



# ANTI-BRIBERY AND CORRUPTION STANDARD


## COMPLIANCE

*DRA Global*  
ABN 75 622 581 935

DRA-00-COM-STD-004

Revision: 0

**APPROVALS**

| Description | Name         | Title             | Signature  | Date         |
|-------------|--------------|-------------------|--|--------------|
| Approval    | Andrew Naude | Managing Director |  | 18 June 2021 |

**REVISION RECORD**

| Revision | Description         | Date         |
|----------|---------------------|--------------|
| 0        | Issued for Approval | 16 June 2021 |

## REFERENCE DOCUMENTS

| Document Number     | Document Description                          |
|---------------------|---|
| DRA-00-COM-POL-001  | Anti-Bribery and Corruption Policy            |
| DRA-00-GBL-CODE-001 | Code of Conduct                               |
| DRA-00-COM-STD-005  | Conflicts of Interest Standard                |
| DRA-00-COM-STD-006  | Gifts Entertainment and Hospitality Standard  |
| DRA-00-COM-STD-008  | New/Re-entry Country or Jurisdiction Standard |
| DRA-00-RSK-FRM-001  | Risk Management Framework                     |
| DRA-00-COM-CODE-001 | Supplier Code of Conduct                      |
| DRA-00-COM-STD-002  | Speak Up Standard                             |
| DRA-00-COM-STD-007  | Sanctions Compliance Standard                 |
| DRA-00-CG-FRM-002   | Delegation of Authority Framework             |

## DEFINITIONS

| Terms  | Definition   |
|--|--|
| “AUD” or “\$”  | Australian Dollar  |
| “Authorised Delegate”  | Persons occupying specific positions with the DRA Group to whom authority has been delegated in terms of a DOA   |
| “Benefit”  | Benefits include preferential treatment, privileged access, favours or other advantage offered to an individual. They may include invitations to sporting, cultural or social events, access to discounts and loyalty programs and promises of a new job.<br>The value of benefits may be difficult to define in dollars, but as they are valued by the individual, they may be used to influence the individual's behaviour |
| “Board”  | The board of directors of DRA Global   |
| “CEO”  | The Chief Executive Officer of DRA Global, being a member of the Board (often referred to as the Managing Director of DRA Global)  |
| “CFO”  | The Chief Financial Officer of DRA Global  |
| “Corporate”  | A separately budgeted cost centre responsible for oversight of businesses and coordination of the activities of the businesses, reporting to the Executives  |
| “Corporations Act”   | The Corporations Act 2001 (Cth)  |
| “Declaration Form to Receive or Give a Gift, Entertainment, Hospitality” | The form attached as Annexure A to this Standard required for the giving or receiving of a gift, entertainment, and hospitality  |
| “Director”   | Member of the Board  |
| “DOA”  | A delegation of authority, given by the CEO to an individual occupying a specific role within the DRA Group, whereby such individual is able to bind and commit a DRA Group entity under specific circumstances, pursuant to the Delegation of Authority Standard and Delegation of Authority Framework  |
| “DRA Global”   | DRA Global Limited, registration number ACN 622 581 935  |
| “DRA Group”  | DRA Global and its subsidiaries, associates, and joint ventures  |
| “Due Diligence Procedures”   | The DRA Group procedures for undertaking due diligence with respect to clients and Third-Party Service Providers.  |
| “Eligible Recipient”   | The person to whom a Speak-Up Report is made in accordance with the Speak Up Standard  |
| “Employees”  | Any employee of the DRA Group, including Directors, prescribed and other company officers, permanent and temporary staff   |
| “EVP”  | Executive Vice-President   |
| “Executives”   | The CEO and CFO of the Group, as applicable  |

