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#### **FEEDBACK**

We welcome questions and feedback regarding this Statement. Please visit www.draglobal.com/contact to provide feedback.

#### ACKNOWLEDGEMENT OF COUNTRY

DRA acknowledges and pays respect to all Traditional Owners and First Nation People that accommodate our operations around the world.

### **ABOUT THIS STATEMENT**

This Modern Slavery Statement ('Statement') has been prepared to meet the requirements of both the Australian Modern Slavery Act 2018 (Cth) ('Modern Slavery Act') and the United Kingdom Modern Slavery Act 2015 (UK) for the reporting period 1 January 2024 to 31 December 2024 ('FY24').

All references to our, we, us, the Group and DRA refer to the activities of DRA Global Limited (ABN 75 622 581 935) and all its controlled entities. Our reporting entities covered by this joint Statement are set out in Appendix 1. Material subsidiaries of DRA that are covered by this report are listed in Appendix 2.

This Statement reports on the risks of modern slavery in DRA's operations and supply chains, as well as the actions DRA has taken to address those risks.

Mandatory reporting criteria as required under the Modern Slavery Act is provided in Appendix 3.

All dollar figures are in Australian dollars unless stated otherwise.

### THE GLOBAL LANDSCAPE OF MODERN SLAVERY TODAY

Modern slavery remains a pervasive global challenge. While its forms, such as forced labour, human trafficking and debt bondage, continue to evolve, their impact is no less devastating.

While growing awareness and regulatory reforms, such as due diligence legislation in Australia, the United Kingdom, and the European Union, have catalysed progress to reduce or eradicate slavery, enforcement remains uneven, and systemic exploitation persists, particularly in high-risk regions and complex, multi-tiered supply chains.

As a global EPCM business operating across the mining and minerals value chain, DRA acknowledges its role and responsibility in this evolving landscape. Our operations intersect with sectors and jurisdictions vulnerable to human rights risks, making it imperative that our response goes beyond compliance. Guided by the United Nations Guiding Principles on Business and Human Rights and our Sustainability Strategy, we continue to embed human rights due diligence into our procurement, supplier engagement, and risk governance processes.

We recognise that meaningful progress requires sustained leadership, transparency, and collaboration, both with our clients and with the communities where we operate. While the path forward is complex, DRA remains committed to being part of the solution by aligning ethical practice with commercial excellence and sustainable value creation.

The journey is ongoing and we are committed to being part of the solution

#### INTEGRATING SAFETY AS A HUMAN RIGHTS AND ANTI-MODERN SLAVERY PRINCIPLE

We recognise that unsafe or exploitative working conditions are often early indicators of modern slavery and broader human rights violations. By embedding proactive safety leadership, risk-based oversight, and grievance mechanisms throughout our operations and supply chain, we actively prevent coercive, inhumane, or unlawful labour conditions. This includes remote auditing protocols, worker feedback channels, and site-level performance monitoring.

Beyond physical safety, we understand that truly sustainable operations require systems that uphold equity, inclusion, accountability, and economic opportunity. These values are embedded across our four strategic pillars:

- Empowering talent through inclusive work environments, safety culture, and targeted training.
- Building a resource-efficient, low-carbon future by designing assets that are both safe and climate-resilient.
- Investing in communities and local supply chains to strengthen economic resilience and reduce exploitation risks
- Enabling strong governance and leadership that reinforces transparency, ethical conduct, and anti-slavery safeguards.

By uniting these principles under a single integrated sustainability framework, we enhance both human rights protection and operational excellence, ensuring that our projects leave a legacy of safety, opportunity, and trust.

#### CONSULTATION

The preparation of this Statement involved cross-functional consultation across DRA's corporate and regional structures, reflecting our decentralised governance model and commitment to embedding modern slavery risk management into business-as-usual processes.

The Board of Directors and Executive Committee provided oversight and strategic direction, while operational and functional leaders contributed insights and validation through their roles in risk, compliance, legal, procurement, human resources, health and safety, finance, and sustainability.

