



DRA Global Limited
ABN 75 622 581 935

Our vision: *'To be the preferred global mining and minerals technical partner for diversified service offerings'.*

Central to this vision is a commitment to live by DRA's values and act with integrity at all times.



CODE OF CONDUCT

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INTRODUCTION: A MESSAGE FROM THE LEADERSHIP TEAM

Good ethics makes great business and we need to demonstrate that in everything we do.

We owe it to our customers, our shareholders, our communities in which we operate and to each other to always uphold the highest standards of ethics and business conduct.

How we conduct business is fundamental to our success and achieving our vision and strategic objectives.

This Code of Conduct describes how we carry out business and behave in an ethical manner, as we work together to fulfil our purpose.

This Code of Conduct also lays out our expectations for the behaviours of our directors, employees, and contractors.

Together our values and our Code of Conduct sets the expected standards of behaviour and establishes the foundation of our culture.

It is essential not only for those of us who work at DRA, but for all of those we serve and interact with.

Our Board, my colleagues and I are deeply committed to this Code of Conduct.

I encourage you to read this Code of Conduct carefully and think about how our commitment to complying with our legal obligations, as well as our commitment to acting ethically and responsibly, co-exist with our ambitions to build DRA into a truly world-class engineering business.

Andrew Naude
Managing Director and CEO
On behalf of the Executive Leadership Team of DRA

WHO WE ARE AND OUR VALUES

We sustain our organisational culture by remaining true to who we are today and by delivering in line with our aspirations, purpose and values.

Our purpose is to create tangible value and make dreams a reality for employees, customers, shareholders and the communities within which we operate, delivering capital assets around the world.

Our values drive our actions and behaviours in every interaction with each other, our customers, suppliers, partners and other stakeholders. They shape our business strategy and together with our Code of Conduct are the foundation of our culture.

Our values include:



SAFETY
We live an actively caring culture.



PEOPLE
Our people are the cornerstone of our business.



INTEGRITY
We always do what is right.



TRUST
We deliver on our promises.



EXCELLENCE
We strive to be better than yesterday.



COURAGE
We actively lead the change.

“Each of us has a part to play in upholding DRA’s reputation to ensure our ongoing success”.

Andrew Naude, Managing Director & CEO

HOW THIS CODE OF CONDUCT APPLIES TO US

WHO DOES THIS CODE OF CONDUCT APPLY TO?

This Code of Conduct applies to all directors, management and employees at every level, in every country and every DRA legal entity, including joint ventures where DRA has a controlling interest.

DRA's contractors, agents, suppliers, partners, service providers and consultants are expected to adhere to this Code of Conduct when dealing with, or acting on behalf of, any DRA entity.

COMMITTING TO OUR CODE OF CONDUCT

Our Code of Conduct sets out the global standards of behaviour that DRA expects of its people. It has been developed to help us, and the people we work with, to uphold DRA's values.

It embodies our commitment to good corporate governance and responsible business practice. It also reflects the expectation of our customers, investors, regulators and the community.

Each one of us has a duty to follow this Code of Conduct and to take individual responsibility to act with integrity at all times, even if this means making difficult choices.

Our Code of Conduct should guide us in those choices and inspire us to perform at our best. We can help grow DRA by following the principles of our Code of Conduct.

This Code of Conduct outlines our responsibilities, the additional responsibilities of our leaders, and summarises the key elements of DRA's policies designed to ensure lawful and ethical conduct. These are non-negotiable global standards that apply to all of us, regardless of where we work within DRA.

CONTRAVENTIONS OF THIS CODE OF CONDUCT

The consequences of not complying with this Code of Conduct can be severe, including damage to DRA's reputation, significant fines and penalties and even criminal liability for individuals or DRA.

Any failure to comply with this Code of Conduct or its supporting policies will be taken seriously and appropriate action taken. Depending on the circumstances, this may include training, discipline, or other corrective action, up to and including termination of employment.

OUR RESPONSIBILITIES

As an employee or business partner, we are expected to:

- // Act ethically and safely;
- // Do our part to achieve our objectives, while making decisions in compliance with this Code of Conduct – without compromise;
- // Familiarise ourselves with, and use, this Code of Conduct to the standard of expected behavior;
- // Participate in any mandatory training relating to this Code of Conduct and DRA policies;
- // Obey all laws and regulations that apply to our work and to not intentionally contravene laws (by act or omission), including acts that can be considered misleading or deceptive;
- // Speak up if we have a concern about any behaviour that may not meet the standards in this Code of Conduct or our policies or be a violation of the law; and

- // Cooperate with internal audits, external audits and investigations by fully and truthfully providing information and by preserving all materials that might be relevant.

If we have any questions about this Code of Conduct or are confronted with an ethical challenge, we must seek advice from our managers, human resources representatives or legal representatives.

LEADERS HAVE ADDITIONAL RESPONSIBILITIES

Our Executive Leadership Team and the wider management teams are committed to upholding high ethical standards that meet the spirit of this Code of Conduct.

If we manage others we must lead by example, be a positive role model and support our team members. We are expected to:

- // Lead by example and act as a role model for ethical conduct;
- // Take ownership of conduct in the workplace and make those standards clear to those who report to us;
- // Help our team members understand their responsibilities under this Code of Conduct and our policies;
- // Create an atmosphere that encourages open and honest communication and encourage our people to say something if they have concerns. We listen and respond to concerns when they are raised and protect those who report violations from reprisals; and
- // Be vigilant in preventing, detecting and responding to breaches of this Code of Conduct.

FOLLOWING THE LAW

As a multi-national company, DRA does business in many countries around the world. We must follow the laws and regulations of multiple jurisdictions including nations, provinces, states, municipalities and international bodies, as applicable to our businesses and operations. When local laws permit something that is prohibited by this Code of Conduct, then our Code of Conduct always prevails as we aspire at the highest community expectations and ethical standards.

IF LAWS CONFLICT

If we encounter a conflict between the laws of a particular jurisdiction and this Code of Conduct, or if we need clarification regarding applicable law, we should consult with our legal representatives before deciding how to act.

SPEAK-UP

Delivering on our commitment to this Code of Conduct requires us to have a culture in which it is acceptable to Speak-Up and raise concerns about behaviours that do not align with this Code of Conduct.

We all have a responsibility to help detect, prevent and immediately report instances of suspected misconduct or potential breaches of law, of this Code of Conduct or of any other DRA policy.

Where we do Speak-Up, we will not tolerate retaliation against anyone for raising a concern. We will take concerns seriously, act professionally when our behaviour is challenged and take a strong stance on any proven wrongdoing or breaches of this Code of Conduct.

Our **Speak-Up Policy and Standard** are available on DRA's website and provide detailed information on how our concerns will be dealt with. It also outlines how we protect and support those that Speak-Up and those that are the subject of a Speak-Up report, as well as the legal protections that apply in our country of business.

WHAT SPEAK-UP IS NOT USED FOR?

Speak-Up should not be used to raise personal work-related grievances, disagreements over business decisions or minor matters. If we have a general employment related concern that affects us personally or is about how we are being treated, these matters should be raised in accordance with workplace disputes or grievance procedures. Advice can be sought from our managers or human resources representatives.

WHAT SHOULD WE SPEAK-UP ABOUT?

Individuals are encouraged to Speak-Up about any misconduct, anything that we believe to be illegal, unethical or improper, or any breach of our Code of Conduct, which may impact our operations. Examples include:

- // Failing to comply with laws, regulations or other legal obligations;
- // Unauthorised use of DRA resources, theft, conflicts of interest or dishonest, criminal, unlawful or corrupt activity;
- // Price-fixing or misleading and deceptive conduct on a bid, proposal, offer or contract;
- // Unethical behaviour, unsafe behaviour, serious failure to comply with appropriate professional standards, discrimination, human rights abuses, breaches of our policies, especially our Ethics Policy or this 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 DRA or a customer, supplier or tax authority;
- // Information that indicates misconduct or an improper state of affairs in relation to the tax affairs of DRA; and
- // Conduct or practices that may cause financial loss to DRA, or damage DRA's reputation, or bring the operation of DRA into dispute (together referred to as "Reportable Matter").

WHO SHOULD WE SPEAK-UP TO?

If we have concerns about a Reportable Matter, we are encouraged to report via our Speak-Up Service or to our DRA Speak-Up Protection Officer.

We can report our concerns at any time by either calling, making a report online or sending an email.

All Speak-Up reports on Reportable Matters will be treated confidentially. We can choose to make a disclosure anonymously. If we choose not to give our name, using the web or email enables us to ask for further information and obtain feedback on our concern.

SPEAK-UP CONTACTS

Region	Contact
APAC	<p>Online: www.DRAspeakupservice.deloitte.com.au</p> <p>Email: DRAspeakupservice@deloitte.com.au</p> <p>Free Phone: +61 (1) 800 173 918</p>
EMEA	<p>Online: www.tip-offs.com</p> <p>Email: dra@tip-offs.com</p> <p>Free Phone: +27 (0) 800 384 427 or +27 (0) 31 571 8757</p>
Americas	<p>Free Phone: +1 724 754 9799</p>
Global	<p>Email: speakupprotectionofficer@DRAGlobal.com</p>

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

See our **Speak-Up Standard** for more information.

