



# 2023

## MODERN SLAVERY STATEMENT



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## FEEDBACK

We welcome questions and feedback regarding this Statement. Please visit [www.draglobal.com/contact](http://www.draglobal.com/contact) to provide feedback.

## ACKNOWLEDGEMENT OF COUNTRY

DRA acknowledges and pays respect to all Traditional Owners and First Nation People that accommodate our operations around the world.

“ OUR VALUES UNDERPIN OUR DECISIONS, WHICH INCLUDES BEING SOCIALLY RESPONSIBLE IN EVERYTHING WE DO. WE STRIVE TO PROTECT THE HUMAN RIGHTS OF OUR PEOPLE, THOSE WHO LIVE IN THE AREAS WHERE WE OPERATE, THOSE WHO ARE PART OF OUR SUPPLY CHAINS AND ALL WHO ENGAGE WITH OUR BUSINESS. ”

*James Smith, Chief Executive Officer*



## ABOUT THIS STATEMENT

This Modern Slavery Statement ('Statement') has been prepared to meet the requirements of both the *Australian Modern Slavery Act 2018 (Cth)* ('Modern Slavery Act') and the *United Kingdom Modern Slavery Act 2015 (UK)* for the reporting period 1 January 2023 to 31 December 2023 ('FY23').

All references to our, we, us, the Group and DRA refer to the activities of DRA Global Limited (ABN 75 622 581 935) and all its subsidiaries. Our reporting entities covered by this joint Statement are set out in Appendix 1. Material subsidiaries of DRA that are covered by this report are listed in Appendix 2.

This Statement reports on the risks of modern slavery in DRA's operations and supply chains, as well as the actions DRA has taken to address those risks.

Mandatory reporting criteria as required under the Modern Slavery Act is provided in Appendix 3.

All dollar values in this Statement refer to AUD.

## WHAT IS MODERN SLAVERY?

Modern slavery is one of the most complex human rights challenges worldwide. Globally, it is estimated that around 50 million people are victims of modern slavery, an increase of 10 million people since 2016, including in countries where DRA operates. Modern slavery takes many forms and names, but it essentially describes situations where coercion, threats or deception are used to exploit people and undermine or deprive them of their freedom.

The Modern Slavery Act defines modern slavery as eight types of serious exploitation: trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services, and the worst forms of child labour.

# CONSULTATION

The Board of Directors for the reporting entities covered by this statement, the Executive Committee and senior management teams across the Group were consulted during the preparation and review of this Statement.

Internal stakeholders and subject matter experts were also engaged to provide input on the management of modern slavery risk and to ensure accuracy and relevance. Key areas of consultation and collaboration included our risk, compliance, legal, procurement and finance functions.

# COMMITMENT

DRA is committed to respecting human rights and does not tolerate any form of modern slavery in our operations or supply chain. We also expect our sub-contractors and suppliers to uphold the same standards of respect for human rights.

We are dedicated to finding and addressing any risks of modern slavery practices in our internal and supply chain operations through rigorous due diligence, remediation measures, training, contract management and good governance.

This Statement was approved in June 2024 by the Board of Directors in relation to DRA Global Limited and its subsidiaries.

Sebastiano (Sam) Randazzo, Board Chairman



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James Smith, CEO and Managing Director



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<sup>1</sup> Global Slavery Index Report 2023, Walk Free Foundation: <https://www.walkfree.org/global-slavery-index/>