Subject matter experts from across our Projects and Operations divisions were consulted to ensure alignment with DRA's commitments, standards, and broader sustainability framework. Regional consultation was also undertaken to reflect contextual risk environments and ensure the relevance of due diligence mechanisms across all jurisdictions in which we operate.

This collaborative process reinforces our commitment to accuracy, accountability, and continuous improvement.

#### COMMITMENT

At DRA, people are at the heart of our business, and our commitment to human rights is both a moral imperative and a business priority. We believe that dignity, fairness, and freedom are non-negotiable, and that no form of modern slavery has any place within our operations, supply chains, or influence.

Our commitment is grounded in action. Guided by our Sustainability Strategy and supported by our Code of Conduct, Supplier Code of Conduct, Human Rights and Modern Slavery Standard and Risk Management Framework, we have embedded human rights protections into core business processes, from engineering and procurement to risk governance and supplier engagement. Our due diligence systems, operational readiness planning, remote auditing protocols, and grievance mechanisms ensure early risk detection and ongoing responsiveness.

This commitment spans our strategic pillars: we protect workers and enable opportunity through our empowering talent agenda; strengthen ethical supply chains through regional procurement and local content support; and uphold transparency and accountability through our governance and risk frameworks. These are not standalone initiatives; they are core to how we create sustainable value for clients, communities, and investors.

As our industry and sector evolves and expectations rise, we remain committed to continuous learning and collective leadership. We will continue working alongside clients, partners, and communities to help build value chains that are ethical, inclusive, and resilient, ensuring that opportunity is never gained at the cost of another's freedom.

This Statement was approved in June 2025 by the Board of Directors of DRA Global Limited and its controlled entities.

James Smith

Chief Executive Officer and Managing Director

Sam Randazzo

Independent Non-Executive Director and Chairman



### **OUR WORK**

We operate across two divisions – Projects and Operations – within three regions.



Our core business focuses on delivering services to a diverse client base, from junior miners to global Tier-1, multi-commodity clients exclusively in the mining, minerals and metals sector.

#### PROJECTS DIVISION

DRA Projects provide mine-to-port operational services across our regions specifically for the engineering design, project management and construction management of mine assets.

Our team of talented professionals draw on comprehensive knowledge and extensive experience to deliver fit-for-purpose engineering solutions. From scoping and prefeasibility to final handover, in addition to interim or ongoing operations and management, our people add value across the entire lifecycle of a project.

Our design capabilities and excellent project management skills ensure the successful implementation of projects across multiple countries, commodities and sectors.

#### OPERATIONS DIVISION

As companies look for innovative ways to reduce operating and maintenance costs and improve productivity, DRA Operations offer a unique business model for mineral processing throughout the world.

We are a leader in this sector, adding value to mining operations by meeting the unique needs of our clients.

From coal, chromite, and ferrous metals, to diamonds, gold, and platinum group metals, we offer a wide range of services designed to make mineral processing requirements more cost-effective while maintaining product quality, plant integrity and worker safety.

#### **OUR SERVICES**

Our business model covers the full project lifecycle, offering optimal solutions that are tailored to meet clients' needs.





### ORIGINATE PROJECT DEVELOPMENT

- · Early phase gap analysis
- Mineral economics evaluation and advisory
- Concept development
- · PEA, PFS and FS studies
- · Test work management
- Project development
- · Trade-offs
- Estimation and planning
- · Project risk assessment

#### DELIVER PROJECT DELIVERY AND EXECUTION

- FEED design
- Multi-discipline detailed engineering and process design
- · Procurement and logistics
- Detailed design
- Project management
- Construction (SMP, E&I) management
- Commissioning
- · Commercial contract management
- · Capital portfolio delivery

### OPTIMISE OPERATIONS AND MAINTENANCE

- Operations and maintenance
- · Operational readiness
- Management and data systems
- · Asset integrity and life extension
- Brownfields improvements and modifications
- Sustaining capital
- · Debottlenecking and optimisation
- · Sustainability solutions

## **GEOGRAPHICALLY DIVERSE**

Although our roots are in Africa, we have emerged as a global player covering all major mining jurisdictions and all significant commodities. We now operate across five continents and undertake projects throughout the world.



