



# 2022

## MODERN SLAVERY STATEMENT



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# ABOUT THIS STATEMENT

This Modern Slavery Statement by DRA Global Limited is prepared pursuant to the Australian Modern Slavery Act 2018 (Cth) (“**the Modern Slavery Act**”) for the reporting period 1 January 2022 to 31 December 2022 (“**FY2022**”) and sets out the DRA Group’s risks of modern slavery in our operations and supply chains, and the actions taken to assess and manage these risks.

The Modern Slavery Act imposes a reporting requirement on large corporate entities with an Australian presence that meet an annual consolidated revenue threshold to prepare and publish an annual modern slavery statement. While this statement covers the activities of DRA Global Limited and all its subsidiaries (collectively referred to as “**DRA**” or “**the Group**”), the entities that are considered reporting entities pursuant to the Modern Slavery Act and covered by this joint statement are listed in **Annexure A**.

Material subsidiaries of DRA, and covered by this report, are listed in **Annexure B**. On 10 September 2022, DRA completed the sale of business of its Australian subsidiary, G&S Engineering Services Pty Ltd. This statement only applies to the operations of G&S Engineering Services for the FY2022 period up to the completion date of the sale.

The Board of Directors for the reporting entities covered by this statement and the senior management teams across the Group were actively engaged and consulted during its preparation. The consultation included a briefing on the requirements of the Modern Slavery Act, the consideration of the measures to identify and mitigate the risks of modern slavery, the actions planned as part of the Group’s continuous improvement agenda and a review of this statement.

The location of the disclosure within this statement of the mandatory reporting criteria, as required under the Modern Slavery Act, is provided in **Annexure C**.

We welcome your questions and feedback regarding this statement. Please direct your queries to [complianceofficer@draglobal.com](mailto:complianceofficer@draglobal.com)

# WHAT IS MODERN SLAVERY?

Modern slavery is a crime that affects every country across multiple sectors. It refers to situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour (as per the International Labour Organization Convention No. 182 of 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour).

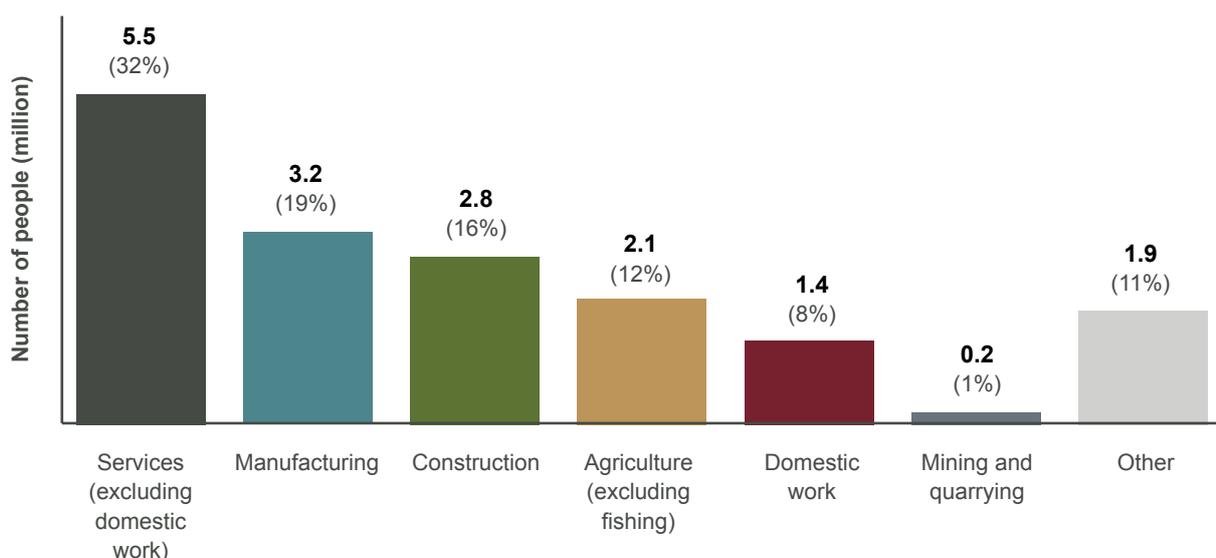
Modern slavery is a term used to describe serious exploitation, and not used to refer to unacceptable or harmful labour practices like substandard working conditions or underpayment of workers, although these may be present in some situations of modern slavery.

The Global Estimates of Modern Slavery Report<sup>1</sup>, issued in September 2022, indicates that in 2021 there were 49.6 million people living in situations of modern slavery, either forced to work against their will or in a marriage that they were forced into. Forced labour accounts for 27.6 million of those people in modern slavery. This represents a significant increase from the previous estimate of 40.3 million people in 2016, as per The Global Slavery Index 2018<sup>2</sup>, which was driven entirely by private sector imposed forced labour.