PROMOTING A HEALTHY AND SAFE WORKPLACE

SAFETY IS A KEY VALUE OF DRA

We encourage an actively caring culture that is bold and kind.

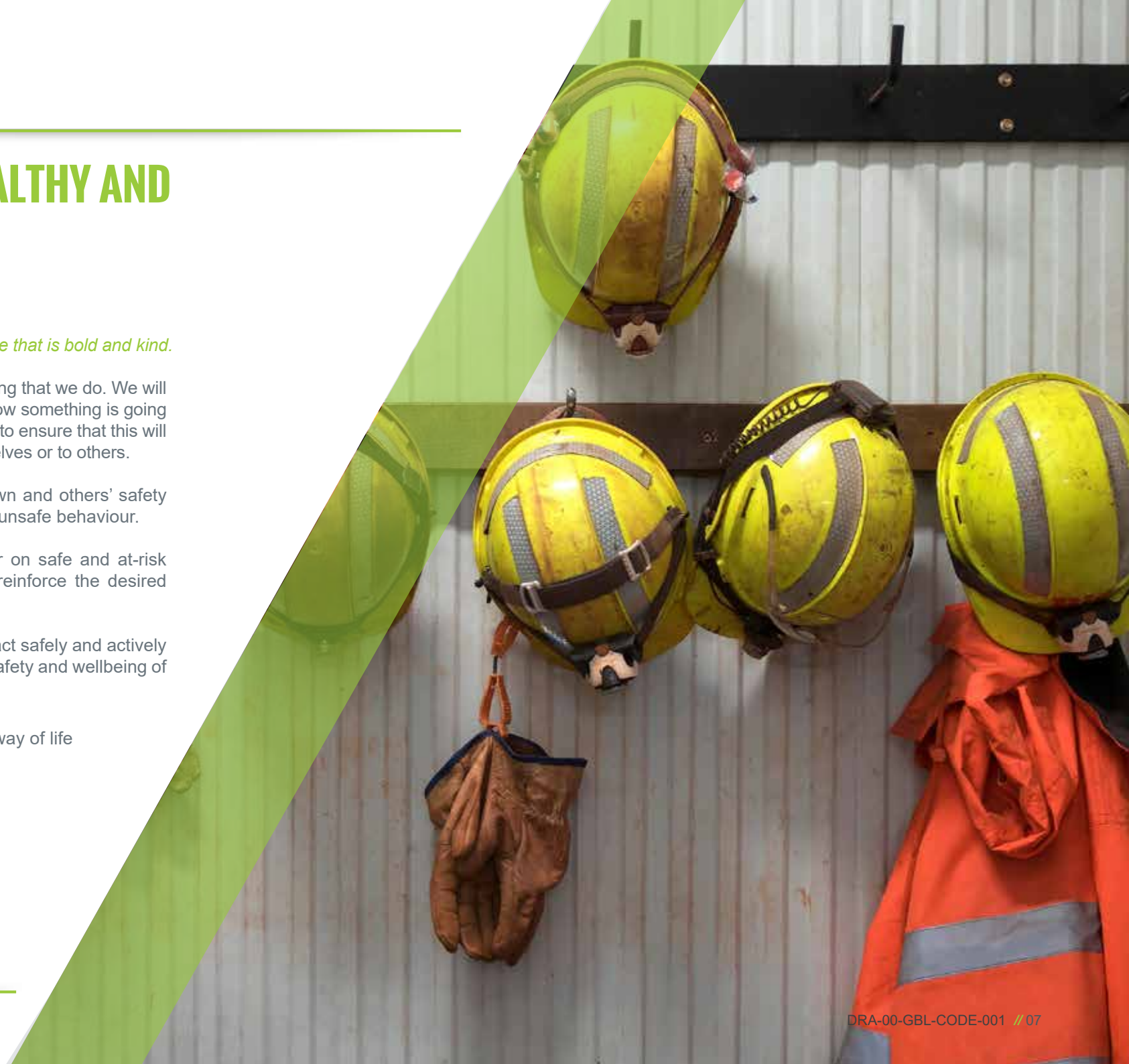
We will act safe and healthy in everything that we do. We will take the time to stop and think about how something is going to be done and what needs to happen, to ensure that this will not result in any physical harm to ourselves or to others.

We must all be responsible for our own and others' safety and understand the consequences of unsafe behaviour.

We regularly engage with each other on safe and at-risk behaviour and coach each other to reinforce the desired behaviours.

We commit to ensure that we always act safely and actively care in all that we do and ensure the safety and wellbeing of all stakeholders.

- // Health, safety and quality is our way of life
- // Security at work



WE CONDUCT OUR BUSINESS IN A RESPONSIBLE WAY TO PROTECT THE SAFETY AND WELLBEING OF OUR STAKEHOLDERS

OUR PRINCIPLE

We all share the responsibility of protecting the safety and wellbeing of our people, customers, partners and communities, as well as the protection of the environment where we operate. Each one of us is responsible for working safely and taking care of each other.

We believe all incidents are preventable and pursue the objective of the elimination of harm. We believe that no task is too important or urgent that it cannot be done with due regard for the safety and wellbeing of all stakeholders.

We expect all our people to arrive for work fit for duty and maintain work practices that are acceptable to our clients, peers, communities and fellow employees.

WHAT DO WE MEAN?

We never compromise on our standards of health and safety, which is essential to our success.

Our commitment is to provide safe and healthy working conditions for the prevention of work-related injuries and illnesses and where our workforce can actively participate in the achievement of this vision.

Our people are required to be able to perform their work in a way that does not compromise or threaten the safety or health of themselves or others.

We are committed to providing a high quality of services to our customers, where all our people take personal responsibility for the quality of their work and for continual improvement.

OUR COMMITMENTS

- // Stop work and reassess when anything changes;
- // Arrive fit for work;
- // Immediately report all unsafe events and conditions;
- // Actively look-out for the safety of others and say something in the face of potential harm; and
- // Openly communicate health and safety related aspects on an ongoing basis.

KEY POLICIES & MORE INFORMATION

- // Health, Safety and Environmental (HSE) Policy;
- // HSE management system;
- // Fitness for Work Standard;
- // Injury Management Standard; and
- // Our managers, health and safety representatives or human resources representatives.

WE ALWAYS

- ✓ Report to work fit for duty and ready to safely perform assigned work;
- ✓ Only work if we are medically and mentally fit as well as properly rested, to ensure that we can perform our duties in a safe and efficient manner;

- ✓ Only perform work that we are qualified for;
- ✓ Follow our health, safety and quality rules, practices and procedures that applies to our work;
- ✓ Stop any work that appears unsafe and immediately report any accident, injury, illness, or hazardous condition;
- ✓ Recognise safe behaviours;
- ✓ Eliminate hazards and reduce risks by implementing appropriate hazard identification and controls to manage health and safety responsibilities and risks; and
- ✓ Say something if we observe an unsafe or unhealthy working environment and listen to others who say something.

WE NEVER

- x Come to work if we are unfit for work;
- x Perform work that we are not qualified to perform; nor
- x Perform unsafe practices or undertake at-risk behaviours.

SECURITY AT WORK

OUR PRINCIPLE

We are committed to providing our people with a safe and secure work environment and protecting our operations and reputation.

WHAT DO WE MEAN?

We implement standards and procedures, and commit the security resources required, to ensure the safety and security of all our people involved in our business and the protection of our operations, equipment, information systems and our reputation.

We will establish security operations that are consistent with international standards and norms for dealing with security and human rights.

We will engage with internal and external stakeholders, including local communities and governments, to support effective risk assessment processes aimed at identifying, monitoring and managing security-related risks.

We ensure we respond effectively to a security threat, crisis or emergency which could impact people, the environment, business, operations or reputation.

OUR COMMITMENTS

- // Provide facilities and resources that supports a secure working environment;
- // Report security issues immediately; and
- // Ensure the protection of the personal information of all stakeholders.

KEY POLICIES & MORE INFORMATION

- // Sustainability Policy;
- // Security management standards;
- // Crisis management plans; and
- // Our managers, human resources representatives or health and safety representatives.

WE ALWAYS

- ✓ Follow the security and emergency protocols and procedures that apply to our operations;
- ✓ Secure and lock away valuables, equipment and facilities;
- ✓ Keep our passwords safe and maintain control over our access cards or visitor badges;
- ✓ Allow visitors controlled access to our sites, recording their entry to the site and verifying who they are;
- ✓ Investigate and effectively respond to security-related incidents;
- ✓ Identify and assess opportunities for continuous improvement in our approach to security; and
- ✓ Say something if we observe a security breach or potential security risk.

WE NEVER

- x Leave equipment or facilities unlocked;
- x Share our passwords or leave ID cards or visitor badges in easy reach of others; nor
- x Allow visitors access to our sites without recording their entry to the site and verifying who they are.

PROTECTING THE ENVIRONMENT

OUR PRINCIPLE

We are committed to excellence in environmental performance and maintaining effective environmental controls as an integral component of how we manage our operations.

WHAT DO WE MEAN?

Where possible, we promote sustainable resource use in our operations and are committed to participating in the development and promotion of sustainable resource use by providing innovative solutions for our customers.

Our aim is for customers and investors to choose us because we contribute to more sustainable solutions.