| Terms  | Definition   |
|--|--|
| “External Auditor”                             | The audit firm (including any of its associated firms) appointed to undertake Audit Services for DRA Global  |
| “Gift”   | Gifts are free or discounted items or services and any item or service that would generally be seen by the public as a gift. These include items of high value (e.g., artwork, jewellery, or expensive pens), low value (e.g., small bunch of flowers), consumables (e.g., chocolates) and services (e.g., painting and repairs). Fundraising by public sector organisations that is consistent with relevant legislation and any government policy is not prohibited under the minimum accountabilities |
| “Gift, Entertainment and Hospitality Register” | The register maintained by Human Resources recording key information with respect to a completed Declaration Form to Receive or Give a Gift, Entertainment, Hospitality required in this Standard and in accordance with the Gift, Entertainment and Hospitality Standard.   |
| “Hospitality”                                  | The friendly reception and entertainment of guests. Hospitality may range from light refreshments at a business meeting to expensive restaurant meals and sponsored travel and accommodation   |
| “Internal Audit”                               | The internal audit function within Corporate responsible for reviewing the effectiveness of the DRA Group’s Risk Management processes and procedures   |
| “Marketing”                                    | Typical and usual marketing activities and brand building efforts to promote DRA in the mining industry including the sponsorship of local events and activities in the community  |
| “Nominated Delegate”                           | Persons occupying specific positions with the DRA Group to whom authority has been delegated in terms of a DOA or Temporary DOA  |
| “Risk Management”                              | The coordinated activities of the DRA Group to identify, analyse, evaluate, consult, treat, monitor, record, report and review all risks within the DRA Group  |
| “Sanctions”                                    | Sanctions means the economic sanctions/export controls laws, regulations or restrictive measures administered or enforced by the United States, United Kingdom, United Nations Security Council, European Union members, Australia, Canada, or any other relevant government   |
| “Sponsorship”                                  | The support of a person, organization, or activity (ex: conferences, symposiums, golf tournaments, meetings, mining student events) sometimes involving the use of DRA’s name, meant to build good will among employees, the community and the industry but not meant to garner favour from a specific client or company   |
| “Standard”                                     | This Anti-Bribery and Corruption standard  |
| “Third-Party Service Provider”                 | Business representatives, agents, distributors, consultants, service partners, suppliers or other contractors or intermediaries that has, or wishes to have, a business relationship with any DRA Group entity   |

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## 1 SCOPE

This Standard applies to all companies, joint ventures, and operations within the DRA Group.

This Standard applies to all Employees, clients, and Third-Party Service Providers of the DRA Group.

This Standard does not replace other policies, frameworks, standards, and procedures that apply in relation to particular types of activities and should be read in conjunction with such other documents and approvals under those documents obtained.

## 2 OBJECTIVES

The objectives of this Standard are to set out the:

- responsibilities of the DRA Group and Employees in upholding the prohibition on bribery, corruption, fraud, facilitation payments, extortion, secret commissions, kickbacks, money laundering, and sanctions or other related improper conduct.
- minimum expectations on how to recognise, deal with and report instances of improper conduct associated with bribery and corruption.
- minimum expectations on giving and receiving of gifts, entertainment, hospitality and charitable or political donations.
- minimum expectations that clients and Third-Party Service Providers working with the DRA Group adhere to the DRA Group's Anti-Bribery and Corruption Policy and Supplier Code of Conduct.

## 3 CONTEXT

Integrity is fundamental to the DRA Group's core values and the way that the DRA Group conducts business.

Bribery and corruption are inconsistent with the DRA Group's values, and the DRA Group does not tolerate any form of bribery. We expect that our clients, Third-Party Service Providers, and others acting on our behalf, do the same.

There are serious criminal or civil liabilities and serious reputational damage which may be incurred if bribery or corruption is perpetrated by Employees, clients, or Third-Party Service Providers of DRA Group.

The DRA Group Anti-Bribery and Corruption Policy principles provide that all Employees must:

- act in the best interest of the DRA Group at all times.
- never engage in any acts of bribery or corruption, whether directly or indirectly.
- never give or receive gifts or hospitality that are excessive, inappropriate, or have the potential to improperly influence, or be perceived to improperly influence, a decision or outcome.
- always comply with the requirements of Sanctions regimes of the jurisdictions in which it operates, in accordance with the DRA Group's Sanctions Compliance Standard.