The Global Slavery Index, issued by the international human rights organisation Walk Free, provides comprehensive data on modern slavery. DRA uses it as a measure to assess the risk of modern slavery in a particular country. Other key findings in the report, and of relevance to any business, include:

- **No region of the world is spared from modern slavery.**  
There is an increased prevalence of modern slavery across all regions of the world.
- **Modern slavery has permeated all parts of the private economy.**  
Five sectors account for the vast majority, approximately 87%, of adult forced labour, as illustrated in **Figure 1**.
- **There is an important gender dimension in the private economy.**  
Men are more vulnerable to threats of violence and financial penalties whereas women are more likely to be coerced through wage non-payment, abuse of vulnerabilities, physical and sexual violence and threats against family members.
- **Migrant workers face a higher risk of forced labour than other workers.**  
The forced labour prevalence of adult migrant workers is more than three times higher than that of adult non-migrant workers.
- **Children are also subject to forced labour demands.**  
A total of 3.3 million children are in situations of forced labour.

**Figure 1: Global distribution of adults in forced labour exploitation by industry**





“ RESPECT FOR HUMAN RIGHTS IS CONSISTENT WITH DRA GLOBAL’S VALUES OF SAFETY, INTEGRITY, EXCELLENCE, TRUST, COURAGE AND PEOPLE AND IS FUNDAMENTAL TO THE SUSTAINABILITY OF THE GROUP AND THE COMMUNITIES WHERE WE OPERATE. DRA IS COMMITTED TO RESPECTING HUMAN RIGHTS AND DOES NOT TOLERATE ANY FORM OF MODERN SLAVERY IN OUR OPERATIONS OR SUPPLY CHAIN. ”

*James Smith, Chief Executive Officer*

## MESSAGE FROM OUR CEO

Modern slavery continues to be a global issue across all sectors with severe consequences for its victims. At DRA, we acknowledge the increased risk of modern slavery in the construction and mining sectors where we predominantly work. We are committed to responsible business practices where all workers are treated fairly and respectfully, and we do not tolerate or accept any form of modern slavery in our business operations or supply chain.

The nature of our global business is wide-ranging across countries that have differing levels of prevalence and vulnerability to modern slavery. To address these risks, we have a range of governance measures to ensure the human rights of all our employees are respected and the risk of human rights violations, including modern slavery, in our operations and supply chain across the Group is identified, assessed and managed.

**We are continuously focused on improving our modern slavery risk management approach, and some of the key activities that were undertaken during FY2022 included:**

- Reviewed and amended our Sanctions Compliance and Business Partner Due Diligence Standard to support the implementation of a consistent, risk-based approach and supplemented by a standardised risk assessment methodology.
- Reviewed and amended our Speak Up Standard to provide greater clarity on roles and responsibilities, supporting processes and guidance on the effective assessment of reported matters.
- Delivered training sessions with management, business development, procurement and compliance teams on the revised business partner due diligence requirements.
- Undertook further risk-based due diligence of suppliers based in four countries with a higher risk of modern slavery.
- Commenced with the development of a country risk matrix, which includes metrics relating to human rights and modern slavery, to enhance the business’ understanding of country risks.
- Commenced with the incorporation of our Supplier Code of Conduct as part of the supplier onboarding process in the APAC region.

Through our governance measures and the continuous improvement thereof, which are outlined in more detail in this statement, we contribute to a world where all people are protected and treated with the respect that they so rightfully deserve.

**James Smith**  
Chief Executive Officer

# WE ARE DRA GLOBAL

## STRUCTURE AND OPERATIONS

DRA is incorporated in Australia as a public company limited by shares with business number ABN 75 622 581 935 and registered office at 256 Adelaide Terrace, Perth, Western Australia. DRA's primary listing is on the Australian Securities Exchange (ASX), with a secondary listing on the Johannesburg Stock Exchange (JSE) in South Africa.

We are a global multi-disciplinary engineering, project delivery and operations management group focused on the mining, minerals and metals industry. We have deep subject matter expertise in mining, minerals and metals processing and related non-process infrastructure including sustainability, water and energy solutions for the mining sector.

We deliver advisory, engineering and project delivery services throughout the capital project lifecycle from concept through to operational readiness and commissioning as well as ongoing operations and maintenance services.

Our workforce comprises approximately **4,000** employees throughout **14** offices across **11** countries. Key trading names across the DRA Group include DRA, SENET and Minopex.





## CREATING REAL VALUE

We are driven by our purpose to create real value by fulfilling the aspirations of our people, clients, shareholders, and communities. In other words, we exist to deliver long-term value to all our stakeholders.

## OUR BUSINESS MODEL

We operate across two distinct, but interconnected divisions, Projects and Operations, within three regional operating segments:

- Australia and Asia-Pacific (**APAC**);
- North and South America (**AMER**); and
- Europe, the Middle East and Africa (**EMEA**).

