



# MODERN SLAVERY STATEMENT 2021









---

## CONTENTS

<b>1. About this statement.....</b>	<b>2</b>
<b>2. Our commitment.....</b>	<b>3</b>
<b>3. Structure, operations and supply chain.....</b>	<b>4</b>
3.1. Structure and operations.....	4
3.2. Supply chain.....	6
<b>4. Controls and governance mitigating modern slavery risks.....</b>	<b>8</b>
<b>5. Risks of modern slavery .....</b>	<b>9</b>
<b>6. Actions taken to mitigate risks of modern slavery .....</b>	<b>10</b>
6.1. Stakeholder engagement and collaboration.....	10
6.2. Policies, standards and governance .....	10
Code of Conduct .....	10
Supplier Code of Conduct.....	10
Speak-up Policy and Standard.....	11
Human Rights and Modern Slavery Standard.....	11
6.3. Training and awareness .....	11
6.4. Reporting of human rights and modern slavery concerns.....	12
6.5. Supplier contractual terms and conditions .....	12
6.6. Supplier screening and due diligence .....	12
6.7. Supplier engagement.....	12
<b>7. Measuring effectiveness.....</b>	<b>13</b>
<b>8. Continuous improvement.....</b>	<b>14</b>
<b>Annexure: Disclosure index of mandatory statement criteria .....</b>	<b>15</b>
<b>Contact us .....</b>	<b>16</b>



## 1. ABOUT THIS STATEMENT

DRA Global Limited (ACN 622 581 935) (“DRA”) is an Australian company, with its registered address at 256 Adelaide Terrace, Perth, Western Australia, 6000, 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.

This joint modern slavery statement marks the second statement made by DRA pursuant to the Australian *Modern Slavery Act 2018 (Cth)* (the “Act”) for the financial year ended 31 December 2021 (the “reporting period” or “FY2021”). The statement covers the activities of DRA and all its subsidiaries (collectively referred to as the “DRA Group”) during the reporting period and sets out the DRA Group’s risks of modern slavery in our operations and supply chains, and the actions taken to assess and manage these risks.

The location of the disclosure of the mandatory reporting criteria within this statement, as required under the Act, is provided in the Annexure to this statement.

This statement, as well as the submission thereof to the Australian Government Department of Home Affairs, was approved by DRA’s Board of Directors on 30 June 2022.



**Peter Mansell**

Board Chair

DRA Global Limited

## 2. OUR COMMITMENT

Modern slavery and its associated risks are a global issue and is estimated to affect around 40.3 million people globally<sup>1</sup>. Modern slavery is the serious exploitation of people for personal or commercial gain. It is a major violation of human rights and covers serious crimes including eight types of exploitation: human trafficking; slavery; servitude; forced marriage; forced labour; debt bondage; the worst forms of child labour; and deceptive recruiting for labour or services.

Respect for human rights is consistent with the DRA Group's values of People, Trust, Integrity and Courage and is fundamental to the sustainability of the DRA Group and the communities within which we operate. The DRA Group does not accept any form of modern slavery in its business operations or supply chain and is committed to ensuring all workers are treated fairly and with respect. The DRA Group has a global commitment to respecting human rights and takes a global approach to address any risks of modern slavery in our operations and supply chain. The DRA Group's frameworks, standards, policies, procedures and systems referred to in this statement apply across all subsidiaries comprising the DRA Group.

The DRA Group has operations in a number of countries and jurisdictions that have an inherent high risk of modern slavery. Developing a framework to assess and manage these risks across the DRA Group's global supply chain is a key objective, as further detailed in this statement.

### KEY ACTIVITIES FY2021

- // Developed and implemented a Sanctions, Restrictions and Due Diligence Compliance Framework that sets out the due diligence responsibilities of the DRA Group and our employees when dealing with third parties and the minimum expectations that such third parties working with the DRA Group must adhere to. Our modern slavery risk identification process will be supported by Supplier Questionnaire-based assessments, for rollout in the next reporting period.
- // Developed employee training material to support the implementation of the DRA Group's Code of Conduct, Supplier Code of Conduct and Human Rights and Modern Slavery Standard and ensure ongoing awareness on the required measures to address the risks of, amongst other things, modern slavery, for rollout during the next reporting period.
- // Procured a leading risk screening and due diligence tool to support our third-party due diligence processes, which includes screening for various categories of human rights violations. A further screening of the DRA Group's supply chain database was completed during the reporting period, with ongoing screening of new third parties on a risk-based approach. Further enhancements to our risk assessment, due diligence, supply chain assessment and compliance management processes are planned for the next reporting period.