In addition to this Standard, all Employees and business activities of the DRA Group are subject to the DRA Group's Code of Conduct and Conflicts of Interest Standard and require that all business transactions be conducted solely in the best interests of the DRA Group, and conflicts of interest must be avoided.

Third-Party Service Providers are also required to comply, at all times, with the DRA Group's Anti-Bribery and Corruption Standard and Supplier Code of Conduct that contains principles that align with the spirit and intent of this Standard, and related Standards and policies referenced in this Standard.

## 4 KNOWLEDGE OF THIS STANDARD

All Employees are required by the Code of Conduct to make all decisions in the best interests of the DRA Group and within the law. Acting within the law means not only complying with any written law (legislation) but also complying with judge-made law. Examples of judge-made law includes obligations on an Employee to act honestly, diligently and in good faith in the course of their employment and not allow non-work related activities to unduly influence decisions and conflict with the proper performance

of the Employee's duties. Employees should consult with their relevant business legal support to ascertain whether any specific conduct in the course of their employment is within the law.

This Standard is to be regularly consulted in terms of identifying, avoiding, and managing any activity that may constitute bribery or corruption within the DRA Group. This Standard will be freely accessible on the DRA Group Intranet, with changes communicated within the DRA Group in as practical a manner as possible.

All relevant Employees are required to be fully knowledgeable of, and adhere to, this Standard. The Group Compliance Officer will regularly provide training on this Standard but Employees within the DRA Group that have one or more direct reports are required to regularly communicate the requirements of this Standard to their teams and ensure that they are aware of its contents. To the extent that an Employee violates this Standard, the Employee and / or their manager, to the extent the Manager has not communicated the requirements of this Standard, may be liable to appropriate disciplinary action, including possible termination of employment. The DRA Group reserves the right to terminate its business relationship with any Third-Party Service Provider who does not follow this Standard.

## 5 APPLICATION OF THIS STANDARD

The CEO is responsible for the implementation of, and promoting a culture of compliance with, the DRA Group's Anti-Bribery and Corruption Policy, this Standard and the obligations identified therein.

The CFO is responsible for implementing financial controls to manage bribery and corruption risks.

Managers at every level are responsible for ensuring the DRA Group's anti-bribery and corruption principles are adhered to and to put in place internal controls to prevent the risks of bribery and corruption including reporting to the Group Compliance Officer, CEO or Speak-Up service (as detailed in the Speak-Up Standard) on any breaches or material issues.

All Employees:

- must comply with all applicable anti-bribery and corruption laws (refer Section 6 below).
- must always comply with this Standard and the prohibitions relating to bribery and corruption as set out in Sections 6 to 14 below.
- have a responsibility to prevent and help detect bribery and corruption, and to report any potential or suspected bribery and corruption to an Eligible Recipient or via the DRA Group's Speak-Up service (refer to Section 11 below).

Specified Employees, pursuant to the Due Diligence Procedures, must, prior to engagement and entering into contractual arrangements with a proposed new client or new Third-Party Service Provider, provide a copy of the DRA Group's Supplier Code of Conduct and undertake due diligence on the proposed client or Third-Party Service Providers with respect to corporate profile, reputation, and business practices (including, but not limited to, adherence to compliance and regulatory obligations and environmental, social and governance principles (refer Section 7 below).

## 6 LAWS APPLYING TO BRIBERY AND CORRUPTION

The DRA Group is committed to complying with all laws of the jurisdictions in which it operates, including those laws relating to bribery and corruption.

Laws prohibiting bribery and corruption and engaging in a transaction in breach of sanctions apply in each country in which the DRA Group operates.

A number of these laws, such as the Australian Criminal Code Act 1995 (Cth), the United States' Foreign Corrupt Practices Act, the United Kingdom's Bribery Act 2010 and the Australian Modern Slavery Act 2018 have extra-territorial reach. This means that, for example, a citizen of Australia may be prosecuted in Australia, the United Kingdom, or the US, even where the relevant activity occurred entirely overseas.