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

## PROJECTS DIVISION

DRA Projects services the mining, minerals and metals industry from mine-to-port across the APAC, AMER and EMEA regions, specifically for the engineering design, procurement, project 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 pre-feasibility to final handover, our people add value across the entire lifecycle of a capital project.

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

## OPERATIONS DIVISION

As companies look for innovative ways to reduce operating and maintenance costs and improve productivity, DRA offers a unique business model for mineral processing throughout the world. DRA is 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 and solutions to the mining, minerals and metals industry.

### People focused business model covering the full project lifecycle

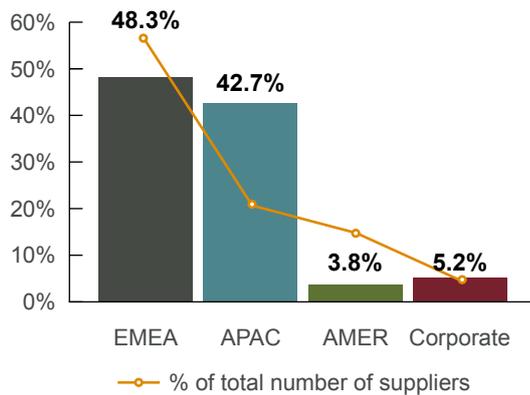


## SUPPLY CHAIN

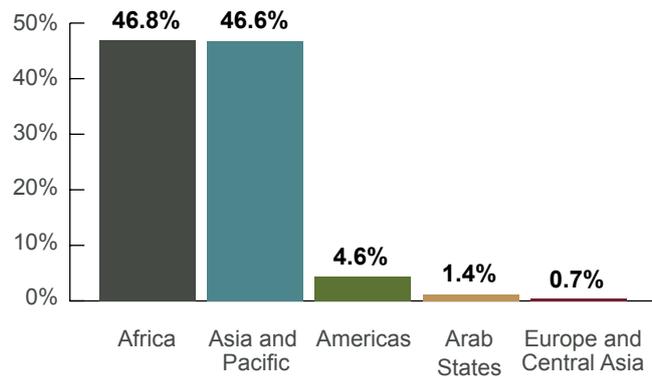
The quality of DRA's supply chain directly impacts our ability to deliver our services. We are committed to sound procurement practices by ensuring our supplier selection processes have set criteria, including the quality of goods and services, technical capability, timeliness of delivery, cost, adherence to safety, health and environmental requirements, any transformational objectives of the countries where we operate, and are aligned to our values and ethical standards. Where possible, we support local suppliers that operate businesses in the regions where we operate.

We operate in diverse markets with a global supply chain across a range of goods and services. During FY2022, the Group maintained a global supplier database of approximately 4,300 suppliers with a total expenditure equivalent to \$360 million. Our spend per operating segment and regional spend is presented in **Figure 2** and **Figure 3**. The supplier spend reported in this statement is presented in Australian dollars and excludes employee payments (e.g. expense payments), individual contractors, taxes, inter-company spend and cash expenses.