By looking for sustainability initiatives, we will deliver additional benefits to our business and to society. This is the right thing to do.

Each one of us also has a role to play. Through our decisions, we can offer more sustainable solutions, minimising our impact on the environment.

OUR COMMITMENTS

- // Identify, assess and respond in an appropriate manner to any environmental risks;
- // Integrate environmental risk assessment into our decision-making and operational activities;
- // Comply with applicable environmental regulations and standards and those set by our contractual requirements;
- // Actively seek and develop sustainable resource solutions for our clients;
- // Reduce our environmental footprint and be active contributors to climate change solutions by minimising emissions, water use and waste generation; and
- // Communicate with key stakeholders on environmental issues in a transparent and timely manner.

KEY POLICIES & MORE INFORMATION

- // Health, Safety and Environmental (HSE) Policy;
- // Sustainability Policy; and
- // Our managers or health and safety representatives.

WE ALWAYS

- ✓ Find ways to minimise environmental impacts associated with our work and suggest positive environmental action or practices;
- ✓ Say something if we observe potential or actual environmental incidents;
- ✓ Follow the environment rules, practices and procedures that apply to our jobs;
- ✓ Seek out sustainable resource solutions where possible; and

- ✓ Eliminating hazards and reduce risks by implementing appropriate hazard identification and controls to manage our environmental responsibilities and risks.

WE NEVER

- x Perform work that poses an undue environmental hazard or that cannot be appropriately managed.

OUR PEOPLE

WE VALUE PEOPLE

Our People Are The Cornerstone Of Our Business.

Our aim is to ensure that our employees are engaged, committed, and fulfilled in their roles by providing solutions focused on employee performance, development and wellbeing.

We develop and share information, knowledge and expertise.

We identify with DRA's mission, purpose and values on a personal level.

- // Acting safely and responsibly in the workplace
- // Inclusion and diversity in the workplace
- // Developing our people
- // Supporting human rights
- // Relationships with communities



ACTING RESPONSIBLY IN THE WORKPLACE

OUR PRINCIPLE

We value teamwork as an important part of our success. In working together, we treat each other with respect, courtesy, and fairness. We do not tolerate bullying, harassment, or discrimination.

WHAT DO WE MEAN?

We maintain a workplace free of intimidation, harassment, bullying and unacceptable conduct and don't tolerate such behaviour by a director, employee, contractor, customer, supplier or any person we deal with as part of our work. We take action to address such behaviour if we are aware of it.

We do not condone unprofessional behaviour. This includes behaviour that can be perceived as bullying, discrimination or a form of intimidation or humiliation, nor do we tolerate hostile behaviour or any form of sexual harassment. Anyone engaging in unacceptable behaviour will be subject to discipline, up to and including termination.

Bullying and harassment is any conduct, whether made verbally, non-verbally or through any other means of communication, that denigrates or shows hostility or aversion towards an individual or a group of individuals with the purpose or effect of:

- // Creating an intimidating, offensive or hostile work environment;
- // Unreasonably interfering with an individual's work performance; or

- // Sexual harassment, including unwelcome sexual advances, requests for sexual favours and other verbal, written, emailed or physical conduct of a sexual nature.

Discrimination means treating an individual person or group based on factors such as age, race, religion, national or ethnic origin, colour, gender, sexual orientation, gender reassignment, marital status, disability unrelated to the task in hand, union membership or political affiliation. This is not necessarily an all-inclusive list and factors could vary based on the laws of the countries where we work.

Examples of inappropriate behaviour include:

- // Name-calling, ridicule or mockery;
- // Making inappropriate jokes or comments. If we are unsure whether something is inappropriate, assume that it is;
- // Unwanted physical contact, assaults or threats, intimidation, stalking or spying;
- // Isolating or excluding an employee from social activities, meetings or conversations;
- // Coercion for favours; and
- // Bullying or deliberately setting unrealistic targets and/or deadlines, public criticism, undervaluing effort and substituting responsible tasks with menial or trivial ones.

WHAT DO WE DO IF WE OBSERVE SUCH BEHAVIOUR?

If we believe this is happening to ourselves (whether by another team member, a customer or anybody else in our workplace), or if we think that this is happening to someone else, there are informal and formal ways to address this properly. Options include:

- // Speaking to the person in question if we feel comfortable and safe doing so;

- // Speaking to our team leaders, a more senior manager or our human resources representatives; and
- // Contacting our Speak-Up Service.

GAMBLING

Wagering, gambling, or playing other games of chance in the workplace is prohibited and detracts from productivity in the workplace.

KEY POLICIES & MORE INFORMATION

- // Respectful Workplace Policy and Standard; and
- // Our managers, human resources representatives or health and safety representatives.

WE ALWAYS

- ✓ Treat others respectfully and professionally;
- ✓ Speak up and do something about bullying, harassment or discrimination;
- ✓ Support others who may be affected by workplace bullying and harassment and challenge those that may be engaging in conduct that breaches this standard; and
- ✓ Respectful of our cultural differences.

WE NEVER

- x Accept any kind of discrimination;
- x Make inappropriate jokes or humiliate anyone or spread gossip and rumours;
- x Sexually harass anyone. Sexual harassment includes sexual advances, inappropriate references or conduct of a sexual nature; nor
- x Verbally abuse, threaten, taunt, intimidate or bully anyone.

INCLUSION AND DIVERSITY IN THE WORKPLACE

OUR PRINCIPLE

We value inclusion and diversity, equal opportunity, working together, sharing knowledge and supporting each other. We treat everyone equally and embrace difference.

WHAT DO WE MEAN?

We promote inclusion and diversity and are respectful and fair in the way we work with our colleagues, customers and our communities.

We value inclusion and diversity and the benefits they bring to us in achieving our objectives, enhancing our reputation, and attracting, engaging, and retaining talented people.

Diversity means a difference in all its forms, and includes differences that relate to gender, age, cultural background, disability, religion and sexual orientation, as well as differences in background and life experience, and interpersonal and problem-solving skills.

The diversity of our people should reflect our diverse, global customers and the countries where we operate.

We also believe every employee should be recruited and promoted based on their ability, contribution and potential.

We do not tolerate discrimination on the basis of gender, age, race, religion or beliefs, ethnic or national origins, marital, sexuality or disability.

OUR COMMITMENTS

- // Promote a culture of fairness, respect, diversity and inclusion for all;
- // Aspire to have our people reflect the communities we operate within;
- // Embrace inclusion and diversity in our recruitment and job promotion activities at all levels;
- // Value and respect the skills, experiences, and perspectives each person brings to our workplace;
- // Creating an inclusive, productive, and safe workplace by taking action to prevent and stop discrimination, harassment, and bullying; and
- // To assist our people in achieving a holistic balance between life and work.

KEY POLICIES & MORE INFORMATION

- // Inclusion and Diversity Policy and Standard; and
- // Our managers or human resources representatives.

WE ALWAYS

- ✓ Base all work-related and employment decisions on merit, potential and performance; and
- ✓ Are respectful of cultural differences.

WE NEVER

- x Disrespect anyone's culture or beliefs; nor
- x Disqualify a candidate because of their gender, age, cultural background, religion or sexual orientation.

DEVELOPING OUR PEOPLE

OUR PRINCIPLE

We promote employee development to ensure that our employees are achieving their best.

We drive a learning culture throughout all aspects of our business.

Our graduate programs serve as an incubation hub for early talent.

WHAT DO WE MEAN?

Developing our people is the best way to improve and grow our business.

All of our decisions about recruitment, hiring, remuneration, training and development and promotion must be based on the person's ability, skills, experience, behaviour, performance and potential to do the work, recognising our obligations and commitments under applicable country legislation.

By employing the best people for the job and creating a work environment in which they can develop, we will achieve our business objectives.

We also recognise that our workforce needs are better met by supporting the recruitment and development of learners or apprentices within our operations.

OUR COMMITMENTS

- // Build leadership excellence;
- // Develop a leadership pipeline and succession plan for leadership roles;
- // Employ people who will uphold our values and our standards of ethical conduct;
- // Encourage and support all our people to achieve their best;
- // Identify and satisfy training and development needs so our people can perform and develop their potential, including up-skilling people to support the growth of the business; and
- // To have a fair system of recognition, remuneration and promotion.

KEY POLICIES & MORE INFORMATION

- // Inclusion and Diversity Policy and Standard;
- // Talent Management Standard;
- // Performance Management Standard; and
- // Our managers or human resources representatives.

WE ALWAYS

- ✓ Strive for excellence;
- ✓ Encourage self-learning;
- ✓ Promote coaching and mentoring;
- ✓ Build succession in line with the needs of the business; and
- ✓ Promote employees based on merit.

WE NEVER

- x Seek to remunerate unfairly; nor
- x Promote employees unfairly.



SUPPORTING HUMAN RIGHTS

OUR PRINCIPLE

We respect human rights and understand that promoting human rights are fundamental for carrying out our business.

We prevent and address any adverse human rights and associated impacts arising from our operations.

WHAT DO WE MEAN?

We support the protection of fundamental human rights and freedoms and abide by the international principles encompassed in the [United Nations Guiding Principles on Business and Human Rights](#).

Human rights are the basic standards of treatment to which everyone is entitled, regardless of race, nationality, gender, religion or economic status.