In addition, compliance is required with the United Nations Security Council (UNSC) Sanctions and various other laws, including criminal, sanction and anti-money laundering and counter-terrorism financing. All these laws apply to the DRA Group and Employees and the intent of this Standard is to meet and exhibit best practice in adhering to these laws.

## 7 BRIBERY AND CORRUPTION

### 7.1 Bribery and Corruption

The DRA Group prohibits the giving, offering, promising, authorising, accepting, or requesting of a bribe or engaging in or promoting corrupt behaviour.

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward (monetary or non-monetary) offered, promised, or provided in order to gain any commercial, contractual, regulatory, or personal advantage and can take the form of gifts, hospitality, fees, rewards, or other benefits.

It can be direct or indirect, is irrelevant whether the payee or recipient of the act of bribery works in the public or private sector and does not matter that the bribe is offered or accepted by a Third-Party Service Provider. Merely offering the bribe will be a contravention of this Standard and will be sufficient for an offence to be committed.

Corruption is the dishonest or fraudulent misuse of a position of power, influence, or the terms of a person's employment, in order to gain a benefit. Common examples include bribery, extortion, fraud, kickbacks, and conflicts of interest.

### 7.2 Facilitation Payments

The DRA Group prohibits the making of facilitation payments subject to the exception below under Section 7.3 below.

Facilitation payments are minor unofficial payments made to Public Officials either directly or indirectly to expedite or secure the performance of routine government action. Examples of facilitation payments include fees for the expediting or processing of licences, government papers, work permits, inspection, etc.

Public Official includes:

- an employee, official or contractor of a government body or state-owned or state-controlled enterprise.
- a person performing the duties of an office or position created under a law of a foreign country or by the custom or convention of a country, such as a member of a royal family and some tribal leaders.
- a person in the service of a government body including a member of the military or the police force.
- a politician, judge or member of the legislature of a local government authority, state, province or country.
- an employee, contractor, or person otherwise in the service of an international public organisation (such as the United Nations).
- an individual who is or who holds himself or herself out to be an authorised intermediary or representative of a Public Official.
- a party official or candidate for public office.

### 7.3 Extortion Payments

Extortion is the wrongful use of actual or threatened force, violence, or intimidation to gain money or property from an individual or entity. Extortion generally involves a threat being made to the victim's person or property, or to their family or friends. The DRA Group view these payments as a form of extortion. An exception exists for certain money payments that are required to ensure the health and safety of Employees. These money payments may be demanded by Public Officials and are to be considered when deemed reasonably necessary to ensure the health and safety of Employees. The DRA Group views these payments as exceptional and may be paid without violating this Standard.

Employees must notify their manager, relevant business EVP, CEO, CFO, Group Compliance Officer, and the Group General Counsel as soon as practicable and provide all relevant documents and information relating to the requested payment. The payment must be approved by either the CFO or CEO in writing, including by email. Group Compliance will maintain a record of all money payments that constitute extortion payments.



## 7.4 Secret Commissions and Kickbacks

The DRA Group prohibits the paying or receiving of secret commissions, kickbacks, or payments to or from any person or entity.

Secret commissions or kickbacks occur where a payment from a third party is received or asked without disclosing that payment to their employer. A secret commission is generally an inducement to a person to use their position to influence the conduct of their employer's business. An example of a secret commission would include making a payment to an employee of a Third-Party Service Provider, where that employee or agent does not disclose the payment to the Third-Party Service Provider, in return for obtaining a commercial advantage to the DRA Group from that Third-Party Service Provider.

## 7.5 Charitable Donations, Sponsorships and Marketing

Subject to the terms of this Section 7.5, charitable donations and sponsorships, made on behalf of the DRA Group, and itemised in an approved budget, are approved by either the CEO or CFO in accordance with the DOA and on the basis that they are incurred in the relevant budget period and are not to be given or received to make or facilitate improper payments.