# WE ARE DRA GLOBAL

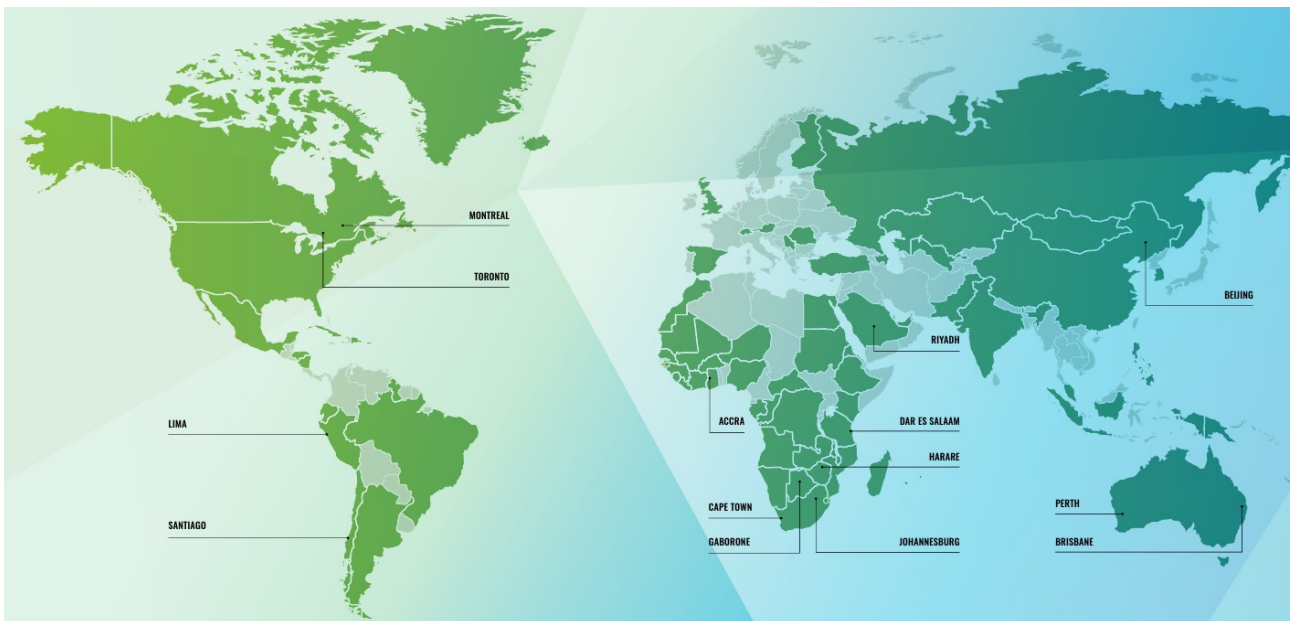
## STRUCTURE

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

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

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

Our workforce comprises approximately **4,200** employees throughout **14** offices across **11** countries. Key trading names across the Group include DRA, SENET and Minopex.



# OUR VALUES

We are driven by our purpose to create value by fulfilling the aspirations of our people, clients, shareholders, and the communities that we work in. Our values direct our behaviour – defining how we work together and the decisions we make every day.



# OUR WORK

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

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

Our core business focuses on delivering services to a diverse client base, from junior miners to global Tier-1, multi-commodity clients exclusively in the mining, minerals and metals industry.



## DRA PROJECTS

Projects provide mine-to-port project delivery services across our regions specifically for the engineering design, project management and construction management of mine assets.

Our team of talented professionals draw on comprehensive knowledge and extensive experience to deliver fit-for-purpose engineering solutions. From scoping and pre-feasibility to final handover our people add value across the entire lifecycle of a project. Our design capabilities and excellent project management skills ensure the successful implementation of projects across multiple countries, commodities and sectors.

## OPERATIONS

As companies look for innovative ways to reduce operating and maintenance costs and improve productivity, DRA Operations offer a unique business model for mineral processing throughout the world. DRA Operations is a leader in this sector, adding value to mining operations by meeting the unique needs of our clients.

From coal, chromite, and ferrous metals, to diamonds, gold, and platinum group metals, we offer a wide range of services designed to make mineral processing requirements more cost-effective while maintaining product quality, plant integrity and worker safety.

## OUR SERVICES

Our business model covers the full project lifecycle, offering optimal solutions that are tailored to meet clients' needs and solutions for the mining, minerals and metals industry.