We aim to limit the risk of labour abuses in our supply chains and operations and honour the rights of our employees and contractors as well as the workers engaged by our third parties to:

- // Freedom of association and collective bargaining;
- // Health, safety and security in the workplace;
- // No child labour, forced labour, human trafficking and the principal that employment is freely chosen;
- // Fair work hours, wages, benefits and contracts; and
- // Access to fair procedures and remedies.

In respecting the human rights of community stakeholders, we respect their right to food, shelter and water, their freedom to move and their right to adequate housing. In particular, we recognise the rights of historically disadvantaged and indigenous people and acknowledge that displacing people from their homes, land and communities is a gross violation of human rights.

We establish community grievance mechanisms through which stakeholders can raise grievances regarding their treatment or the impact of our operations on them.

OUR COMMITMENTS

- // Support all the principles set out in the United Nations Guiding Principles on Business and Human Rights;
- // Work in a way that respects the human rights of all people that are touched by our operations. This includes working to ensure that slavery and human trafficking aren't taking place in our business, supply chain or business partners;
- // Encourage our employees and suppliers to identify any person they think may be at risk from these practices and to help us to help those people at risk;
- // Protect and promote basic human rights wherever we operate;
- // We all have specific responsibility to report any suspicions of Human Rights or Modern Slavery abuses taking place within our operations and projects or its supply chain; and
- // We support the United Nations' Universal Declaration of Human Rights and are committed to protecting the environments of the regions where we operate.

KEY POLICIES & MORE INFORMATION

- // Sustainability Policy;
- // Human Rights and Modern Slavery Standard;
- // Modern Slavery Statement; and
- // Our managers or human resources representatives or health and safety representatives.

WE ALWAYS

- ✓ Respect, protect and promote human rights;
- ✓ Reject any form of slavery, child labour, forced labour or human trafficking; and
- ✓ Work to align our business practices with the United Nations Guiding Principles on Business and Human Rights.

WE NEVER

- x Treat our people and the communities in which we operate unfairly or in a discriminatory manner;
- x Engage with third parties who do not follow and respect human rights; nor
- x Fail to acknowledge the rights of indigenous people or disrespect their cultures or communities.

RELATIONSHIPS WITH COMMUNITIES

OUR PRINCIPLE

We recognise the importance of, and are committed to establishing and maintaining, lasting and positive relationships with the communities within which we operate.

WHAT DO WE MEAN?

We acknowledge our role in contributing to the social and economic development in the locations where we work and our values guide these interactions.

We aim to support community programs that support local people, businesses and community need projects that are aligned with our values.

We are open to two-way communications with local communities and support the social and economic benefits by creating local jobs and, wherever practical, using the local goods and services.

We are never complacent about how we operate and the effect that our activities can have on local individuals and their community. We listen, we care about the issues of people we work with and whenever and wherever we can, we act on them.

OUR COMMITMENTS

- // We will continue to develop strong and long-lasting relationships with our local and regional host communities; and
- // We support community engagement initiatives aimed at employing, procuring and building capacity within the host communities in which we operate.

KEY POLICIES & MORE INFORMATION

- // Sustainability Policy;
- // Delegation of Authority Standard; and
- // Our managers or human resources representatives.

WE ALWAYS

- ✓ Act as a responsible member of the communities in which we work;
- ✓ Engage regularly, openly and honestly with all community stakeholders affected by our operations and take their views into account;
- ✓ Understand our impact on local communities and work together to create positive outcomes from our involvement;
- ✓ Respect the traditions, culture, laws, heritage, values, views and rights of the communities where we work; and
- ✓ Follow DRA's policies for making charitable contributions, including providing funding for community programs. Each contribution must be approved in advance pursuant to our procedures.

WE NEVER

- x Disrespect our host communities, their heritage and customs.



SAFEGUARDING OUR PROPERTY

WE VALUE COURAGE

We actively lead the change to do what is right.

We talk honestly, and are prepared to have difficult conversations where appropriate. We always take responsibility and accountability for our actions.

We anticipate change and have the courage to present new, forward-thinking ideas and plans.

We are open to innovation, thinking out-of-the-box and making a difference.

- // Company Property and Intellectual Property
- // Keeping information confidential
- // Protection of privacy & personal information



COMPANY PROPERTY & INTELLECTUAL PROPERTY

OUR PRINCIPLE

We are all responsible for protecting DRA property against damage, fraud, theft, waste, loss, or misuse and ensuring that DRA property is used efficiently and for business purposes only.

We value the creation and protection of knowledge and Intellectual Property.

WHAT DO WE MEAN?

We are expected to use DRA's property only for the purposes of carrying out our responsibilities and in a way the assets are designed to be used.

Unauthorised removal of DRA's property is regarded as theft. DRA's property must not be sold, lent or donated without appropriate approval as per our Delegation of Authority Standard.

We must return all DRA property and Intellectual Property when we leave.

We have a duty to protect our Intellectual Property. Subject to applicable laws, any inventions or discoveries made by employees during the course of their work is DRA's property.

DRA's property - includes all forms of property and can be categorised into **physical** and **Intellectual Property**.

Physical Property - includes property such as plant, equipment, tools, vehicles, machinery, computers, personal devices, telephones and supplies.

Intellectual Property - includes property that was created through creativity such as confidential information, commercially sensitive information, trade secrets, software, patents, copyright, business names and trademarks and branding.

OUR COMMITMENTS

- // Trust our people to look after DRA Property; and
- // Provide our people with resources that are safe to use and fit for purpose, allowing us to strive for excellence.

KEY POLICIES & MORE INFORMATION

- // Company Property Policy and Standard; and
- // Our managers, human resources or legal representatives.

WE ALWAYS

- ✓ Use DRA's property responsibly and for authorised business purposes only. Unauthorised removal of property is regarded as theft;
- ✓ Take steps to reduce the risk of damage, unauthorised or inappropriate use of property and facilities and ensure it can't be damaged or stolen;
- ✓ Keep secure and protect DRA's property, physical and intellectual, and any property of our customers under our control and out of any possibility of being damaged or destroyed;
- ✓ Return DRA's property when we stop working; and
- ✓ Seek permission from management as soon as possible to take DRA's property from the workplace and ensure its removal is documented and is returned when it is no longer required outside the workplace.

WE NEVER

- x Deliberately damage DRA's property;
- x Use DRA's property for personal use or gain, and we Speak-Up if we suspect or learn that DRA's property is being misused by others;
- x Take any DRA property, no matter how small, inexpensive or damaged; nor
- x Use DRA's property in an inappropriate or unsafe manner.

KEEPING INFORMATION CONFIDENTIAL

OUR PRINCIPLE

We keep confidential information safe and ensure that it never gets into the wrong hands.

WHAT DO WE MEAN?

Any improper disclosure or misuse of confidential information about DRA can have a negative impact on DRA.

We must keep confidential information safe, only share it internally on a 'need to know' basis, and only disclose it to a third party under a contractual agreement and with appropriate authorisation to do so.

Confidential information belonging to joint ventures, customers, supplier, employee, contractors or other third parties must be respected and also protected in the same way.

Confidential information - is any and all confidential and/or proprietary information or material belonging to, or in possession of, any DRA entity. It may be oral, visual, in writing, or in any other form. It includes any information related to:

- // Financial, business plans, projections or strategies, property, business practices and relationships, processes, systems or methods of operation;
- // Specifications, technical information, pricing policies, costs, marketing plans or promotional activities;

- // Customer, supplier or employee information or terms of agreements; and
- // Know-how, trade secrets, inventions, innovations, improvements, or other proprietary information.

OUR COMMITMENTS

- // Provide our people with access to confidential information that is appropriate for them to fulfil their role; and
- // Trust our people to keep information confidential.

KEY POLICIES & MORE INFORMATION

- // Our managers, human resources or legal representatives.

WE ALWAYS

- ✓ Protect our confidential information and intellectual property by sharing it only with authorised persons. Sensitive and confidential information can be shared under a confidentiality agreement;
- ✓ We keep safe any information that may be commercially sensitive;
- ✓ Report confidential information received in error and return it to its rightful owner;
- ✓ Make sure customers, partners, suppliers and other third parties protect our confidential information; and
- ✓ Ask our legal representatives if there is any doubt about the use or disclosure of information.

WE NEVER

- x Leave sensitive and confidential information lying around or unsecured, or otherwise fail to take care of it;
- x Reveal or use confidential information learnt from a previous employer unless permitted to do so;
- x Discuss confidential information in a way that it can be overheard in public; nor
- x Exchange confidential information using unsecured techniques and technologies or without entering into a confidentiality agreement.

PROTECTION OF PRIVACY & PERSONAL INFORMATION

OUR PRINCIPLE

We recognise the importance of, and are committed to, protecting the privacy of the personal information of our people, customers and other people we work with.

We respect and safeguard the privacy of everyone and adhere to all legislation on data protection, including and not limited to the:

- // Australian Privacy Act 1988 (Cth);
- // European Union General Data Protection Regulation 2016/679; and
- // Data protection laws of any other country where our investors reside or where we conduct our business.

Personal information - is any information or an opinion about an individual that identifies them or from which their identity can be ascertained. Examples of personal information include birth date, gender, tax file number, bank account details, passport, government-issued identification, health records, employment history, photographs, driver's licences and other identification information.