The DRA Group, as part of its corporate citizen activities, may give donations to charities or provide sponsorships for sporting, cultural or other events. Any donation or sponsorship, whether of in-kind services, knowledge, time, or direct financial contributions, must be transparent and documented and only provided to organisations that serve a legitimate public purpose, including general Marketing activities, with high standards of governance based on transparency and accountability. The aforementioned Marketing activities, capped at AUD\$500 for each distinct activity, are permitted at the sole discretion of the relevant EVP and in accordance with applicable DRA Group frameworks, standards, and policies.

## 7.6 Political Involvement

With respect to corporate political participation, the DRA Group does not permit an Employee on behalf of the DRA Group to make any political contribution or contribute to a political party or individuals involved in politics, whether in cash or kind without pre-approval in writing from the Board.

Any requests to make a political contribution by an Employee on behalf of the DRA Group requires a Declaration Form to Receive or Give a Gift, Entertainment, Hospitality to be completed and submitted to the CEO and Group Compliance Officer in the first instance for consideration. If the CEO and Group Compliance Officer approves the request in the first instance it must then be reviewed and approved by the Board.

With respect to personal political participation, the DRA Group recognises an Employee's right to participate in politics on the basis the Employee is not representing their participation in the political process is on behalf of the DRA Group.

## 7.7 Money Laundering and Sanctions

The DRA Group prohibits any form of money laundering in connection with its business activities.

Money laundering is the process by which a person or entity disguises the original ownership and control of the proceeds of illegal conduct by making such proceeds appear to have been derived from a legitimate source.

The DRA Group prohibits the making of any payment or undertaking any transaction that violates the DRA Group's Sanction Compliance Standard.

## 8 GIFTS, ENTERTAINMENT AND HOSPITALITY

Employees must exercise caution when offering or accepting gifts, entertainment and / or hospitality. Consideration should be given whether they are offered or received as an act of appreciation or common or cultural courtesy in accordance with standard business practice. Importantly, no obligation should be placed on the recipient and no expectation created by the giver or their associate.

Gifts, entertainment and hospitality or other benefit received or given may be given directly (to an Employee) or indirectly (to an Employee's family members, friends, or associates). Gifts, entertainment,

and hospitality provided by one Employee to another Employee are not subject to this Standard however are subject to other applicable standards and policies, including the Group Travel Standard.

Employees must declare all gifts, entertainment and hospitality or other benefit received or given directly or indirectly valued above AUD\$100 (or the foreign currency equivalent) or have a cumulative value above AUD\$100 over a 12-month period from the same provider. Where the value exceeds AUD\$100 and is less than AUD\$500 (or the foreign currency equivalent) then the relevant Authorised Delegate or Nominated Delegate under the DOA will need to approve or reject any declaration. Where the value exceeds AUD\$500 the CEO or CFO and Group Compliance Officer are required to approve or reject any declaration.

Where gifts, entertainment and hospitality or other benefits received or given are determined to have been given or received to influence a decision or outcome, Employees must make a declaration, regardless of value.

The DRA Group prohibits gifts in the form of cash or cash-equivalents (such as vouchers, gift cards or items that are readily convertible to cash) of any value to be made to non-Employees. Any payments made to Employees by the DRA Group, and relating to performance, are to be made in accordance with the Human Resource standards.

Employees are required to submit a Declaration Form to Receive or Give a Gift, Entertainment, Hospitality, or similar benefit (attached as Annexure A) within five (5) working days of receiving or being offered a benefit. The relevant Authorised Delegate or Nominated Delegate under the DOA or the CEO or CFO and Group Compliance Officer are required to approve or reject any declaration within 5 working days of receiving it. Note that all approvals or rejections require a reason to be recorded to support the outcome.

All completed and signed declarations must be forwarded to the relevant business' Human Resources support to update the Gift, Entertainment and Hospitality Register which will be reviewed periodically by the Group Compliance Officer.

## 8.1 Sponsored Travel

The giving or receiving of sponsored travel and or invitations to events involving activities over consecutive days and which may include overnight accommodation will be considered a gift, entertainment, or hospitality. Sponsored travel may only be approved, after a declaration is made, if the CEO or CFO and Group Compliance Officer determines that there are compelling business reasons, and that appropriate record is entered on the Gifts, Entertainment and Hospitality Register.