**Figure 2: Supplier spend by DRA operating segment (as a % of total supplier spend)**

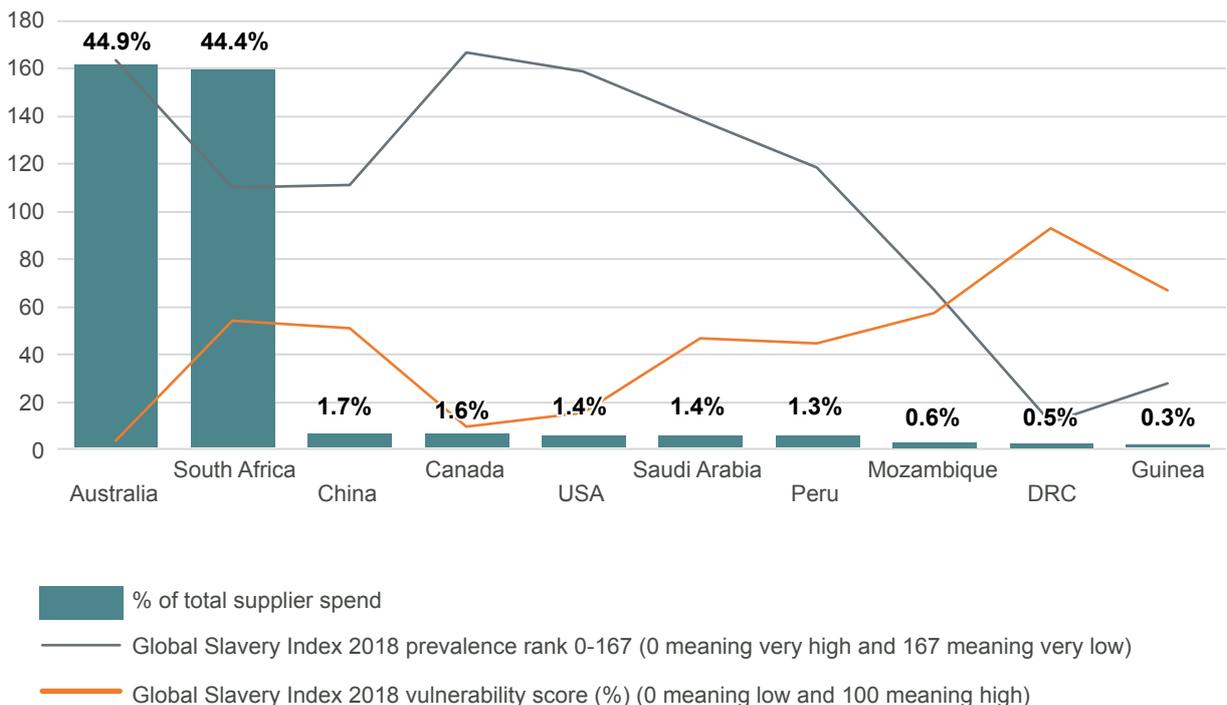


**Figure 3: Supplier spend by global region (as a % of total supplier spend)**



Our top 10 sourcing countries by supplier spend during FY2022, comprising 98% of total supplier spend and the vast majority from Australian and South African suppliers, as well as their corresponding prevalence and vulnerability to modern slavery as per the Global Slavery Index 2018<sup>2</sup>, is presented in **Figure 4**.

**Figure 4: Top 10 sourcing countries by supplier spend**



# ASSESSMENT OF MODERN SLAVERY RISKS

In order to identify and assess the risk of modern slavery within our operations and supply chain, we use a risk-based approach to determine how we could be at risk of:

- **causing** modern slavery directly through our operations (e.g. employing staff and subjecting them to exploitative working conditions or employing children in dangerous working conditions);
- **contributing** to modern slavery practices through our operations or supply chain (e.g. engaging a supplier who we know makes use of exploited labour, engaging in irresponsible procurement practices by setting unrealistic cost targets for a supplier that can only be met by using exploited labour, or enabling or facilitating the engagement of exploited people in a local community such as for domestic work); or
- **being directly linked** to modern slavery through another entity that we have a direct relationship with (e.g. making use of a contractor who has been assessed for modern slavery risks and subject to appropriate safeguards, but who subsequently makes use of subcontractors that make use of forced labour).

## RISKS WITHIN OUR WORKFORCE

The risk of directly causing modern slavery in our workforce is considered to be low. Our risk assessment process includes the consideration of multiple risk factors, such as:

- **country risks** (e.g. employees located in countries with a higher risk of modern slavery);
- **sector/industry risks** (e.g. employees in construction or mining roles); and
- **adequacy of governance** measures to secure sound employment practices and avoid forced labour risks (e.g. abusive working and living conditions, withholding of wages, physical and sexual violence, restriction of movement through retention of travel documents, intimidation and threatening behaviour or abuse of vulnerability).

The majority of our employees are employed directly and under permanent, fixed-term, part-time or casual contracts, or under enterprise or collective bargaining agreements, which significantly lowers the risk of modern slavery. All employment contracts meet the applicable employment legislation in the countries where we operate.

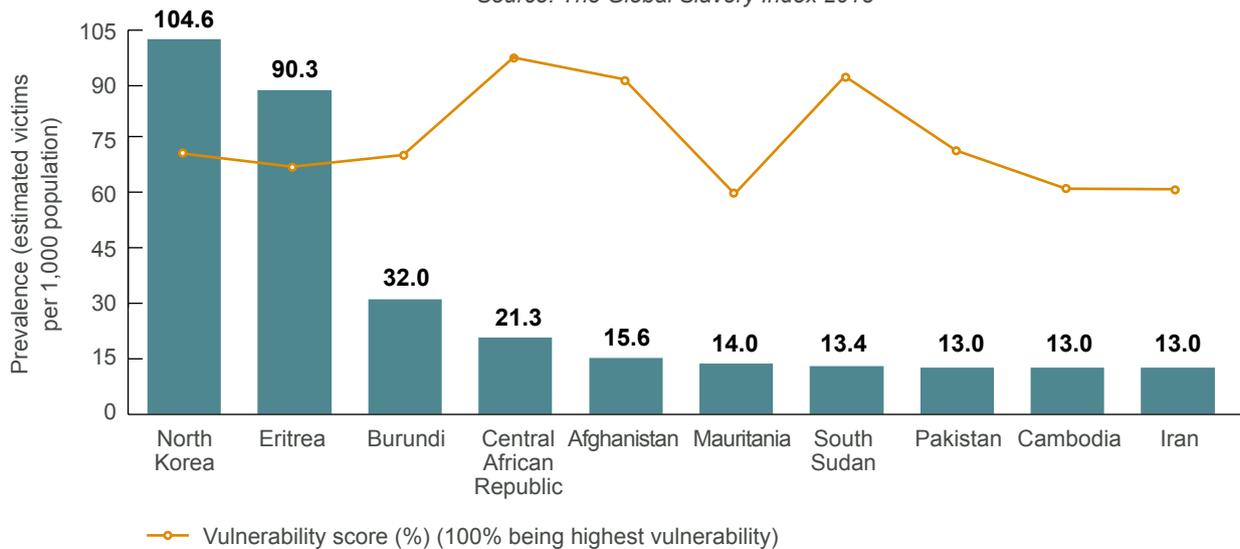
We recognise that project-related activities can pose a risk of modern slavery due to the high rates of employment of subcontractors and employment of lower-skilled workers, particularly in countries and sectors with a higher prevalence and risk of modern slavery. We manage this risk through various governance measures that are in place across the Group, as outlined in this statement, to provide a safe and respectful working environment.