WHAT DO WE MEAN?

Privacy laws regulate the collection, storage, disposal, use and disclosure of personal information which can identify a living person.

When executing the functions of our operations, we may collect personal information directly from individuals, including visitors to our website, people who contact us with enquiries, clients and employees of those clients, prospective clients, prospective employees, our suppliers and employees of those suppliers and investors.

We generally only use or disclose personal information for the primary purpose(s) for which it was collected (i.e. the employment relationship). We may also use personal information for a secondary purpose that is related to a purpose for which we collected it, provided we would reasonably expect us to do so. How we process personal information depends on the nature of our relationship with the individual and relevant legislation.

We only collect, retain and use personal information required for our legitimate interests or as permitted by privacy laws. Those with access to it must only use it in an authorised way.

We work to ensure appropriate standards of data protection are in place across all our businesses and that we comply with privacy laws.

CONTACT OUR COMPLIANCE OFFICER

DRA's Group Compliance Officer is responsible for management of data privacy. If we have any doubt about the handling of personal information or any queries relating to data privacy, we can contact DRA's Group Compliance Officer at complianceofficer@draglobal.com.

OUR COMMITMENTS

- // Comply with relevant privacy laws and only use information for its intended purpose; and
- // Maintain appropriate standards to protect data from unauthorised use and access.

KEY POLICIES & MORE INFORMATION

- // Privacy Standard;
- // Data retention standards; and
- // Our managers, human resources or legal representatives.

WE ALWAYS

- ✓ Protect personal information, keep it confidential and secure and promptly report any loss of information to our managers;
- ✓ Only collect and retain personal information that is necessary for business activities and only use it for the purpose for which it was collected;
- ✓ Make sure personal information is only shared with people who have a legitimate need to know or with the consent of those whose information we hold;
- ✓ Ensure personal information is securely deleted or destroyed when it is no longer required or in accordance with our document retention and disposal guidance; and
- ✓ Carry out recruitment in strict accordance with DRA's recruitment standards and procedures, which include telling potential employees we are collecting their personal information.

WE NEVER

- x Provide personal information to anyone (including our employees) or transfer it outside its country of origin without proper authorisation and provided it is permitted under privacy laws.

UPHOLDING SOUND BUSINESS PRACTICES

WE VALUE INTEGRITY

We always do what is right.

We demonstrate transparency in our actions and interactions.

We deliver on our promises.

We do the right thing for our customers and communities in an honest, fair and sincere way to make our customer's dreams a reality and practice the highest level of ethics in all of our business dealings.

- // Building trust with our stakeholders
- // Preventing bribery & corruption
- // Comply with our gifts, entertainment & hospitality standards, including reporting gifts, entertainment and hospitality
- // Safeguarding against fraud, deception & dishonesty
- // Avoiding conflicts of interest
- // Maintaining complete & accurate records
- // Securities dealing and inside information

BUILDING TRUST WITH OUR STAKEHOLDERS

OUR PRINCIPLE

We want to be trusted by our stakeholders we do business with.

We treat our stakeholders with integrity and professionalism at all times.

WHAT DO WE MEAN?

Our stakeholders include, but are not limited to, our employees, shareholders, customers, suppliers, partners, contractors and subcontractors, governments, regulators and the communities where we operate.

Relationships with our stakeholders need to be professional, honest and transparent and be conducted with integrity. This will help our stakeholders to trust us and have confidence in our business.

OUR COMMITMENTS

- // We are committed to the principles raised in this Code of Conduct and encourage all stakeholders to do the same;
- // As far as practicable, we will support and abide to the codes or conduct of our stakeholders; and
- // We are committed to open, transparent and collaborative working relationships.

KEY POLICIES & MORE INFORMATION

- // Ethics Policy; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Do what we say we will do;
- ✓ Develop and sustain strong, ethical and long-lasting relationships;
- ✓ Select organisations based on a fair and objective process with a clear understanding of the expectations of what is required;
- ✓ Keep our promises and fulfil contractual agreements openly, honestly and promptly;
- ✓ Work with stakeholders to resolve any disputes at the earliest opportunity;
- ✓ Communicate truthfully, clearly and regularly with stakeholders; and
- ✓ Have a clear understanding of what our customers require from us.

WE NEVER

- x Accept any practice that could jeopardise our operations, business or reputation; nor
- x Have any relationship between us and a supplier that could be perceived as a conflict of interest.

PREVENTING BRIBERY & CORRUPTION

OUR PRINCIPLE

We act with honesty and integrity and do not give or receive bribes or participate in corruption.

WHAT DO WE MEAN?

We care about our reputation and do not tolerate any form of bribery or corruption, either made directly or through third parties. This includes offering, giving or receiving bribes or improper payments, including facilitation payments, even if such practices are perceived as part of local business practice. An allegation of bribery can seriously damage our reputation. It is better to miss out on business than compromise our integrity.

We exercise caution when offering or accepting gifts and/or hospitality to ensure it is not perceived to influence a business outcome improperly.

We provide donations or sponsorships on behalf of DRA that are in support of legitimate purposes only.

We do not use our position, workplace or facilities to advance political causes or support political parties or members.

Bribery – may take many forms including offering, providing or receiving something of value such as cash, gifts, meals, hospitality or entertainment as an inducement or reward for something improper. Usually, but not always, it is to obtain or retain business or gain an illegitimate advantage.

Corruption – is dishonest or fraudulent practice to secure a benefit or a commercial advantage. This includes, bribery, extortion, fraud, deception, collusion, cartels, abuse of power, embezzlement or money laundering.

Facilitation payments – sometimes referred to as grease payments, facilitation payments are usually small payments or gifts generally made to junior or lower-level public officials to speed-up or “facilitate” actions that officials are duty-bound to perform. Facilitation payments may seem harmless if they are small in value, or part of local custom or culture and are regarded to be the way things are done; however, in most countries they are illegal and are forbidden by DRA.

WATCH OUT FOR

- // Requests for payments to a party unrelated to a transaction, or for payments in cash;
- // Individuals or agents who consider themselves valuable for their private links rather than their services or who ask for payment out of proportion to the value of their services;
- // Requests to engage persons, entities or agents without a written contract or without completing the requisite due diligence documentation; and
- // Requests for favours, hospitality or gifts that could be seen as lavish or inappropriate.

REPORT IT

- // Think something may be wrong? We all have a responsibility to prevent and help detect bribery and to raise any concerns through to our managers, legal representatives or via our Speak-Up Service.

OUR COMMITMENTS

- // Zero appetite towards bribery, corruption or the making of facilitation payments; and

- // Foster a Speak-Up culture, reporting any suspicion of bribery or corruption without fear of reprisal.

KEY POLICIES & MORE INFORMATION

- // Anti-Bribery & Corruption Policy and Standard; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Seek to avoid even the appearance of wrongdoing;
- ✓ Make sure that all of our clients, contractors and suppliers understand that we have the same expectations of them;
- ✓ Raise a concern whenever we become aware that a fellow employee or a third party may be attempting to improperly influence a decision of a (potential) customer, (potential) supplier or government official;
- ✓ Report any attempts to bribe us or ask bribes from us; and
- ✓ Speak-Up if we have any suspicions of bribery or corruption.

WE NEVER

- x Participate in any form of bribery or corrupt behaviour;
- x Give or receive gifts or hospitality that are excessive, inappropriate or have the potential to improperly influence, or be perceived to influence, a decision or outcome improperly;
- x Conceal or fail to record the real nature of transactions accurately and fully; nor
- x Pay more than fair market value for goods or services.

GIFTS, ENTERTAINMENT & HOSPITALITY

OUR PRINCIPLE

We make sure gifts and hospitality do not improperly influence a decision.

WHAT DO WE MEAN?

We do not take advantage of our positions or the opportunities arising from them, including the use of DRA information or resources for personal gain, or by passing such information to others.

To foster working relationships, employees may occasionally receive or give gifts, entertainment or hospitality.

If we are struggling to justify a gift or hospitality, it is probably not okay.

We should contact our legal representatives for further guidance or see the DRA's Anti-Bribery and Corruption Standard on the DRA Intranet for further information.

Hospitality – includes invitations to social functions, sporting events, meals and entertainment.

Gifts – can vary in type and are generally low value or customary tokens of appreciation.

Gifts, entertainment & hospitality – under no circumstances should we give or receive a gift, entertainment or hospitality if the purpose is to influence a decision improperly.

Any gifts or hospitality we receive or give should always be customary and reasonable in terms of value, frequency or timing.

Information on limits for gifts, hospitality and entertainment and guidance is available in **DRA's Anti-Bribery & Corruption Standard**. However, we should use our judgement to assess if the gift or hospitality received or offered is appropriate and importantly must not influence our decision.

Sponsored travel – the giving or receiving of sponsored travel and travel-related expenses is prohibited unless approved by the Managing Director or his delegate.

OUR COMMITMENTS

- // We are committed to ensuring our working relationships with our business partners are based on ethical behaviour and a high level of integrity; and
- // We maintain, and regularly update, a Gifts and Hospitality Register to demonstrate that gifts and hospitality do not improperly influence our decisions.

KEY POLICIES & MORE INFORMATION

- // Anti-Bribery & Corruption Policy and Standard;
- // Delegation of Authority Standard; and
- // Our managers, human resources or legal representatives.

