

# Speak-Up Policy



Our values provide that we always do the right thing by acting with integrity, courage and trust at all times. If you see something that's not right, it's important that you speak-up

Together our values, **Ethics Policy** and **Code of Conduct** set the standards of behaviour and establish the foundation of our culture.

We encourage anyone to speak-up and report any concerns about misconduct or an improper state of affairs or circumstances (referred to as **Misconduct**). We all have a responsibility to help detect, prevent and report immediately instances of Misconduct.

All speak up reports about Misconduct will be treated confidentially, however you may choose to report anonymously if you wish to do so. The DRA Group will not tolerate any individual suffering detrimental treatment or reprisals for having made a report of Misconduct.

## What should you speak-up about?

In order for the disclosure to be covered by this Policy, an individual must have reasonable grounds to suspect the information concerns Misconduct relating to the DRA Group or third party acting for the DRA Group. Examples include:

- / Failing to comply with laws, regulations or other legal obligations.
- / Unauthorised use of company resources, dishonest, fraudulent, theft, criminal, unlawful or corrupt activity, or a conflict of interest.
- / Price-fixing or misleading and deceptive conduct on a bid, proposal, offer or contract.
- / Unethical behaviour, serious failure to comply with appropriate professional standards, discrimination, human rights abuses, breaches of our policies, especially our Ethics Policy or our Code of Conduct.
- / Conduct or practices that present a real risk of damage to public health or public safety, us, our people, customers, third parties or the environment.
- / Financial irregularity (including fraud against the DRA Group or a customer, supplier or tax authority).
- / Information that indicates misconduct or an improper state of affairs in relation to the tax affairs of the DRA Group.
- / Conduct or practices that may cause financial loss to the DRA Group or damage the DRA Group's reputation.

This policy should not be used to raise personal or work-related grievances, disagreements over business decisions or minor matters. Refer to your Human Resources Officer for further guidance.

## Who should you speak-up to?

We encourage you to report via our speak-up service or to the DRA Group Speak-Up Protection Officer. You can report your concerns at any time by either calling, making a report online or sending an email. All disclosures will be treated confidentially. If you choose not to give your name, using the web or email enables us to ask for further information and give you feedback on your concern.

Alternatively, you can raise a concern anonymously or confidentially to an Executive Vice-President, Human Resources Officer, the Chief Executive Officer or Chief Financial Officer of DRA Global Limited, any Director of DRA Global Limited or to DRA Global Limited's external and internal auditors.

This Policy and the DRA Group's **Speak-Up Group Standard** is available on the DRA Global Limited website. The Standard provides contact details for our speak-up service and further information on how your concerns about Misconduct will be dealt with, how we protect and support those that speak up and those that might be the subject of a speak up report, as well as the legal protections that may apply in your country.

This is a policy of DRA Global Limited and its controlled entities (collectively, "**DRA Group**"). It applies to all directors, employees and business partners of each member of the DRA Group and to any consultants, contractors and other third-parties notified of its application to them.

Approved by the DRA Global Limited Board of Directors on 8 June 2020