#### **COMMODITIES**-

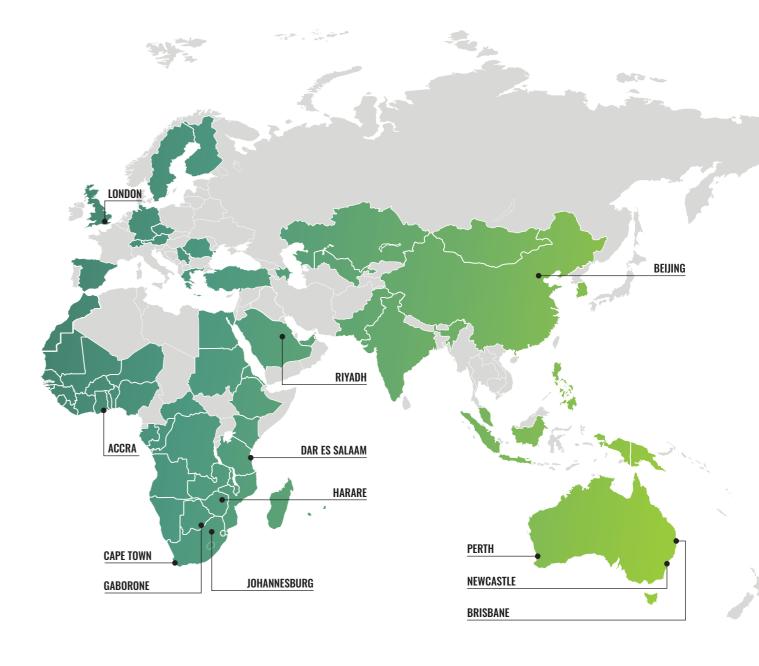
- Precious metals
- Base metals
- Rare Earths
- · Bulk commodities
- Precious stones
- Thermal and metallurgical coal
- · Battery minerals
- Nuclear fuels
- Industrial minerals
- Mineral sands

#### **CAPABILITIES**

- Minerals and metals processing
- Mining
- · Non-process infrastructure
- Construction management
- Electrical, control and instrumentation
- Water
- Energy
- Engineering

Advisory

Operations and maintenance



# STRENGTHENING ETHICAL AND INCLUSIVE SUPPLY CHAINS

At DRA, our supply chain is not only a mechanism for project delivery. It is also a platform for creating a lasting, positive impact. We are committed to upholding human rights, advancing ethical sourcing, and integrating sustainability into every tier of our procurement practices. In line with our values and modern slavery commitments, we proactively assess and manage supply chain risks while building transparent relationships with partners who share our standards.

We prioritise partnerships that align with our commitment to responsible business, favouring suppliers who demonstrate ethical conduct, environmental stewardship, and respect for labour and human rights. This approach enables us to deliver resilient, high-performing projects while contributing to broader goals of equity, accountability, and sustainable development.

#### SUPPLIER SPEND

We source a diverse range of goods and services, engaging with both small local enterprises and large international suppliers. In FY24, our procurement activities totalled \$342 million, supporting functions across engineering, project delivery and operations.

These purchases were made from 2,857 suppliers spanning 39 countries.

Our spend per operating segment and region is presented in Figures 1 and 2, respectively.