Of our approximately 4,000 employees, no employees were based in any of the top 10 countries identified as having the highest prevalence of modern slavery, based on the country rankings included in the Global Slavery Index 2018<sup>2</sup>, as illustrated in **Figure 5**. Only 3.9% of employees were based in countries considered to be in the top 50 countries with the highest prevalence of modern slavery: Democratic Republic of Congo, Liberia and Zimbabwe.

We do not make use of child labour, do not prohibit our employees' freedom of movement and treat all employees equally, including any migrant workers.

**Figure 5: Top 10 countries with highest prevalence of modern slavery**

Source: The Global Slavery Index 2018



## RISKS WITHIN OUR SUPPLY CHAIN

With regards to the risk of modern slavery in our supply chain, our risk assessment process includes the consideration of multiple risk factors, including:

- **country risks** (e.g. suppliers in countries with high prevalence rankings and vulnerability to modern slavery and poor government response to modern slavery);
- **sector/industry risks** (e.g. suppliers in sectors making use of unskilled and temporary labour); and
- **entity risks** (e.g. suppliers with known human rights violations identified through our due diligence screening).

Through our Supplier Code of Conduct, we set out our expectations of suppliers and their management of the risk of modern slavery in their supply chain, which is supported through our various other governance measures. We have undertaken a due diligence screening of all our FY2022 suppliers across the Group for multiple risk factors including the risk of modern slavery through an external third-party risk management screening tool. The screening of our suppliers is periodically conducted until such time as it is fully integrated into our procurement process. While our current due diligence process is focused on our direct suppliers, we acknowledge there may be risks beyond our direct suppliers and we plan to incorporate this in the future on a risk-based approach.

We source suppliers from across the globe. To assess the risk of modern slavery in a particular country, we use an external country risk ranking tool, which supports the identification of multiple risk factors, including human rights, human trafficking and exploitative labour, as well as the Global Slavery Index 2018<sup>2</sup>.

The Global Slavery Index 2018<sup>2</sup> measures the extent of modern slavery by country and provides analysis of trade flows and data on specific products with an increased risk of modern slavery. This data supports businesses to better identify and respond to modern slavery risks and is used by DRA to aid in the assessment of modern slavery risk in our operations and supply chain.

During FY2022, further due diligence assessments were undertaken on a selection of suppliers in the Democratic Republic of Congo, Guinea, Peru and Saudi Arabia. Based on our assessment, no increased risks of modern slavery were identified in our engagement of these suppliers.

We did not operate in any of the top 10 countries with the highest prevalence of modern slavery (refer to **Figure 5**) during FY2022. We did, however, use suppliers located in the following four countries considered to be in the top 50 countries with the highest prevalence of modern slavery, collectively contributing 1.3% of the Group's supplier spend: Democratic Republic of Congo, Guinea, Liberia and Zimbabwe. Further assessment of the risk of modern slavery in our supply chain will be undertaken with a focus on suppliers in higher risk countries where we continue to have an operational presence, having regard to the revised modern slavery prevalence rankings and vulnerability scores included in the Global Slavery Index 2023<sup>3</sup> issued in May 2023.