## 8.2 Benefits to Public Officials

The provision of gifts, hospitality or entertainment to a Public Official may be a legitimate and justifiable business activity in some circumstances. However, the practice can potentially create the perception that the DRA Group has sought to improperly influence the Public Official to obtain an improper advantage or preferential treatment. The CEO or CFO and Group Compliance Officer must approve gifts, entertainment or other benefits provided to a Public Official of any value and they should be recorded in the Gifts, Entertainment and Hospitality Register.

## 9 CLIENTS AND THIRD-PARTY DUE DILIGENCE

The DRA Group engages with clients and Third-Party Service Providers in a variety of circumstances, particularly in its trading activities and across the activities of its supply chain, including the sale and procurement of goods and services. The DRA Group is also involved in several joint ventures.

The DRA Group prohibits the provision of a benefit to a client or Third-Party Service Provider where it is expected or possible that some or all of that benefit will be provided or offered to another person, in order to obtain any improper business advantage for the DRA Group.

Specified Employees, pursuant to the Due Diligence Procedures, must communicate the DRA Group's Supplier Code of Conduct, Anti-Bribery and Corruption Policy and this Standard to all clients and Third-Party Service Providers prior to engagement. Contracts should also contain clauses that obtain client and Third-Party Service Provider undertakings, as applicable, to adhere to the DRA Group's Supplier Code of Conduct and Anti-bribery and Corruption Policy and Standard and provide assurances to

observe relevant laws and regulations including anti-bribery and corruption, anti-money laundering and sanction laws.

With respect to fees and expenses paid to Third Parties, relevant DRA Group employees must:

- ensure that all fees and expenses paid to Third Parties (including any commissions and success fees) represent appropriate and justifiable remuneration, which is transparent, commercially reasonable under the circumstances, and for legitimate services rendered.
- ensure that all fees and expenses must be paid to the Third Party themselves (and to an account in their name in their principal place of business).
- keep accurate financial records of all payments including accurate descriptions of the purpose of the payment.

Before the DRA Group engages with clients and Third-Party Service Providers or undertakes activities in new jurisdictions, appropriate due diligence must be undertaken in accordance with applicable DRA Group standards and the Due Diligence Procedures including checklists, questionnaires, risk assessments, in accordance with the DRA Group's Risk Management Framework, and desktop research and assessments using electronic solutions, to assess any potential Bribery and Corruption risks that may adversely impact the DRA Group.

## 10 ENTRY INTO NEW JURISDICTIONS AND NEW BUSINESS VENTURES

Entry into new countries and new business ventures may pose risks from an anti-bribery and corruption perspective. In advance of undertaking new business ventures or investing in new companies or countries, the DRA Group will include in its due diligence processes, and subject to the New/Re-entry Country or Jurisdiction Standard, consideration of corruption risks and its ability to address any such risks.

## 11 REPORTING AND INVESTIGATION OF NON-COMPLIANCE WITH THIS STANDARD

Employees, stakeholders, or Third-Party Service Providers who witness or suspect Bribery and Corruption within the DRA Group's businesses, including operations or projects, should report this to an Eligible Recipient or use the DRA Group's Speak-Up service (contact details are set out in the DRA Group's Speak-Up Policy and Standard and on the DRA Group's website).

The DRA Group will not permit retaliation of any kind against any Employees, stakeholders or Third-Party Service Providers who has reasonable grounds to suspect a violation of this Standard. Any actual or attempted retaliation is also a breach of this Standard. Employees must cooperate fully and openly with any investigation by the Company into alleged or suspected corrupt activity or breach of this Standard. Failure to cooperate or to provide truthful information is a breach of this Standard.

## 12 REVIEW OF THIS STANDARD

This Standard is under the authority of the CEO.

The document owner of this Standard is the Group Compliance Officer.