Figure 1: Supplier Spend by Operating Segment (as a % total supplier spend)

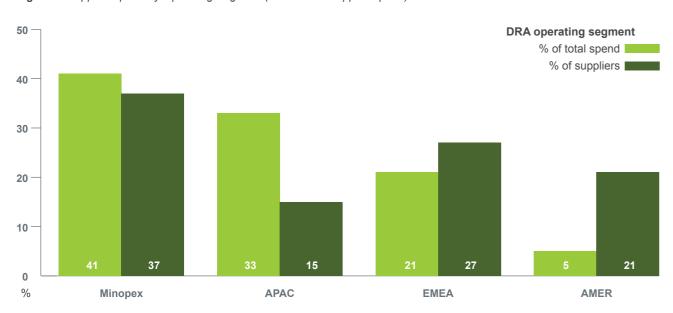


Figure 2: Supplier spend by global region (as a % of total supplier spend)

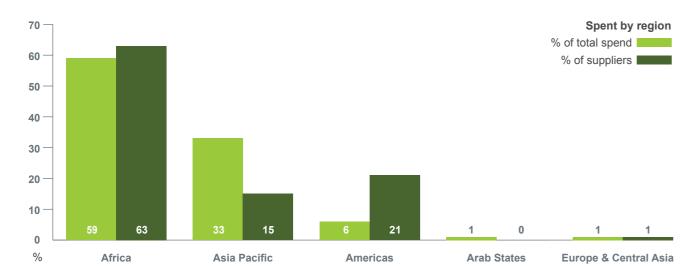
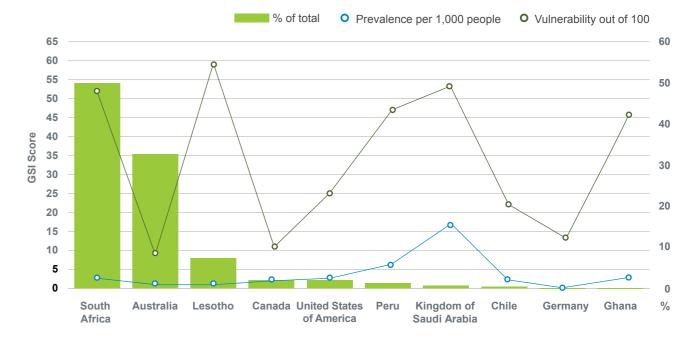


Figure 3 illustrates our top 10 sourcing countries by supplier spend in FY24, listed from highest to lowest. These countries account for 98% of total spend, with South Africa and Australia alone contributing 83%. The chart also includes each country's prevalence<sup>1</sup> and vulnerability<sup>2</sup> to modern slavery, based on data from the Global Slavery Index 2023<sup>3</sup>.

Figure 3: Top 10 Sourcing Countries by Supplier Spend



- 1. **Prevalence** refers to the estimated number of people living in modern slavery per 1,000 population in a given country. These estimates are based on survivor interviews and analysis of individual and country-level risk factors, including national vulnerability levels.
- Vulnerability refers to the underlying factors that make individuals or communities more susceptible to modern slavery. These are grouped
  into five key dimensions: governance issues, lack of access to basic needs, inequality, the marginalisation of specific groups, and the impacts
  of conflict.
- 3. Global Slavery Index Report 2023, Walk Free Foundation: https://www.walkfree.org/global-slavery-index/

#### **EMPOWERING LOCAL SUPPLIERS AND COMMUNITIES**

We recognise that local procurement is one of the most effective ways to support economic resilience, promote inclusive growth, and foster long-term community wellbeing. By sourcing goods and services from businesses based near our project sites, especially those in historically disadvantaged or under-resourced areas, we help create jobs, transfer skills, and stimulate local economies.

Beyond spend, our focus is on capacity-building and access. We work closely with community-based businesses to help them meet industry standards, offering training, supplier engagement events, and contract facilitation. This people-centred approach reflects our goal of enabling communities to become more self-sufficient, well-equipped, and actively involved in the success of the projects that shape their future.

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### ASSESSMENT OF MODERN SLAVERY RISK

DRA recognises that risk is inherent in our business, and effective risk management is critical to delivering our strategy and achieving our objectives. We have an established risk management process aligned to the International Standard for Risk Management AS/NZS ISO 31000:2018, which includes regular monitoring of internal and external factors affecting our business. Risks are reviewed and managed at strategic, operational, project, and functional levels.