<sup>1</sup> The Global Slavery Index 2018, Walk Free Foundation ([www.globalslaveryindex.org](http://www.globalslaveryindex.org))



### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.1. STRUCTURE AND OPERATIONS

Headquartered in Perth, Australia, with 19 offices globally, the DRA Group is a diversified multi-disciplinary engineering, design, construction delivery, project management, advisory and managed services group focused on the mining, metals and minerals sector.

The DRA Group was established in 1984 and has developed into a global business, employing over 4,500 people as at 31 December 2021, with operations extending across two broad regional segments (refer to **Figure 1**):

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

At DRA we believe in challenging the status quo, thinking differently, exploring possibilities, developing our talent and doing things better every day that shape the future of sustainable mining. DRA has delivered world-class projects and provided managed services for clients in some of the world's most challenging environments. Collaboration, innovation and ongoing improvement are embedded in everything we do.

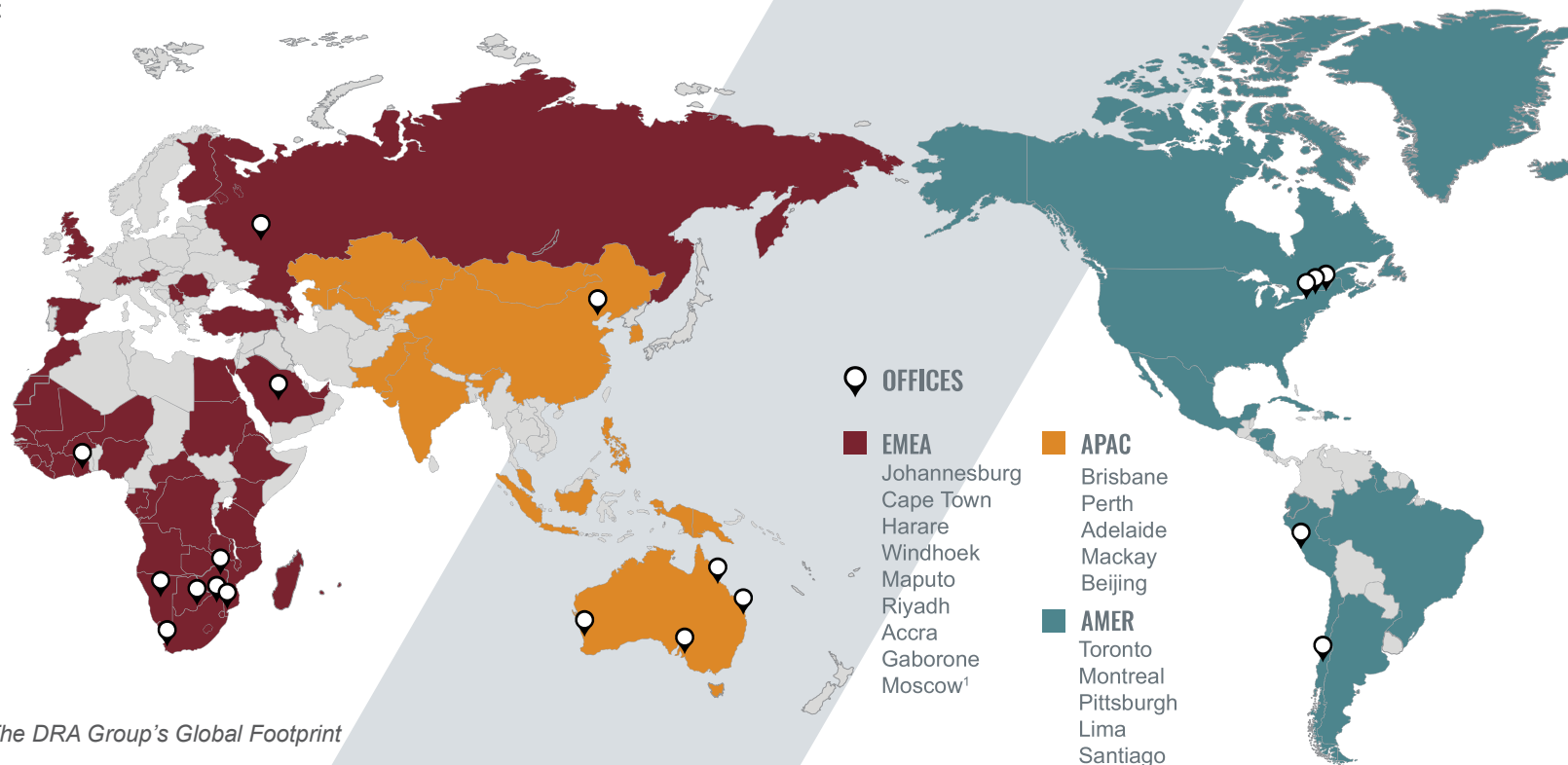


Figure 1: The DRA Group's Global Footprint