# SUPPLIER CHAIN

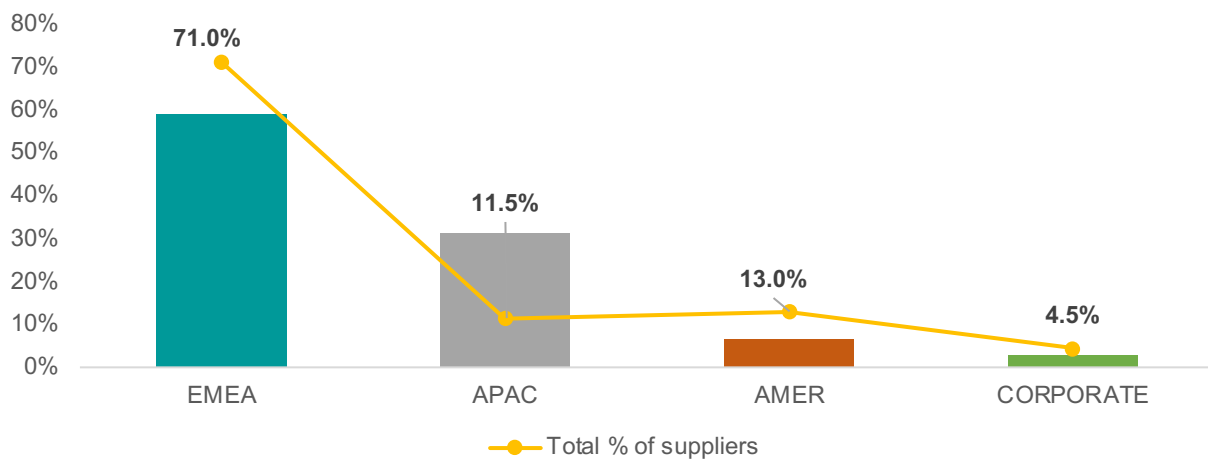
We seek to create positive outcomes in our supply chain by giving preference to local procurement wherever possible and always respecting human rights.

## SUPPLIER SPEND

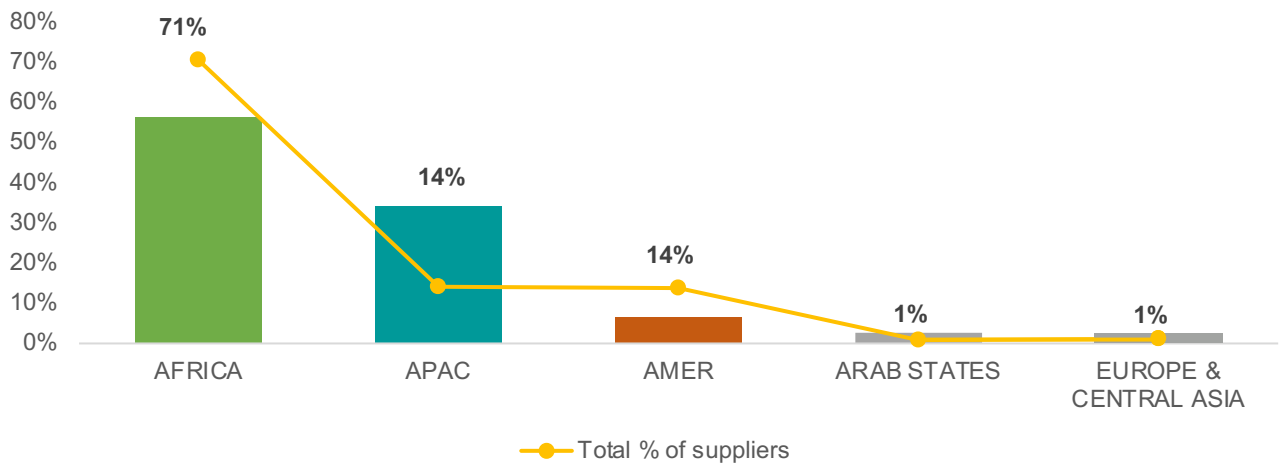
We procure goods and services across a wide range of categories, from small local businesses through to global suppliers and service providers. During FY23, we procured \$289.1M in goods and services to support our engineering, project, operations and corporate office activities. These goods and services were procured from 4,020 suppliers from 41 countries.

Our spend per operating segment and regional spend is presented in Figure 1 and Figure 2.