# MEASURES TO MITIGATE MODERN SLAVERY RISKS

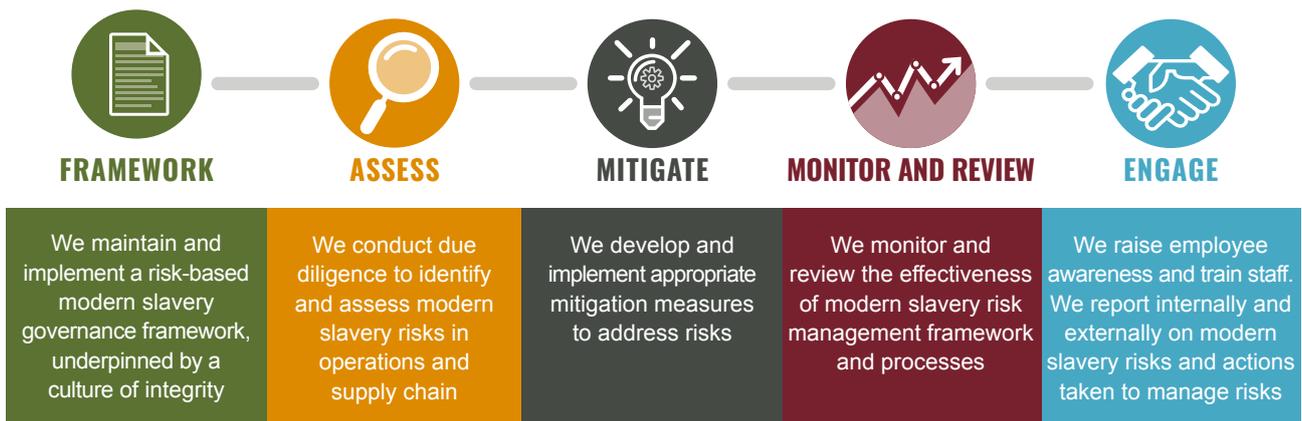
## GOVERNANCE

DRA Global's Board of Directors is responsible for the Group's culture of ethics and integrity, and the stewardship of compliance and risk management practices which includes the governance of our potential risk of modern slavery. The Board is supported by the Audit and Risk Committee, responsible for overseeing the effectiveness of the system of internal controls, risk management and compliance.

The Board is committed to prevent and address any adverse human rights and associated impacts arising from our operations and supports the international human rights protection principles and rights encompassed in the *United Nations Guiding Principles on Business and Human Rights* and the *United Nations Universal Declaration of Human Rights*.

DRA's CEO and Executive Committee are accountable to the Board for the effective implementation of the Group's governance processes and practices. The governance approach to address modern slavery risks is mainly governed by our Sustainability Policy and our Human Rights and Modern Slavery Standard, supported by our risk and compliance management frameworks, as presented in **Figure 6**.

**Figure 6: DRA's modern slavery governance approach**



Various systems and processes are in place to identify, assess, manage and monitor our modern slavery risks, which includes:

- Establishing a **culture of integrity**, supported by a Code of Conduct and a Supplier Code of Conduct that confirms the expected behaviours of our directors, employees and suppliers.
- Ensuring our employees enjoy a **safe and respectful working environment**, with implemented measures in relation to the protection of employees' human rights, non-discrimination, equal opportunities, work health and safety, inclusion and diversity, collective bargaining and fair remuneration.
- Implementing **risk management practices** following a whole of business approach for identifying, evaluating, monitoring, reviewing and reporting of strategic, operational and project risks.
- Undertaking **due diligence of our suppliers** to assess any potential compliance or reputational risks, including the risk of modern slavery, and undertaking further due diligence where risks are identified.
- Using **standard contractual terms and conditions** with suppliers confirming expectations in relation to compliance with any applicable modern slavery laws.
- Ongoing **engagement** with, and **monitoring** of, suppliers.
- Undertaking **comprehensive risk assessments** prior to entering any foreign markets, which includes a detailed country risk assessment and assessment of modern slavery risks.
- Requiring **reporting** by employees, stakeholders or suppliers of any potential human rights violations and setting the review and required action to be taken in response to such reports.
- Providing **regular reports** on the risks of modern slavery and the measures to mitigate such risks to the relevant governing bodies across the group, with ultimate oversight by the DRA Board.
- Building the **understanding** of modern slavery risks and the measures to mitigate the risks through employee training and awareness.
- Providing secure, confidential and accessible **employee grievance mechanisms**, as well as a whistleblower protection program (our Speak Up service) that encourages directors, employees and third parties to speak up and raise their concerns if they become aware of any potential misconduct, including suspected concerns of modern slavery.

The Group's internal controls (including the frameworks, standards, policies and procedures) reinforce these systems and processes, and are designed to manage risk and to ensure compliance with relevant legislation and regulation, including social, environmental and ethical issues.

## POLICIES AND STANDARDS

Governance of the potential risks of modern slavery in our operations and supply chain is underpinned by a range of policies, frameworks and standards that outline our commitment and expectations towards modern slavery. These are available to all employees through the intranet, and all external-facing policies are available at [www.draglobal.com](http://www.draglobal.com)

### CODE OF CONDUCT

Our Code of Conduct outlines the Group's commitment to a high level of integrity and ethical standards in all business practices and outlines how DRA expects its employees, management and directors to behave and conduct business in the workplace on a range of issues.