<sup>1</sup> Subsequent to the financial year ended 31 December 2021, DRA has ceased all operations in Russia.

### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.1 STRUCTURE AND OPERATIONS (CONTINUED)

The DRA Group has expertise in mining, mineral and metals processing, specifically in respect of project development, engineering, delivery and commissioning, as well as ongoing advisory, operations and maintenance services. The DRA Group also offers the design and implementation of associated non-process infrastructure as well as water and energy solutions for projects. Core activities are described in **Figure 2**.

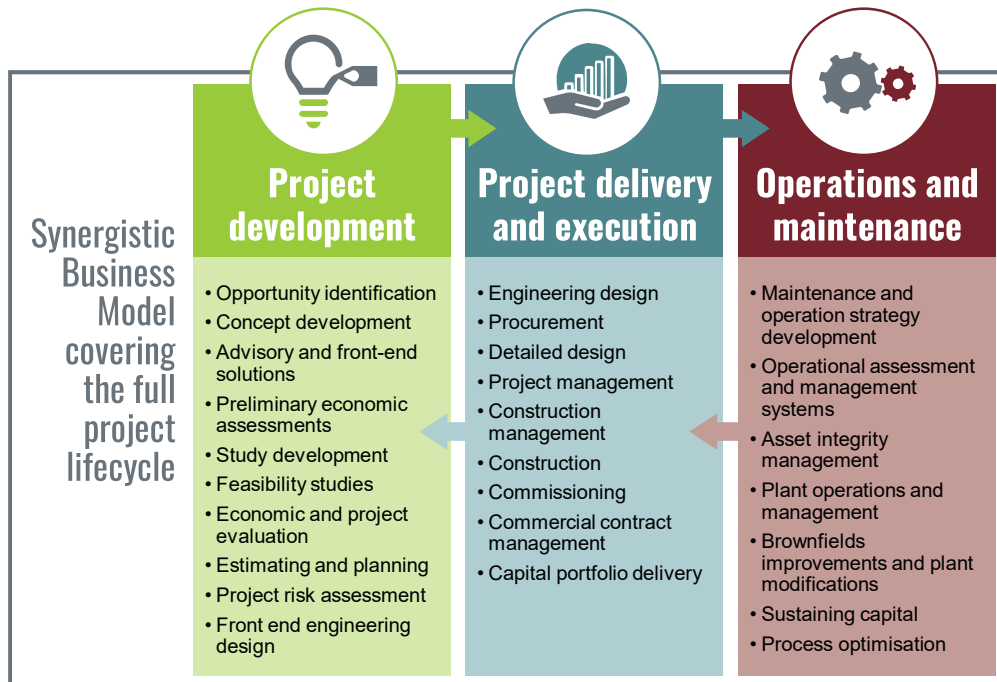


Figure 2: The DRA Group's services across the project lifecycle



### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.2. SUPPLY CHAIN

The DRA Group recognises that supply chain traceability is rising in importance, driven by new laws and the growing concerns of consumers and the communities within which we operate. Clients, investors and employees are increasingly conscious of the foreign supply chain footprint of their organisation. The DRA Group is committed to building capacity and capability in the community for supply chain resilience and lasting local economic self-sufficiency, in partnership with industry and governments.