#### ALIGNMENT WITH UNITED NATIONS GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

Our approach aligns with the United Nations Guiding Principles on Business and Human Rights. We assess how our activities may:

RISK CATEGORY	LIKELIHOOD	DESCRIPTION	CONTROL
	Risk assessment indicates a low likelihood of DRA causing modern slavery directly.	Direct practices or omissions causing modern slavery.	Employment practices, employment standards, contracts, training, grievance mechanisms.
CAUSE			
	Risk assessment indicates a low to moderate risk of DRA contributing to modern slavery via its procurement processes, such as contract structures, pricing pressure, and tight timelines.	Indirect contribution via procurement practices or pricing structures.	Procurement governance standards, policies, procedures and practices, procurement reviews, Supplier Code of Conduct, supplier due diligence.
CONTRIBUTE			supplier due diligence.
- <del>\</del>	Risk assessment indicates that DRA may be linked to indirect risks through its global supply chains, especially in weak governance jurisdictions.	Risks linked through suppliers, contractors or subcontractors.	Screening tools, audit plans, contractual clauses, training and awareness.
DIRECT LINK			

#### PRINCIPAL RISKS OF MODERN SLAVERY IDENTIFIED

We acknowledge that the mining industry as well as countries where we operate have the potential to impact human rights. A risk assessment has identified the following potential modern slavery risks for DRA.

WORKFORCE	RISK DRIVER	CURRENT CONTROL	FY25 RESPONSE PLAN
Use of high-risk labour contractors	Engagement of labour brokers and subcontractors with low transparency in employment conditions, documentation, and worker treatment.	Due diligence protocols applied to contractors, including basic verification of practices.	Enhancement through procurement screening questions, enhanced due diligence, integration into supplier onboarding and integration of applicable systems.
Remote project sites and limited auditing	Project sites in remote or inaccessible regions receive minimal physical oversight, increasing potential for unmonitored labour conditions.	Periodic oversight by project teams and informal reporting mechanisms.	<ul> <li>Implement remote auditing protocols and integrate risk-based site inspection schedules.</li> </ul>
Procurement practices and supply chain transparency	Reliance on indirect suppliers and multi-tier supply chains obscures labour practices, especially in third-tier suppliers.	Supplier Code of Conduct and general procurement policies.	<ul> <li>Develop enhanced supplier mapping and include modern slavery indicators in tender evaluations.</li> </ul>
Resource constraints in due diligence	Limited personnel and tools to conduct thorough and frequent supplier screenings; annual reviews insufficient for dynamic risks.	Annual screening cycle focused on high-risk geographies.	Implement rolling screening schedules and align automated third- party screening tool.

### **HUMAN RIGHTS GOVERNANCE**

Strong corporate governance is foundational to DRA's long-term success. The Board and Executive Committee are committed to upholding transparent, accountable, and values-driven governance that reflects our strategic objectives, operational integrity, and culture of responsible leadership. By embedding governance into every level of decision-making, from risk oversight to ethical conduct, DRA reinforces sustainable growth, stakeholder trust, and alignment with its long-term vision and values.

The Board of Directors holds ultimate responsibility for fostering a culture of ethics and integrity across the Group, as well as ensuring sound compliance and risk management. This includes the oversight of modern slavery risk governance. The Board is supported in this function by the Audit and Risk Committee, which monitors the effectiveness of internal controls, risk frameworks, and compliance systems.

Demonstrating its commitment to upholding human rights, the Board actively works to prevent and address any potential adverse impacts linked to our operations. It fully endorses the principles outlined in the United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights.

Operational responsibility lies with the CEO and Executive Committee, who are accountable to the Board for the practical implementation of governance processes. Our approach is grounded in a suite of key documents, including the Code of Conduct, Sustainability Policy, and the Human Rights and Modern Slavery Standard. Together, these form the foundation of our human rights management framework. An overview of our strategy to manage modern slavery risks is illustrated in *Figure 4*.

