, and remediation processes for operations and supply chains	Actions to Address Modern Slavery Risks	20-27
s16(1)e	Describes how the effectiveness of actions is assessed	Effectiveness & Consultation	28-29
s16(1)f	Describes the process of consultation with any entities that the reporting entity owns or controls	Effectiveness & Consultation	28-29
s16(1)g	Includes any other information that the reporting entity considers relevant	Throughout	3-30
s16(2)a	Includes the details of approval by the principal governing body of the reporting entity	About This Statement	4

Table 3 - Table of Compliance with Modern Slavery Act



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www.imdexlimited.com