

# Securities Trading Policy



We are committed to ensuring that insiders act appropriately before dealing in DRA securities and do not damage DRA's reputation or market confidence in DRA securities

This policy ensures we meet our compliance obligations under the law with respect to prohibiting insider trading, and in some areas goes further, in order to protect the reputation of the DRA Group.

We encourage everyone to be long-term shareholders of DRA Global Limited. However, it is important that you take care of the timing of when you buy or sell DRA Global Limited securities.

Our securities trading principles are:

- / If you have 'Inside Information' about DRA Global Limited or another entity you must not:
  - o buy or sell DRA Global Limited securities or securities of the other entity;
  - o in any way procure, advise or encourage another person to deal in DRA Global Limited securities or securities of the other entity; or
  - o pass on inside information to another person who may use it to buy or sell DRA Global Limited securities or securities of the other entity.
- / Don't buy or sell DRA Global Limited securities if it could be perceived by the market that you are taking advantage of your position in an inappropriate way.
- / Don't seek to create a false market in, or manipulate the trading price of, DRA Global Limited securities.

Additional securities trading restrictions are imposed on directors, members of the Executive team (reporting to the CEO/Managing Director) and their direct reports, and other key personnel of the DRA Group ("**Restricted Persons**"). This includes restrictions on the buying or selling of DRA Global Limited securities during defined 'closed periods' as advised by the Board.

Everyone has a responsibility to assist in maintaining market confidence in the integrity of dealing in DRA Global Limited securities and are prohibited from taking advantage of their position

to make financial gains by dealing, directly or indirectly, in DRA Global Limited securities or another entity on the basis of Inside Information. If anyone has any doubts, they should not buy or sell DRA Global Limited securities or any other securities.

A breach of the insider trading laws can expose the DRA Group and individuals to penalties and third-party claims. Individuals may also be subject to disciplinary action, heavy fines and imprisonment.

This is a policy of DRA Global Limited and its controlled entities (collectively, "**DRA Group**"). It applies to all directors, employees, contractors and consultants of the DRA Group, and to any third-parties notified of its application to them. This policy also extends to all such individuals' immediate family members (including a spouse or partner, and a dependent child or stepchild) and any controlled entity.

More information and background on the insider trading laws and specified trading periods is included in the DRA Group's **Securities Trading Standard**, which is available on the DRA Global Limited website.

Approved by the DRA Global Limited Board of Directors on 28 June 2021