The Code of Conduct confirms our support of the international principles encompassed in the *United Nations Guiding Principles on Business and Human Rights* and the *United Nations Universal Declaration of Human Rights*. It reinforces our commitment to prevent and address any adverse human rights and associated impacts arising from our operations, and the responsibility to report any suspicions of human rights or modern slavery abuses taking place within the Group's operations and projects or its supply chain.

### SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct outlines the minimum expectations of suppliers in relation to various integrity principles, including human rights. The Code requires suppliers to, among other things, comply with laws on employment practices, human rights and modern slavery, demonstrate a commitment to the health and safety of employees, ensure a workplace that supports diversity, equal opportunities and inclusion, have robust management processes to manage their supply chain in accordance with the Code and report any breaches of the Code to DRA.

Embedding the commitment to DRA's Supplier Code of Conduct in our supplier onboarding process is ongoing. During FY2022, the Supplier Code of Conduct was communicated to all current suppliers in our APAC region, specifically highlighting their obligation to prevent human rights violations (including modern slavery) in their operations and supply chain.

### HUMAN RIGHTS AND MODERN SLAVERY STANDARD

Our Human Rights and Modern Slavery Standard is guided by international human rights principles encompassed in the *United Nations Universal Declaration of Human Rights*, the *International Labour Organization Declaration on Fundamental Principles and Rights at Work*, the *United Nations Global Compact* and the *United Nations Guiding Principles on Business and Human Rights*. It confirms our commitment to human rights and ensures we treat people with dignity and respect. The Standard provides guidance on the identification, management and monitoring of human rights risks, processes to follow to avoid causing or contributing to the adverse human rights impacts, and measures to address any human rights concerns or violations should they arise.

Our Standard addresses reporting, redress and investigation of human rights and modern slavery violations. It involves a diverse group of senior management, independent control functions, and escalation protocols for internal and external reporting. During the reporting period, no human rights or modern slavery concerns were identified or reported within the Group's supply chain or its operations.

Increasing awareness of modern slavery is a critical aspect in identifying and addressing modern slavery risks. Bespoke e-learning training on the Human Rights and Modern Slavery Standard will be delivered to all employees across the Group.

### SANCTIONS COMPLIANCE AND BUSINESS PARTNER DUE DILIGENCE STANDARD

Our Sanctions Compliance and Business Partner Due Diligence Standard provides a structured and consistent approach for the identification, assessment, evaluation and treatment of compliance and reputational risks, including the risk of modern slavery, prior to engaging or entering contractual arrangements with a business partner. We follow a risk-based approach with differing levels of due diligence to be undertaken when engaging any business partner.

This Standard was reviewed and amended towards the end of FY2022 to strengthen our approach and provide greater clarity on the process, providing guidance to employees on their roles and responsibilities and is supported by a standardised risk assessment methodology. Following the adoption of the revised Standard, training sessions were held with management teams and key staff involved in the engagement of third parties.

## **NEW / RE-ENTRY COUNTRY OR JURISDICTION STANDARD**

The New / Re-entry Country or Jurisdiction Standard sets out the required assessment of risks prior to entering new foreign markets or re-entering any foreign market where we have not had a recent presence. We use the prevalence of and vulnerability to the risk of modern slavery as a measure to assess the risk of modern slavery, as explained further in this statement.

## **RESPECTFUL WORKPLACE POLICY AND STANDARD**

We do not condone behaviour that can be perceived as bullying, discrimination or harassment, that is humiliating, intimidating or hostile, or any form of sexual harassment. Our Respectful Workplace Policy and Standard confirms our commitment to a respectful workplace and sets the requirements for acceptable behaviour in the workplace and the consequences for breaching these requirements.

## **INCLUSION AND DIVERSITY POLICY AND STANDARD**

Developing a diverse workforce is critical in building our organisational capability and developing high-performing teams. We are committed to providing an inclusive and diverse workplace, free from discrimination and unfair bias, where everyone is valued, respected and supported. Our Inclusion and Diversity Policy and Standard confirms our commitment by outlining our requirements around inclusion, diversity and equal opportunities in the workplace, and how any issue of unfair treatment can be raised and addressed.

## **GRIEVANCE HANDLING AND DISPUTE RESOLUTION STANDARD**

We recognise the prompt and fair resolution of workplace grievances is essential to maintaining a positive and healthy work environment. Our Grievance Handling and Dispute Resolution Standard prescribes the process to enable the resolution of workplace grievances and disputes.

## **SPEAK-UP POLICY AND STANDARD**

The Speak-Up Policy and Standard outlines our commitment to encouraging directors, employees and third parties to speak up and raise their concerns if they become aware of potential misconduct, including suspected issues of modern slavery. We do not permit retaliation of any kind against those who have reasonable grounds to speak up about a violation of a policy or standard. Dedicated, independent third-party services are available to receive confidential reports on any potential, suspected or actual modern slavery abuses either in writing and/or by telephone. These reports are confidential and can be made on an anonymous basis.