**Figure 1:** Supplier spend by DRA operating segment (as a % of total supplier spend)



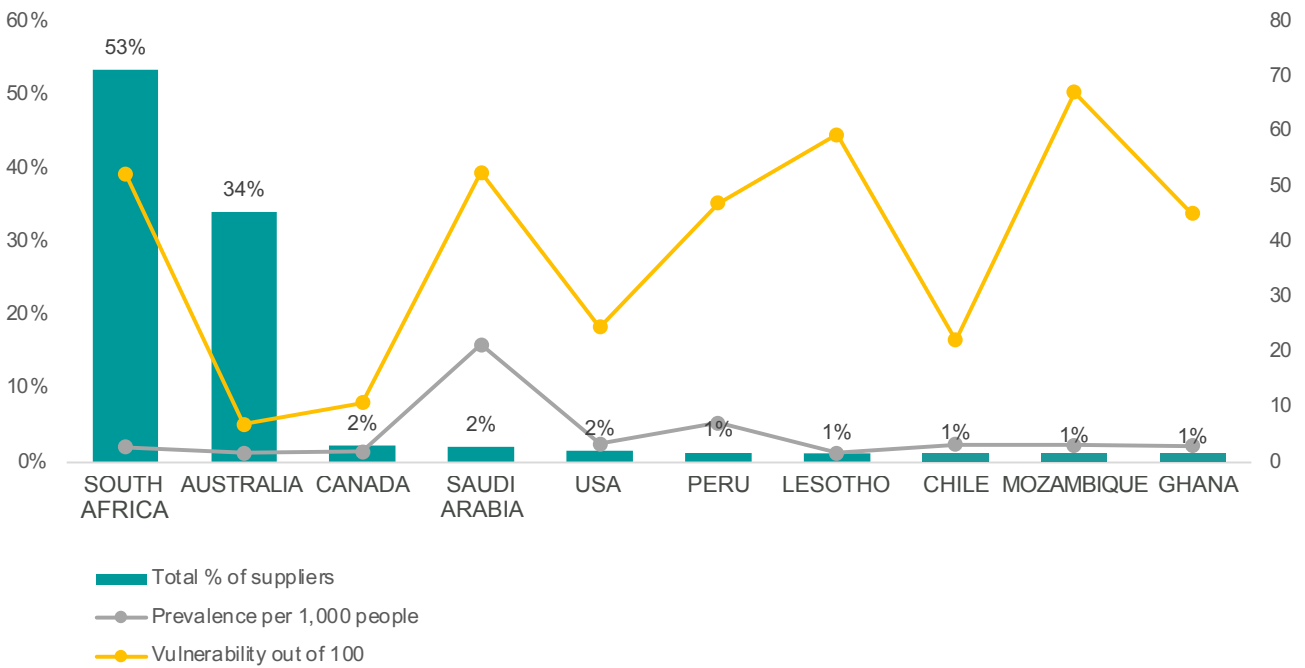
**Figure 2:** Supplier spend by global region (as a % of total supplier spend)





Our top 10 sourcing countries by supplier spend during FY23, comprising 98 per cent (noting South Africa and Australian suppliers make up 87 per cent) as well as their corresponding prevalence and vulnerability to modern slavery as per the Global Slavery Index 2023, is presented in Figure 3.

**Figure 3: Top 10 sourcing countries by supplier spend**



## SUPPORTING LOCAL SUPPLIERS

Local procurement can deliver significant benefit to host communities, and we endeavour to provide business opportunities that will assist our communities to become self-sustaining. Wherever possible, we provide local businesses access to procurement and contracting opportunities, and support capacity building projects.

# ASSESSMENT OF MODERN SLAVERY RISKS

DRA recognises that risk is inherent in our business and the effective management of risk is critical to the delivery of our strategy and the achievement of our objectives.

To effectively manage risk, we have an established risk management process aligned to the International Standard for Risk Management AS/NZS ISO 31000:2018. This involves regular monitoring of internal and external factors that have the potential to affect our business. Our risks are regularly reviewed, assessed, and managed at both a global strategic level, as well as operational, project and functional levels.

## RISKS WITHIN OUR WORKFORCE

<b>CAUSE</b>	DRA may cause modern slavery as a direct result of its activities and/or actions.	<ul style="list-style-type: none"> <li>// We have a low risk of causing modern slavery with our services and operations.</li> <li>// We acknowledge that modern slavery exists in some of our countries of operation and ensure our risk controls are operating effectively.</li> </ul>
<b>CONTRIBUTE</b>	DRA may contribute to modern slavery through activities or inactions of facilitation or incentivisation.	<p>There is a risk that we may contribute indirectly to modern slavery due to:</p> <ul style="list-style-type: none"> <li>// the conditions we impose on our suppliers through contractual obligations, timeframes and price; or</li> <li>// unknowingly enabling the engagement of exploited people in a local community such as for domestic work.</li> </ul>
<b>DIRECTLY LINKED</b>	DRA activities may be connected to modern slavery through another entity that we have a direct relationship. This includes where modern slavery may occur in our supply chain.	<ul style="list-style-type: none"> <li>// There is an increased risk due to the locations of our operations that we may be directly linked to modern slavery.</li> <li>// This may be because of the use of an approved contractor, who subsequently and without our knowledge, engages sub-contractors that uses forced labour.</li> </ul>

## PRINCIPAL RISKS OF MODERN SLAVERY

We acknowledge that the mining industry as well as countries where we operate has the potential to impact human rights. A risk assessment has identified the following potential human rights risks for DRA.