WE ALWAYS

- ✓ Comply with the limit values for gifts, entertainment and hospitality and seek approval as required under DRA's Anti-Bribery & Corruption Standard;
- ✓ Ensure any approved gifts or hospitality received, given or declined is recorded in our Gifts and Hospitality registers;
- ✓ Check with customers and suppliers before giving any kind of gift or invitations to them as they may have rules requiring them to report or refuse gifts and hospitality; and
- ✓ Check with our managers or legal representatives before giving gifts or hospitality to public / government officials.

WE NEVER

- x Accept gifts, entertainment, or hospitality if we think it will impair judgement, inappropriately influence our decision or create a sense of obligation;
- x Request or ask for gifts, entertainment or hospitality; nor
- x Accept or give gifts, including gifts of cash or cash equivalent e.g. vouchers.

SAFEGUARDING AGAINST FRAUD, DECEPTION & DISHONESTY

OUR PRINCIPLE

We will not defraud or deceive anyone, act dishonestly or misuse DRA property or resources.

We safeguard DRA's property and resources.

WHAT DO WE MEAN?

Fraud is the wrongful or criminal use of DRA's assets or communication devices in order to intentionally deceive, including through material omissions, third parties or DRA for financial or other personal gain.

Employees or third parties doing business with DRA who engage in fraudulent activities will have their employment or business relationship with DRA terminated and expose themselves to criminal and civil prosecution.

We are all responsible for the property that belongs to DRA and need to make sure we use items properly and take care of any property we come into contact with.

REPORT IT

If we believe that theft or fraud is happening in our workplace, we should report it immediately to our manager or via our Speak-Up Service.

OUR COMMITMENTS

- // We do not engage in fraudulent activities and report any known or suspected instances thereof through the appropriate channels; and
- // We utilise all client and DRA property entrusted to us for the purpose it was intended.

KEY POLICIES & MORE INFORMATION

- // Ethics Policy;
- // Company Property Policy; and
- // Our managers, human resources or legal representatives.

WE ALWAYS

- ✓ Act honestly, fairly and openly;
- ✓ We keep secure and protect DRA's property and any property of our customers under our control;
- ✓ Make sure our accounts and financial records are accurate and not misleading;
- ✓ Base all invoices on clear and complete information and check that our contractual arrangements are complied with;
- ✓ Speak-Up if we suspect something might involve fraud, theft, deception or dishonesty; and
- ✓ Take care when spending DRA's money or when making financial commitments on DRA's behalf.

WE NEVER

- x Falsify DRA's expenses or submit claims expenses that are not associated with carrying out our work or business;
- x Never take any DRA property, no matter how small, inexpensive or damaged;
- x Use DRA's money or resources for non-work-related activities or for an improper purpose;
- x Withhold payment when we don't honestly believe we are entitled to do so; nor
- x Make false claims.

AVOIDING CONFLICTS OF INTEREST

OUR PRINCIPLE

We must avoid situations and disclose conflicts of interest between DRA and ourselves.

WHAT DO WE MEAN?

A conflict of interest occurs when our relationships, participation in external activities or interest in another business venture influence or conflict with our duties and responsibilities to DRA.

Conflicts of interest also arise when we find ourselves in a position where two or more interests compete, potentially compromising our judgement or independence. Usually, the conflict is about individuals benefiting at the expense of DRA or another. Very often, perceptions of a conflict of interest can be just as harmful as an actual conflict of interest.

We must take great care not to involve ourselves in anything that can give rise to a conflict between our interests and those of DRA.

As soon as we realise there is a potential conflict, we must disclose it and seek approval or guidance.

If we are in doubt, we should consult our managers or legal representatives for further guidance.

WATCH OUT FOR

Common conflicts of interest include:

- // Proposing a close friend or relative as a supplier or contractor, without disclosing our relationship;
- // Proposing a company in which we have a financial interest as a supplier or contractor; and
- // Doing work for a customer or supplier.

OUR COMMITMENTS

- // We take all reasonable steps to avoid real, perceived or potential conflicts of interest. If such conflicts arise, we report them to our managers and manage them by giving priority to our duties and responsibilities to DRA; and
- // We keep and regularly update a register of all direct and indirect interests which the Company Secretary determines could give risk to an actual, potential or perceived conflict of interest.

KEY POLICIES & MORE INFORMATION

- // Ethics Policy;
- // Conflict of Interest Standard; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Avoid business dealings and personal relationships that cause or could cause a conflict of interest (actual or potential), or that would create the appearance of a conflict of interest;
- ✓ Say something to our managers if there is any conflict of interest or something which creates the appearance of a conflict of interest;

- ✓ Withdraw from decision-making that creates, or could be perceived to create, a conflict of interest;
- ✓ Take great care with contracts between DRA and a family member, friend, or company/business they own and notify our managers in writing and abstain from the decision-making process; and
- ✓ Obtain the appropriate approval from our managers if we plan on being involved in any external business or professional activities.

WE NEVER

- x Use our position, contacts or any knowledge gained at work for personal gain or to benefit family or friends;
- x Pay anyone more than a contractually agreed, market-based value or rate for goods or services;
- x Accept a benefit that could impair our judgement or independence or be open to misinterpretation; nor
- x Participate in business activities outside of work if the activities could adversely affect our ability to carry out our duties and responsibilities.

MAINTAINING COMPLETE & ACCURATE RECORDS

OUR PRINCIPLE

We ensure all DRA financial information, reports and records are complete and accurate.

WHAT DO WE MEAN?

Our accounts and financial records are a valuable asset and must be properly maintained. Our business partners, governments and the public rely on us to keep correct records. They are an essential part of doing business correctly, honestly and openly.

Many serious offences involve falsifying or tampering with the accounts / financial records or failing to account for an activity properly. Some serious offences start out as attempts to cover up relatively minor offences.

If our role involves the preparation and maintenance of accounting records of any kind, we must adhere to the guidelines set out by the Chief Financial Officer and applicable accounting and finance procedures and DRA's accounting policies.

DRA's records include contracts, diary notes, statutory records, audit reports, financial information, corporate policies, employee records, guidelines & procedures, operational reports, minutes of meetings and injury/incident investigations.

REPORT IT

Think something may be wrong?

Immediately report if we think something is wrong or there is an irregularity in DRA's books, records, reports or invoices, or a weakness in any of our accounting or record keeping systems. We should report it to our managers, legal representatives or to our Speak-up Service.

OUR COMMITMENTS

- // Always do what is right; and
- // Diligently record all known transactions.

KEY POLICIES & MORE INFORMATION

- // Ethics Policy;
- // Conflict of Interest Standard; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Ensure all transactions are recorded accurately and in accordance with accounting standards and DRA's procedures;
- ✓ Comply with our internal financial controls and only authorise transactions within our delegated authority;
- ✓ Record transactions accurately in the correct accounting period, ensure they are supported by detailed proof and specific approval has been received; and
- ✓ Comply with our document retention and disposal standards.

WE NEVER

- x Record transactions in the wrong way or place, even if the customer or other persons want us to;
- x Intentionally fail to record any transaction or expenditure or record it in an unclear or misleading way; nor
- x Alter or destroy any records or data that must be kept for litigation, an investigation or other legal reasons.

SECURITIES DEALING AND INSIDE INFORMATION

OUR PRINCIPLE

Inside information or confidential information may not be used for personal benefit. Each of us is prohibited from dealing in securities or from “tipping” others to deal in DRA securities or other companies securities, whilst in possession of price-sensitive information.

Inside Information or price-sensitive information – is information which is not public and which may have a material effect on the price (up or down) of securities. Dealing in securities while in possession of such information is referred to as insider trading and is a criminal offence.

Deal or dealing includes buying or selling securities, creating a hedge, security interest, margin loan or other financial interest over or in relation to securities, exercising options over securities, transferring legal ownership of securities (even where beneficial ownership does not change) and any other transfer or creation of an interest in securities.

Securities – includes shares, options, notes, bonds and other debentures, interests in managed investment schemes, trusts and other financial products, and any derivatives of those securities, including equity swaps, contracts for difference, futures, hedges and exchange-traded or over-the-counter options, whether settled by cash or otherwise.

WHAT DO WE MEAN?

It is a serious criminal offence to buy or sell DRA securities or those of any other company on the basis of inside information. This is insider trading.

- // If we have ‘inside information’, we or our connected persons must not:
 - / Deal in DRA securities or other securities to which the inside information may be price-sensitive;
 - / Procure, advise or encourage another person to deal in such securities in any way; or
 - / Pass on inside information to another person who may use it to deal in such securities.

We should not buy or sell DRA securities if it could be perceived by the market that we are taking advantage of our position in an inappropriate way.

It makes no difference whether we do it ourselves or get someone else to do so, or whether it is for our own or anyone else’s benefit. And it applies even after we’ve stopped working for DRA.

RESTRICTED PERSONS DEALING IN SECURITIES

Additional securities trading restrictions are imposed on Directors, senior management, certain head office staff and other designated people from time to time, and their closely connected persons (“**Restricted Persons**”).

Restricted Persons may not deal in DRA securities during specified ‘closed periods’.

Restricted Persons must obtain written approval before dealing in DRA securities, in accordance with the **DRA’s Securities Trading Standard**.