Figure 4: Approach to addressing modern slavery risk



#### **FRAMEWORK**

We maintain and implement a risk-based modern slavery governance framework, underpinned by a culture of integrity



#### **ASSESS**

We conduct due diligence to identify and assess modern slavery risks in our operations and supply chain



#### **MITIGATE**

We develop and implement appropriate mitigation measures to address risks



#### MONITOR AND REVIEW

We monitor and review the effectiveness of our modern slavery risk management framework and processes



#### **ENGAGE**

We raise employee awareness and train staff. We report internally and externally on modern slavery risks and actions taken to manage risks

The governance of modern slavery risks within our operations and supply chain is guided by a comprehensive set of policies, frameworks, and standards that articulate our commitment to human rights and define the expectations we hold for all stakeholders. These governance instruments are accessible to employees and suppliers via the company intranet and are reinforced through internal communications and targeted training programs.



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### **OUR POLICIES AND STANDARDS**

Our policy framework underpins our people practices, supports the delivery of our strategic objectives, and plays a critical role in fostering effective, ethical, and responsible decision-making and conduct across the business. At the heart of this framework is our Code of Conduct, which sets the standard for professional behaviour and emphasises the importance of acting with respect, integrity, and accountability in all we do.

All documents within the framework are subject to scheduled reviews in accordance with defined timeframes. These reviews are currently underway and serve as a key mechanism for identifying overlooked elements, addressing emerging risks, and resolving issues that may have contributed to gaps in reporting or compliance. This ongoing refinement ensures our governance instruments remain fit for purpose and responsive to our evolving risk environment.

POLICY / STANDARD	PURPOSE	FY25 STATUS
Code of Conduct	Guides ethical behaviour and human rights compliance	Reviewed and operational
Supplier Code of Conduct	Sets supplier expectations regarding labour and ethics	Operational and finalising revisions
Human Rights and Modern Slavery Standard	Details response processes and due diligence	Operational and finalising revisions
Procurement Standard and Sanctions Compliance and Business Partner Due Diligence Standard	Ensures governance and risk screening in procurement practices and when engaging in business relationships.	Reviewed and operational
New / Re-Entry Country or Jurisdiction Standard	Establishes risk assessment requirements before entering or re-entering foreign markets, using modern slavery risk indicators as part of the evaluation.	Operational and finalising revisions
Respectful Workplace Policy and Standard	Sets clear expectations for workplace behaviour, prohibiting bullying, discrimination, harassment, and outlines consequences for violations.	Reviewed and operational
Inclusion and Diversity Policy and Standard	Confirms DRA's commitment to an inclusive and diverse workplace, promoting equal opportunity and outlining mechanisms for addressing unfair treatment.	Reviewed and operational
Grievance Handling and Dispute Resolution Standard	Provides a structured process for resolving workplace grievances promptly and fairly to maintain a healthy work environment.	Reviewed and operational
Risk Management Policy and Framework	Guides the proactive identification and treatment of business risks, including human rights risks, and outlines oversight by management and the Board.	Operational and finalising revisions
Speak-Up Policy and Standard	Enables reporting and whistleblower protections	Operational and finalising revisions

Further information about corporate governance at DRA, as well as copies of our Board and Committee Charters, Code of Conduct and various polices can be found at www.draglobal.com



### **EVALUATING EFFECTIVENESS**

DRA is committed to the continuous improvement of its modern slavery risk management processes. We regularly evaluate and assess the impact of our actions and look for ways to better detect and address the potential of modern slavery in our operations and supply chain across the Group. We evaluate and report to the Board and the Audit and Risk Committee on a regular basis, with relevant data, on the steps we take to prevent the risk of modern slavery in our activities or supply chain. This supports the assessment of the effectiveness of the measures we have undertaken, including governance measures, due diligence activity, any reports of modern slavery risks and employee training.

During FY24, there have been no known incidents, reports or significant risks of modern slavery identified within our operations or supply chain.

## PROGRESS ON OUR COMMITMENT TO HUMAN RIGHTS

In 2023 and continuing into 2024, DRA made significant progress in strengthening its commitment to human rights by enhancing our operating model and governance processes.