<b>WORKFORCE</b>	<p>Modern slavery risks are exacerbated in business models that rely on complex contracting and sub-contracting arrangements, and where third-parties are extensively used. While most of DRA's workforce is directly employed, labour hire in some locations is occasionally used to source specific skills or local employees.</p> <p>The majority of our employees are employed directly under permanent, fixed-term, part-time or casual contracts, or under enterprise or collective bargaining agreements. This significantly aids the reduction of risk of modern slavery. All DRA employment contracts meet the applicable employment legislation in the countries where we operate.</p>
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## SUPPLY CHAIN

DRA procures a range of goods and services from over 4,000 active suppliers. Spend categories and services procured consist of:

- // construction contractors;
- // goods and equipment;
- // labour hire/recruitment;
- // logistics;
- // operations and maintenance;
- // professional services; and
- // other.

Our procurement procedures incorporate detailed supplier selection processes and are aligned to our values and ethical standards.

We set clear expectations with our suppliers to manage the risk of modern slavery and comply with any applicable modern slavery laws in their supply chain. This is communicated in our Supplier Code of Conduct and specified in our contractual terms and conditions. This clause is mandatory in all our contracts.

We undertake due diligence of our suppliers to assess any potential compliance or reputational risks, including the risk of modern slavery, and conduct further due diligence where risks are identified. We have also performed an additional detailed due diligence screening of all our FY23 suppliers across the Group for multiple risk factors, including the risk of modern slavery through an external third-party risk management screening consultant. The outcomes of this revealed that 96 suppliers will be further investigated.

DRA acknowledges the potential risks beyond our direct suppliers for modern slavery risks to reside within indirect supply chains. Our ability to detect and influence becomes more challenging at this level, as we have no contractual relationship with these suppliers and a limited ability to require them to comply with our minimum standards. We do however continue to monitor this risk through our ongoing due diligence and risk management processes.

## GEOGRAPHIC LOCATION

Modern slavery risks can be linked to certain countries and geographic regions. Some countries or regions may have high modern slavery risks due to political, socio-economic and legal factors.

We undertake comprehensive risk assessments prior to entering any foreign markets, which includes a detailed country risk assessment and assessment of modern slavery risks. We use LSEG (Refinitiv) to aid us in assessing modern slavery prevalence and vulnerability within a particular country. This process supports the identification of critical risk factors, such as human rights, human trafficking and exploitative labour.

The Global Slavery Index Report 2023 measures the extent of modern slavery by country and provides analysis of trade flows and data on specific products with an increased risk of modern slavery. This data is used by DRA to aid in the assessment of modern slavery risk in our operations and supply chain.

## BUSINESS RELATIONSHIPS

DRA is typically engaged by mining companies to provide services and is therefore at risk of being affected by the actions of our clients. Specific consideration is given to 'know your customer' (KYC), and ensuring measures are in place to identify these potential modern slavery risks and explore ways to collaborate with our clients to manage them.