OUR COMMITMENTS

- // Only trade in DRA or other securities when appropriate to do so; and
- // Report any instances of suspected insider trading to the Company Secretary immediately.

KEY POLICIES & MORE INFORMATION

- // Securities Trading Policy and Standard; and
- // The Company Secretary and/or legal representatives.

WE ALWAYS

- ✓ Make enquiries with DRA’s Company Secretary and obtain prior written approval (if required) before we, or our connected persons, deal in DRA securities or other securities, where we may possess Inside or price-sensitive information.

WE NEVER

- x Deal in DRA securities or any other company securities, or encourage others to do so, if we have inside information or know something, which is price-sensitive;
- x Communicate or disclose price-sensitive information to any person; nor
- x Deal in DRA securities during “closed periods” if we are, or believe we may be, Restricted Persons subject to trading restrictions.

DEALING RESPONSIBLY WITH THIRD PARTIES

WE VALUE TRUST

We deliver on our promises.

We respect everyone.

We engage with and show care and consideration.

We listen to what people are saying and take their best interests to heart.

We care about the impact of our activities and actions and cooperate, share information, and work effectively together.

- // Treat customers and business partners fairly
- // Competing fairly
- // Governments, lobbying and political activity



TREAT CUSTOMERS AND BUSINESS PARTNERS FAIRLY

OUR PRINCIPLE

We treat our customers and business partners fairly.

We work to understand and meet our customers' business needs, while always remaining true to our values.

WHAT DO WE MEAN?

We treat customers and other business partners fairly, respectfully and honestly. We work to understand and meet our customer's business needs, while always remaining true to our own ethical standards.

We always tell the truth about our services, capabilities, and compensation. We do not make promises we cannot keep. In short, we treat our customer, suppliers, and other business partners as we would want to be treated.

We always value all our customers and work to achieve their goals.

We keep our customer information secure from unauthorised access and disclosure in order to build and maintain our customers' trust.

We promote a culture of innovation to create solutions for our customers, improve the way we work and generate value.

Our suppliers and business partners are an important part of our ability to be successful. It is therefore vital that we carefully choose who we work with and on an objective basis.

OUR COMMITMENTS

- // We respect our customers and provide the professional service which they expect of DRA and all its people;
- // We ensure we understand our customers' needs and wants and strive to exceed customer expectations;
- // We ensure that we are customer centric and continuously focus on building good customer relationships; and
- // We fulfil our duty of care.

KEY POLICIES & MORE INFORMATION

- // Ethics Policy; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Act responsibly towards customers and business partners and conduct fair and honest relationships with high ethical standards, ensuring each has a positive experience;
- ✓ Document the terms of relationships and engagements according to DRA's procedures;
- ✓ Clearly communicate our expectations to our business partners, agreeing on contractual obligations where applicable. We take action, where appropriate, if those expectations or obligations are not met;

- ✓ Say something if we suspect a customer or business partner is not complying with the law or their contractual obligations;
- ✓ Promptly report any concern about a potential error, omission, missed deadline or defect in quality, to our managers;
- ✓ Develop and deliver services and products according to our procedures and standards of quality; and
- ✓ Report actual or potential legal claims and lawsuits to our managers or legal representatives.

WE NEVER

- x Give in to the temptations to tell customers what we think they want to hear rather than the truth;
- x Engage in a request by an employee of a customer for an arrangement that personally benefits the employee rather than the customer;
- x Follow a customer's request to do something unethical or illegal or that could harm our reputation; nor
- x Give in to pressure from anyone to cut corners on quality or delivery standards.

COMPETING FAIRLY

OUR PRINCIPLE

We compete honestly, vigorously and fairly for business – not by engaging in improper or anti-competitive practices.

We will comply with all laws related to competition, antitrust and obtaining competitive information in the countries where we choose to do business.

IMPROPER AND ANTI-COMPETITIVE PRACTICES

Many countries around the world have competition or anti-trust laws. These laws prohibit a variety of business practices that restrict free and fair competition.

Violations of competition laws are very serious and may lead to criminal or civil prosecution. They can also result in damage to our reputation and large fines against us.

Competition laws are not always straightforward. If in doubt, we should consult with our legal representatives.

WHAT DO WE MEAN?

We are committed to the principles of free and fair competition and compliance with all applicable competition laws.

Competition laws aim to prevent any business activity that unreasonably restrains free trade and limits competition.

We must never engage in improper or anti-competitive practices, such as:

- // **Collusion / cartel behaviour** – when companies secretly communicate or agree on how they will compete.

- // **Bid or tender rigging** – when companies manipulate bidding to limit fair competition.
- // **Price-fixing** – any arrangement amongst competitors to raise or fix prices.
- // **Market sharing** – when companies agree to share, allocate or divide customers, geographic locations or markets.

REPORT IT

Think something may be wrong?

We should report any suspicions or allegations of possible anti-competitive behaviour to our managers or legal representatives or to our Speak-Up Service.

OUR COMMITMENTS

- // We compete fairly, ethically, and comply with applicable local laws; and
- // We are transparent in our dealings with clients so that they fully understand our services offering and pricing before signing a contract.

KEY POLICIES & MORE INFORMATION

- // Fair Competition Policy and Standard; and
- // Our managers or legal representatives.

WE ALWAYS

- ✓ Conduct ourselves in compliance with competition laws in all dealings with our competitors, customers, suppliers and other business partners;
- ✓ Take great care when dealing with competitors. Any kind of collusion, agreement with a competitor or customer, e.g. to use or not to use a certain supplier or subcontractor, can raise competition concerns;

- ✓ Report any suspicions or allegations of possible anti-competitive behaviour to our managers or legal representatives; and
- ✓ Notify immediately our legal representatives if we receive confidential information that we should not have obtained, e.g. a competitor's tender information.

WE NEVER

- x Collude with a competitor by agreeing to fix prices or terms, limit supply, rig a bid or coordinate tendering activities, allocate clients, geographic locations or markets, or boycott a customer;
- x Exchange sensitive information with a competitor or other parties as it can give the appearance of an inappropriate agreement or understanding. Sensitive information may include pricing, contract negotiations, capacity, production costs, commercial strategies or plans, bidding intentions, customers and markeshare;
- x Share information or engage in conversations with a competitor about competitively sensitive information – a conversation with a competitor may be a breach of competition law; nor
- x Participate in trade, industry or groups that become a forum for improperly exchanging competitively sensitive information.

GOVERNMENTS, LOBBYING & POLITICAL ACTIVITY

OUR PRINCIPLE

We are committed to working with the governments of the countries we operate in.

We comply with the processes and procedures put in place by those governments and, at all times, act with integrity and the highest ethical standards.

We do not participate in party political activities.

WHAT DO WE MEAN?

Our business is directly impacted by the decisions governments make. Governments have detailed processes and procedures prohibiting the offering of money or other benefits to public officials, providing gifts and hospitality to public officials and other conduct which may impair how those governments make their decisions. We seek to have an open and ethical relationship with the governments of the countries we work in.

The laws on lobbying and working with governments are complex and differ between countries. Whenever we represent DRA, we must take great care about what we say, do or support in the public or political domain.

Any political contribution or donation given on behalf of DRA needs the approval of the Managing Director of DRA and will not be approved unless it complies with relevant laws and regulations. Contributions may be cash or non-cash, such as the use of DRA's facilities, resources or employee time.

We have the right to participate in a democratic process personally but we must take care that our participation is on a personal basis only and that actions are not taken to be those of DRA.

DRA's Anti-Bribery & Corruption Policy sets out the expectations for how we should conduct ourselves when working with governments.

REQUESTS FROM GOVERNMENT OR REGULATORY AUTHORITIES

If we receive a request for information from a government agency or regulatory authority, we must forward it to the Group Legal Counsel.

OUR COMMITMENTS

- // We do not participate in party political activities; and
- // We comply with all laws on lobbying and working with governments.

KEY POLICIES & MORE INFORMATION

- // We do not participate in party political activities; and
- // We comply with all laws on lobbying and working with governments.

WE ALWAYS

- ✓ Follow applicable DRA procedures regarding communication with governments, regulators and public authorities;

- ✓ Ensure that all information provided to any government, regulator or authority is accurate and appropriate;
- ✓ Cooperate with every legitimate government request for information; and
- ✓ Say something if we are planning on engaging in political activity or accepting a political role that may impact DRA.

WE NEVER

- x Engage public or government officials to provide services without approval from the Managing Director;
- x Offer gifts, entertainment, travel and hospitality to the spouses, family members or guests of a government official;
- x Engage in any political activity on behalf of DRA or give the impression our political views are those of DRA; nor
- x Make or use another person or agent to represent DRA or make a political donation on behalf of DRA.

ACTING WITH PROFESSIONALISM IN OUR COMMUNICATIONS

WE VALUE EXCELLENCE

We strive to be better than yesterday

We work better, smarter and more efficiently and create sustainable customer value by fulfilling our customer's needs.

We spend time talking about excellence.

We focus on what is most important and make a point to look for ways to improve processes to obtain better results.

- // Communicating with others and public communications
- // Communicating on social media
- // Using computer system resources and data
- // Communications with shareholders and investors



COMMUNICATIONS WITH OTHERS & PUBLIC COMMUNICATIONS

OUR PRINCIPLE

We are committed to open, honest and professional communications, both internally and externally.