A key focus has been decentralising oversight and embedding accountability for compliance and human rights obligations within each business unit. This shift has enabled more responsive, locally attuned management of risks, with each unit now directly responsible for identifying, managing, and addressing potential human rights impacts.

Across all business units, dedicated resources are now in place to ensure these responsibilities are met. Additionally, we have advanced our due diligence efforts and plan to review and refine our screening tools in FY25/26 to ensure they are robust, scalable, and effective in supporting quality assurance.

COMMITMENT	STATUS	TARGET DATE
Publish updated governance Standards		Q3 FY25
Roll out revised/updated employee training on our Code of Conduct and Human Rights and Modern Slavery Standard.		Q4 FY25
Extend Human Rights and Modern Slavery training to selected suppliers in DRA's supplier base		FY26
Evaluation of current screening tools and processes to ensure effectiveness, with a focus on improving quality assurance, usability, and scalability. This includes assessing opportunities to integrate screening data into existing supplier and business partner management systems.		Q4 FY25
Development of audit framework underway, which will include prioritisation criteria for remote locations and high-risk suppliers, with phased rollout planned from Q4 FY25.		Q4 FY25
Launch KPI dashboard for (including, but not limited to):  • % of high-risk suppliers/ remote locations audited  • % training completion across business units  • % training completion across selected suppliers Number of grievances and/or Tip-Offs reported, and resolved		Q4 FY25
Develop a Group Procurement Standard that includes expectations of due diligence in accordance with DRA's Sanctions Compliance and Business Partner Due Diligence Standard.	•	Q3 FY24

### **APPENDIX 1: REPORTING ENTITIES**

The following entities within the DRA Group meet the threshold requirements of a reporting entity pursuant to the Modern Slavery Act and are covered by this joint Modern Slavery Statement. Both entities are incorporated in Australia with its registered office at 256 Adelaide Terrace, Perth, Western Australia.

Consultation has been undertaken with the following entities, Directors and senior management, including a review of this report.

NAME	ABN	% INTEREST
DRA Global Ltd	75 622 581 935	Listed holding company*
DRA APAC Holdings Pty Ltd	77 625 157 744	100%

<sup>\*</sup> As of 31 December 2024, DRA Global was dual-listed on the ASX and JSE, with its primary listing on the ASX. However, following its delisting in January 2025, DRA Global Ltd is no longer a listed company.

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### **APPENDIX 2: MATERIAL SUBSIDIARIES**

Material subsidiaries of DRA Global Limited, which are those with the most significant contribution to the Group's revenue during FY24 are as follows:

NAME	COUNTRY OF INCORPORATION	% INTEREST
Actinium SAS	Democratic Republic of Congo	49%
Al Abrar Advisory SARL	Morocco	100%
DRA Americas Inc. (Canada)	Canada	100%
DRA Americas Peru S.A.C	Peru	100%
DRA Pacific Pty Ltd	Australia	100%
DRA Operations (APAC) Pty Ltd	Australia	100%
DRA Projects Pty Ltd	South Africa	100%
DRA South Africa Projects Pty Ltd	South Africa	100%
DRA Saudi Arabia LLC	Saudi Arabia	100%
Minerals Operations Executive Pty Ltd	South Africa	100%
Minopex Lesotho Pty Ltd	Lesotho	100%
UMM Contracting Services Pty Ltd	South Africa	60%

# APPENDIX 3: DISCLOSURE INDEX OF MANDATORY STATEMENT CRITERIA

The table below indicates the location of the disclosure within this statement of the mandatory reporting criteria, as set out in section 16 of the Modern Slavery Act.

MANDATORY REPORTING CRITERIA	LOCATION
Identify the reporting entity.	Page 2
Describe the Reporting Entity's structure, operations and supply chains.	Pages 5-11
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Pages 12-13
Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Pages 14-16
Describe how the reporting entity assesses the effectiveness of these actions.	Page 18
Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Pages 2 and 19
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A