# HUMAN RIGHTS GOVERNANCE

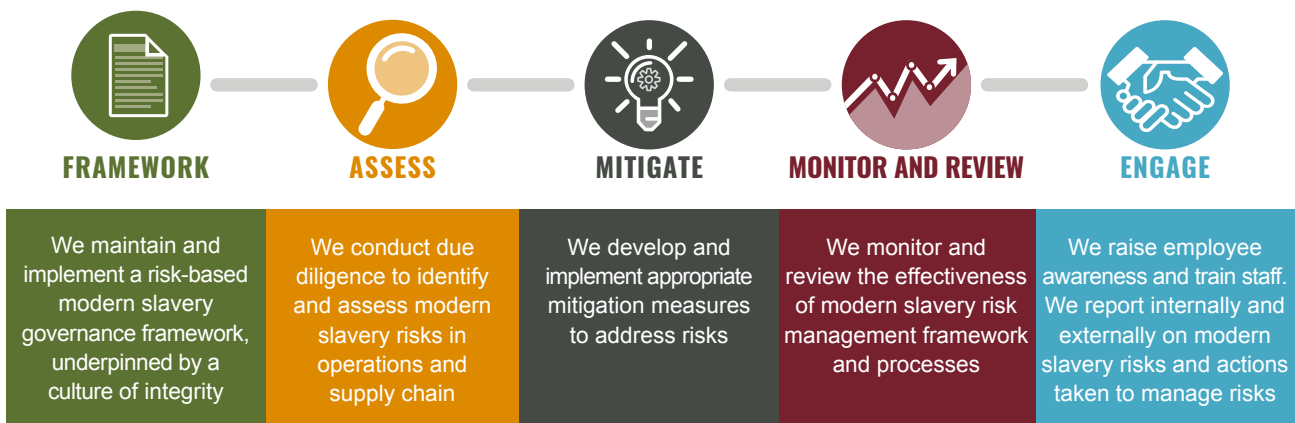
“ THE BOARD AND MANAGEMENT ARE COMMITTED TO MAINTAINING AND ENHANCING CORPORATE GOVERNANCE SO THAT IT CONTINUES TO CONTRIBUTE TO THE ACHIEVEMENT OF DRA’S VISION, STRATEGY AND CULTURE. ”

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

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

DRA’s CEO and Executive Committee are accountable to the Board for the effective implementation of the Group’s governance processes and practices. Our Code of Conduct, Sustainability Policy, Human Rights and Modern Slavery Standard form the foundation of managing human rights. Our approach to addressing modern slavery risks is presented in **Figure 4**.

**Figure 4: DRA’s modern slavery governance approach**



The governance of potential risks of modern slavery in our operations and supply chain is underpinned by a suite of policies, frameworks and standards that outline our commitment and expectations towards human rights. All policies and standards are made available to employees and contractors on our company intranet and communicated via internal communications channels and training programs.

## OUR POLICIES AND STANDARDS

Our policy framework supports our people, the delivery of our strategy and provides a role in effective and responsible decision making and business conduct. Integral to the framework is our Code of Conduct which guides our behaviours and reinforces the importance of conducting our work respectfully and responsibly.

### CODE OF CONDUCT

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

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

### SUPPLIER CODE OF CONDUCT

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

### HUMAN RIGHTS AND MODERN SLAVERY STANDARD

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

Our Standard addresses reporting, redress and investigation of human rights and modern slavery violations. It involves a diverse group of senior management, independent control functions, and escalation protocols for internal and external reporting.

### SANCTIONS COMPLIANCE AND BUSINESS PARTNER DUE DILIGENCE STANDARD

Our Sanctions Compliance and Business Partner Due Diligence Standard provides a structured and consistent approach for the identification, assessment, evaluation and treatment of compliance and reputational risks, including the risk of modern slavery, prior to engaging or entering contractual arrangements with any business partner. and key staff involved in the engagement of third parties.

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

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

### RESPECTFUL WORKPLACE POLICY AND STANDARD

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

## INCLUSION AND DIVERSITY POLICY AND STANDARD

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

## GRIEVANCE HANDLING AND DISPUTE RESOLUTION STANDARD

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

## RISK MANAGEMENT POLICY AND FRAMEWORK

We proactively and systematically identify, analyse and treat exposures that could potentially impact our business. Risks are reported to management ensuring that appropriate action is being implemented. The Board via the Audit and Risk Committee oversee the effectiveness of DRA's risk management. All employees are responsible for managing risk in accordance with the Policy and Framework.

We assess potential human right risks and impacts as part of our risk management and due diligence processes.

## SPEAK-UP POLICY AND STANDARD

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

Further information about corporate governance at DRA, as well as copies of our Board and Committee Charters, Code of Conduct and various policies can be found at [www.draglobal.com](http://www.draglobal.com)

# EVALUATING EFFECTIVENESS

DRA is committed to the continuous improvement of its modern slavery risk management processes. We regularly evaluate and assess the impact of our actions and look for ways to better detect and address the potential of modern slavery in our operations and supply chain across the Group.