This Standard is subject to regular (at least annually) review by the Group Compliance Officer. Should any Employee identify any area of this Standard that is unclear, impractical and / or inappropriate, they are requested to raise the matter with the Group Compliance Officer for further investigation.

## 13 INTERPRETATION

It is recognised that this Standard may not cover all eventualities and may be unclear in certain instances. This will require interpretation of this Standard, in order to fulfil the objectives of the Standard. In such instance, Employees are requested not to attempt to interpret the Standard (unless such interpretation is obvious) but rather seek the advice of the Group Compliance Officer or a member of the DRA Group legal team to assist in this regard.

## 14 PROHIBITED CONDUCT

Employees are required to exercise appropriate care when considering implementing the DRA Group's compliance practices, including in relation to Anti-Bribery and Corruption. Practices that undermine the intent of this Standard are prohibited and contrary to the Code of Conduct. Such practices include:

- Not adhering to the respective roles and responsibilities detailed herein with respect to upholding the prohibition of Bribery and Corruption at the DRA Group.
- Failing to report actual or suspected contraventions of this Standard.
- Failure to give or receive a gift, entertainment, or hospitality in accordance with this Standard.
- Failing to provide the Supplier Code of Conduct to Third-Party Service Providers.
- Failing to undertake adequate Third-Party Service Provider Anti-Bribery and Corruption due diligence at origination of the business engagement and on an on-going basis.

Individuals engaging in any contravention of this Standard, whether deliberate or unintentional, without the requisite approval may be liable to appropriate disciplinary action, including possible termination of employment. The application of this Standard will be carefully monitored through regular risk reviews, Internal Audit and External Auditor review.

Employees must declare all gifts, entertainment and hospitality or other benefit received or given valued above AUD\$100 (or the foreign currency equivalent) or to a cumulative value of AUD\$100 in a 12-month period from the same provider.

Forward this Declaration Form to your relevant Authorised Delegate or Nominated Delegate or to the CEO or CFO and Group Compliance Officer.

Approval for any declarations of gifts, entertainment and hospitality or other benefit received or given above AUD\$100 and less than AUD\$500, must be approved by your DOA Employee. For amounts above AUD\$500 it must be approved by the CEO or CFO and Group Compliance Officer.

Employees are required submit this Declaration Form within 5 working days of receiving or being offered a benefit. Terms used in this form are as defined in the Anti-Bribery & Corruption Standard.

| Name of Employee Requesting Approval | Position |
|--------------------------------------|----------|
|                                      |          |

It is my intention to receive or give of the following gifts, entertainment, hospitality or sponsored travel or similar benefits.

Receive  or Give

| Benefit<br>(Description of the benefit including the purpose and justification as to why appropriate) | Date of Benefit | Name of Organisation | Value (AUD\$) |
|---|-----------------|----------------------|---------------|
|   |                 |                      |               |

Employees must exercise caution when giving or receiving gifts and/ or hospitality to ensure it is not perceived to improperly influence a business outcome. Personnel should also discuss with their DOA Employee the fact that they have received a benefit before accepting it, in order to determine the appropriate action. If a spouse, partner, or other related person is offered or receives a benefit, then approval must be sought.

**Acknowledgement**

In submitting this Declaration Form in the manner above, I acknowledge that:

- I have read and understand the DRA Group's **Anti-Bribery & Corruption Policy** and **Standard**.
- The giving or receiving of the above benefits will not give rise to any undue influence.
- The above benefit, if approved will be entered into the Gift, Entertainment & Hospitality Register.
- If this request is rejected the above benefit will be returned or not offered, as applicable.

|                                |             |
|--------------------------------|-------------|
|                                |             |
| <i>(Signature of Employee)</i> | <i>Date</i> |

**Approval (to be completed by DOA Employee/CEO/CFO and Group Compliance Officer) as applicable**

Approval/Rejection Confirmation (please select and provide a reason)

- Approved
- Rejected

|                                    |   |             |
|------------------------------------|---|-------------|
|                                    |   |             |
| <i>(Name of authorised person)</i> | <i>(Signature of authorised person)</i> | <i>Date</i> |