# EVALUATING THE EFFECTIVENESS OF OUR ACTIONS

DRA is committed to the continuous improvement of its modern slavery risk management processes. We continuously monitor and review the effectiveness of our measures and identify opportunities to further enhance the identification and treatment of modern slavery risks across the Group's operations and supply chain.

During FY2022, we focused on enhancing our assessment and management of modern slavery risks. We regularly assess and provide reports, with supporting data, to the Board and the Audit and Risk Committee on actions taken to manage the risk of modern slavery in our operations or supply chain. This helps to support 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.

Our annual compliance management plan sets goals to be achieved in relation to the management of our modern slavery risk management approach. As we mature our processes, we will also seek to improve our reporting of modern slavery risks and develop appropriate key performance indicators.

During FY2022, there have been no known incidents, reports or significant risks of modern slavery identified within our operations or supply chain.

DRA is committed to further enhancing our modern slavery risk management approach and building on our achievements as reported in this statement. We have identified the following key activities to improve the effectiveness of our modern slavery risk management approach:

- Review our Human Rights and Modern Slavery Standard to ensure it continues to effectively govern the identification and management of modern slavery risks and enables compliance with applicable laws, having regard to the proposals included in the statutory review of the Modern Slavery Act released by the Australian Government's Attorney-General in May 2023.
- Continue to strengthen the implementation of our processes and procedures that support the identification and treatment of modern slavery risks, with a focus on countries and jurisdictions that have a higher risk of modern slavery.
- In addition to business unit procurement processes, develop a Group Procurement Standard that includes expectations of due diligence in accordance with DRA's Sanctions Compliance and Business Partner Due Diligence Standard and alignment to DRA's Supplier Code of Conduct to strengthen the due diligence process in our procurement practices.
- Continue to deliver employee training on our Code of Conduct and Human Rights and Modern Slavery Standard.
- Strengthen our measurement of the effectiveness of the modern slavery framework by adopting and reporting against formal key performance indicators.

# REFERENCES

- 1 The International Labour Organization, Walk Free Foundation and the United Nations International Organisation for Migration, 2022, ***Global Estimates of Modern Slavery: Forced Labour and Forced Marriage***. Available from <https://www.walkfree.org/reports/global-estimates-of-modern-slavery-2022/>
- 2 Walk Free Foundation, 2018, ***The Global Slavery Index 2018***, The Minderoo Foundation Pty Ltd. Available from <https://www.walkfree.org/global-slavery-index/>
- 3 Walk Free, 2023, ***The Global Slavery Index 2023***, Minderoo Foundation Limited. Available from <https://www.walkfree.org/global-slavery-index/>

# APPROVAL

This statement was approved by DRA's Board of Directors, the principal governing body, on 28 June 2023.



**Peter Mansell**  
Board Chair

# ANNEXURE A: 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.

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

# ANNEXURE B: MATERIAL SUBSIDIARIES

Material subsidiaries of DRA Global Limited, which are those with the most significant contribution to the Group's revenue or profit/ (loss) before tax during FY2022 are as follows:

| NAME                                  | COUNTRY OF INCORPORATION | % INTEREST |
|---------------------------------------|--------------------------|------------|
| DRA Americas Inc.                     | Canada                   | 100%       |
| DRA Americas Perú S.A.C               | Peru                     | 100%       |
| DRA Pacific Pty Ltd                   | Australia                | 100%       |
| DRA Projects Australia Pty Ltd        | Australia                | 100%       |
| DRA Projects Pty Ltd                  | South Africa             | 100%       |
| DRA Projects SA Pty Ltd               | South Africa             | 100%       |
| DRA South Africa Projects Pty Ltd     | South Africa             | 100%       |
| G&S Engineering Services Pty Ltd      | Australia                | 100%       |
| Minerals Operations Executive Pty Ltd | South Africa             | 100%       |
| Minopex Lesotho Pty Ltd               | Lesotho                  | 100%       |
| New SENET Pty Ltd                     | South Africa             | 100%       |
| UMM Contracting Services Pty Ltd      | South Africa             | 60%        |

# ANNEXURE C: 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 the Modern Slavery Act.

| MANDATORY REPORTING CRITERIA  | SECTION                                     | PAGE    |
|---|---|---------|
| a) Identify the reporting entity.   | About this statement<br>Annexure A          | 1<br>15 |
| b) Describe the reporting entity's structure, operations and supply chains.   | We are DRA Global                           | 4 - 6   |
| c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.   | Assessment of modern slavery risks          | 7 - 8   |
| d) 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.  | Measures to mitigate modern slavery risks   | 9 - 12  |
| e) Describe how the reporting entity assesses the effectiveness of these actions.   | Evaluating the effectiveness of our actions | 13      |
| f) 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). | About this statement                        | 1       |
| g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.   | -   | -       |

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