We evaluate and report to the Board and the Audit and Risk Committee on a regular basis, with relevant data, on the steps we take to prevent the risk of modern slavery in our activities or supply chain. This supports the assessment of the effectiveness of the measures we have undertaken, including governance measures, due diligence activity, any reports of modern slavery risks and employee training.

During FY23, there have been no known incidents, reports or significant risks of modern slavery identified within our operations or supply chain.

## PROGRESS ON OUR COMMITMENT TO HUMAN RIGHTS

During this reporting period, DRA has updated its operating model. The focus has been on enhancing existing processes and embedding our due diligence processes. A review of our policy and standards framework will be undertaken in FY24/25 to align the revised business operating model.

### COMMITMENT

### STATUS

### PROGRESS

Review our Human Rights and Modern Slavery Standard to ensure it continues to effectively govern the identification and management of modern slavery risks and ensure compliance with applicable laws.



Due to recent changes in our operating model and resourcing, the review of our Human Rights and Modern Slavery Standard will be revisited in FY24/25.

Continue to strengthen the implementation of our processes and procedures that support the identification and treatment of modern slavery risks, with a focus on countries and jurisdictions that have a higher risk of modern slavery.



Our revised Sanctions Compliance and Business Partner Due Diligence Standard has been implemented. We continue to be vigilant with our due diligence processes to support the identification of modern slavery risk.

Develop a Group Procurement Standard that includes expectations of due diligence in accordance with DRA's Sanctions Compliance and Business Partner Due Diligence Standard and alignment to DRA's Supplier Code of Conduct to strengthen the due diligence process in our procurement practices.



A draft Group Procurement Standard is in progress, finalisation is targeted for FY24.

Continue to deliver employee training on our Code of Conduct and Human Rights and Modern Slavery Standard.



Our revised operating model require that all business units develop and deliver a schedule of training. Code of Conduct and Human Rights and Modern Slavery Standard training is to be incorporated.

Training schedules are to be updated in FY24.

Strengthen our measurement of the effectiveness of the modern slavery framework by adopting and reporting against formal key performance indicators.



With the implementation of the revised operating model, our key performance indicators will be reviewed in FY24/25. These will be set by each of the business units in the region and annually reported.

# APPENDIX 1: REPORTING ENTITIES

The following entities within the DRA Group meet the threshold requirements of a reporting entity pursuant to the Modern Slavery Act and are covered by this joint Modern Slavery Statement. Both entities are incorporated in Australia with its registered office at 256 Adelaide Terrace, Perth, Western Australia.

Consultation has been undertaken with the following entities, Directors and senior management, including a review of this report.

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



# APPENDIX 2: MATERIAL SUBSIDIARIES

Material subsidiaries of DRA Global Limited, which are those with the most significant contribution to the Group's revenue or profit/(loss) before tax during FY23 are as follows:

NAME	COUNTRY OF INCORPORATION	% INTEREST
DRA Americas Inc. (Canada)	Canada	100%
DRA Americas Perú S.A.C	Peru	100%
DRA Pacific Pty Ltd	Australia	100%
DRA Operations (APAC) Pty Ltd	Australia	100%
DRA Projects Pty Ltd	South Africa	100%
DRA Projects SA Pty Ltd	South Africa	100%
DRA South Africa Projects Pty Ltd	South Africa	100%
DRA Projects Liberia Inc.	Liberia	100%
DRA Saudi Arabia LLC	Saudi Arabia	100%
Minerals Operations Executive Pty Ltd	South Africa	100%
Minopex Lesotho Pty Ltd	Lesotho	100%
New SENET Pty Ltd	South Africa	100%
UMM Contracting Services Pty Ltd	South Africa	60%

# APPENDIX 3: DISCLOSURE INDEX OF MANDATORY STATEMENT CRITERIA

The table below indicates the location of the disclosure within this statement of the mandatory reporting criteria, as set out in section 16 of the Modern Slavery Act.

MANDATORY REPORTING CRITERIA	LOCATION
a) Identify the reporting entity.	Page 3 Appendix 1
b) Describe the Reporting Entity's structure, operations and supply chains.	Page 5 – 9 Appendix 1 and 2
c) Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Page 10 - 11
d) Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes.	Page 12 - 14
e) Describe how the reporting entity assesses the effectiveness of these actions.	Page 15
f) Describe the process of consultation on the development of the statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entity covered by the statement).	Page 4 Appendix 1
g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	-



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