We take care in all our communications, internally, externally, formally or informally.

WHAT DO WE MEAN?

Communication with Others

When we communicate with others we should be truthful, proud and ethical in our dealings with others.

All employees are expected to communicate with colleagues and others in a respectful and professional manner using appropriate, professional language, both in written and verbal communications.

Public Communications

The Managing Director is the only authorised spokesperson for DRA and the Chairman of the Board is the spokesperson for the Board.

Employees are prohibited from communicating with the media or making public statements on behalf of DRA, including on social media, without the requisite prior written approval.

Employees must seek prior approval from the relevant Executive Vice-President before presenting or publishing technical papers, making presentations on DRA's business, speaking at conferences or other public gatherings or any other communications to the public.

Employees are required to understand how we communicate externally and who can make public statements. If we are unsure, we should speak to DRA's Marketing and Communications department.

MEDIA ENQUIRIES

Interactions between DRA and the media must only occur via the right channels and that information provided is accurate and consistent.

All employees must refer media enquiries to DRA's Marketing and Communications department.

OUR COMMITMENTS

- // Our communication will always adhere to the highest standards and be honest, respectful and unambiguous.
- // All communications are appropriate and consistent and have the necessary prior written approval.

KEY POLICIES & MORE INFORMATION

- // Market Disclosure and Communications Policy and Standard; and
- // DRA's Marketing and Communications department.

WE ALWAYS

- ✓ Refer media and communications enquiries to DRA's Marketing and Communications department;
- ✓ Contact the relevant Executive Vice-President if a crisis or event occurs that attracts media interest;
- ✓ Are factual, professional and respectful in email and other written or electronic communications; and
- ✓ Seek approval from DRA's Marketing and Communications department before making any public communication.

WE NEVER

- x Provide information about our business activities to media, shareholders, industry analysts or researchers;
- x Speak to the media on issues involving DRA; nor
- x Post or publish any information about DRA.

COMMUNICATION ON SOCIAL MEDIA

OUR PRINCIPLE

When we engage in social media use, we act responsibly.

All guidance regarding “Communications with others & public communications” applies equally to any communications published on social media.

WHAT DO WE MEAN?

Our reputation and brand are very valuable assets and need to be maintained.

Our reputation is important to attracting employees, investors, clients and further business. Therefore, it is essential that we don't do anything that damages our reputation.

We acknowledge that many employees use various forms of social media in their personal capacity (i.e. Facebook, YouTube, Twitter, LinkedIn, blogs, forums etc.). We need to be aware of the impact of our personal use of social media and how it may affect the DRA's reputation and brand.

An employee who engages in on-line communication must follow all guidelines related to “Communications with others & public communications” and specifically not make disparaging comments or post disparaging images about DRA, our customers and/or its employee. For the avoidance of doubt this includes interactions with DRA's own social media communications and/or publications.

Social media can be described as all on-line media communication platforms which allow for user participation

and/or interaction. This includes, but is not limited to, social networking sites (e.g. Facebook, MySpace, Bebo), video sharing sites (e.g. Flickr, YouTube, Blip, Instagram, Tik-Tok), micro-blogging sites (e.g. Twitter, Yammer), discussion forums (e.g. TroveForum, Yahoo! Groups, Google Groups) and any other web sites that allow users to publish comments and/or images (e.g. wikis).

OUR COMMITMENTS

- // To ensure DRA posts are informative, direct, and brief and add value and not be misleading;
- // Respect DRA's brand and uphold DRA's reputation in all social media communications or interactions;
- // Adhere to DRA's guidelines on “Communications with others & public communications” when using social media; and
- // Not to disclose any private information around DRA or individuals.

KEY POLICIES & MORE INFORMATION

- // Social Media standards;
- // Marketing and Communications standard; and
- // DRA's Marketing and Communications department.

WE ALWAYS

- ✓ Refrain from disclosing any confidential DRA information concerning our business operations or about an employee or customer; and
- ✓ Ensure that any comments that are made on social media are professional and positive.

WE NEVER

- x Criticise the business, our customers, and/or their employees in a public way;
- x Post on-line communications which are defamatory, rude, offensive, discriminatory or threatening, publicises or comments on workplace disputes, or has the potential to adversely impact the professional reputation and/or the productivity of DRA;
- x Post or disclose any inside or price-sensitive information or any confidential information; nor
- x Use any DRA or other entities' logo.

USING COMPUTER SYSTEMS AND DATA

OUR PRINCIPLE

DRA's computer systems are for use at work. We are allowed to use computer systems reasonably and appropriately for personal use.

WHAT DO WE MEAN?

Our information technology systems, programs and data are very important to us and must, at all times, be used in accordance with DRA's **IT standards**.

They must not be used for any improper purpose or in any way that might affect their operation or integrity.

We should assume that any information stored or communicated on our computer systems is the property of DRA. We should be aware that, subject to local law, DRA reserves the right to monitor our emails and internet usage, whether work-related or personal.

Personal use is a privilege, not a right, and must not be abused.

Email Communications

All information contained in emails or other electronic communication systems belongs to DRA.

All electronic communications which are carried out on DRA's communication and other electronic systems are subject to monitoring, with or without notice and regardless of whether our systems are accessed in or out of the workplace

or through our servers. DRA performs surveillance of all electronic communications and usage by our people.

DRA's computer systems – this includes information and communication technology, systems and equipment that are owned or used by DRA. They include:

- // Desktop, laptop and handheld computers/devices, such as smartphones or tablets;
- // Servers and networks (including connections to public or external networks such as the internet);
- // Storage devices such as memory sticks, memory cards, removable hard drives and CDs; and
- // Information stored in and transmitted by these technologies, such as emails, voice mails, instant messages, electronic files, database entries and internet postings.

OUR COMMITMENTS

- // Provide our people with the computer hardware, software and systems with which to perform their duties; and
- // Protect our people by implementing cyber security systems which detect and prevent malicious content.

KEY POLICIES & MORE INFORMATION

- // IT standards; and
- // Our managers, IT or human resources representatives.

WE ALWAYS

- ✓ Keep secure DRA's computer systems and information against loss, damage or theft;
- ✓ Follow all security and acceptable use standards for DRA's computer systems when using them for work or personal use or when accessing or storing DRA information on personal devices; and
- ✓ Get authorisation before installing software or connecting hardware (smartphone apps excluded).

WE NEVER

- x Share our passwords;
- x Download unlicensed software on any computer;
- x Use DRA's computer systems to access, obtain, create or distribute any material that's inappropriate, illegal or offensive. This includes obscene, pornographic, sexist, racist, defamatory, gambling and abusive material or material that is in breach of copyright; nor
- x Have any privacy expectations when using DRA's computer systems for work or personal use, unless otherwise stated by local law.

COMMUNICATIONS WITH SHAREHOLDERS AND INVESTORS

OUR PRINCIPLE

DRA is committed to providing shareholders and investors with clear and balanced information about our business and performance.

All price sensitive information must be first made available to shareholders and on any securities exchange announcements platform.

Price Sensitive Information – means any information concerning a DRA entity or operation that a reasonable person would expect to have a material effect on the price or values of DRA's securities.

WHAT DO WE MEAN?

We recognise the rights of shareholders to be informed of matters, in addition to those prescribed by law, which affects their investment in DRA.

Our aim is to communicate concisely, accurately, and openly. To facilitate two-way communication with shareholders, and the wider investment community, to provide a greater understanding of our business, performance, governance and financial prospects.

The Chairperson of the Board, the Managing Director (or their delegates) are the only authorised persons who may communicate with shareholders.

All employees are prohibited from communicating with shareholders and other investors.

Employees must notify the Company Secretary and Marketing & Communications department as soon as they become aware of information that may be **'price sensitive information'** that has not been previously notified to shareholders, or if they believe any prior disclosure is inaccurate or incomplete.

Employees will not comment or respond to reports or rumours published by analysts, fund managers or media reporters.

OUR COMMITMENTS

- // Meet our continuous disclosure requirements and keep our investors informed of matters which affect their investment in DRA; and
- // Communicate concisely, accurately and openly and facilitate two-way communication with shareholders and the wider investment community.

KEY POLICIES & MORE INFORMATION

- // Market Disclosure and Communications Policy and Standard; and
- // The Company Secretary or DRA's Marketing and Communications department.

WE ALWAYS

- ✓ Report immediately to our managers or the Company Secretary any information that may be market sensitive information that has not been previously notified to shareholders, or if we believe any prior disclosure is inaccurate or incomplete;
- ✓ Refer shareholder and investor calls to DRA's Marketing and Communications department;
- ✓ Take care about what we say at meetings or public events; and
- ✓ Watch out for situations in which we may be considered to be speaking on behalf of DRA.

WE NEVER

- x Release or communicate any Price Sensitive Information that has not already been released to shareholders or any securities exchange;
- x Speak or communicate to third parties on behalf of DRA (e.g. media, analysts, investors, shareholders), if we are not authorised to do so;
- x Respond to the media, regulators, government agencies or other external enquiries, if we are not authorised to do so; nor
- x Say or write things that may embarrass DRA or its shareholders or other stakeholders in any way, or damage DRA's relationship with them.



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