The DRA Group is committed to supporting local suppliers that operate businesses in the regions in which we operate. Our procurement teams actively source from local suppliers and include them in sourcing activities where their technical skills, capability, quality control and assurance capabilities are assessed to meet the DRA Group’s requirements and standards.

The DRA Group sources a diverse range of services and goods. The respective percentages of category spend are depicted in **Figure 3**.

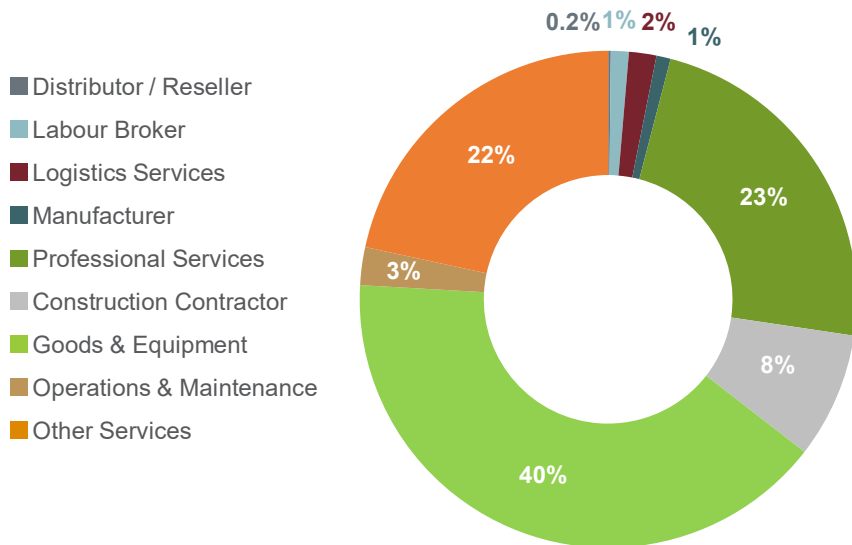


Figure 3: Spend Categories Percentages (%)





### 3. STRUCTURE, OPERATIONS AND SUPPLY CHAIN

#### 3.2 SUPPLY CHAIN (CONTINUED)

The DRA Group operates in diverse markets with a global supply chain. In FY2021, the DRA Group maintained a global supplier database of approximately 3,500 suppliers with a total expenditure equivalent to A\$408.5m, comprising total expenditure of A\$220m in the EMEA region; A\$174m in the APAC region; and A\$14m in the AMER region.

This resulted in A\$241m in payments being made to our suppliers globally and A\$167m in direct spend with our local suppliers supporting our Australian operations.

Total expenditure per region is detailed in **Figure 4**.

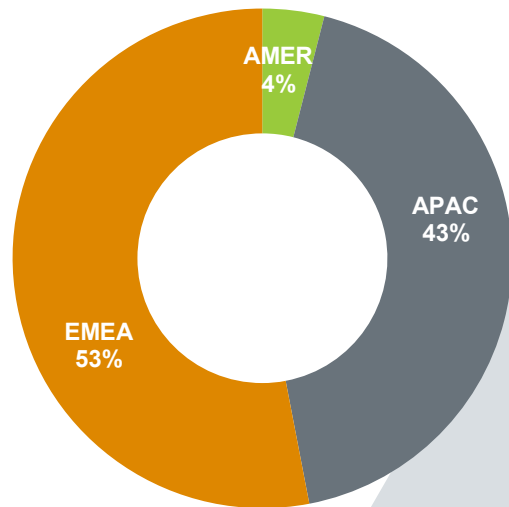


Figure 4: Regional Spend Percentages

During the reporting period, the following five countries constituted the highest supplier spend, comprising 92% of total supplier spend, as represented in **Figure 5**:

- // Republic of South Africa (RSA)
- // Australia
- // Democratic Republic of Congo (DRC)
- // Saudi Arabia
- // Canada

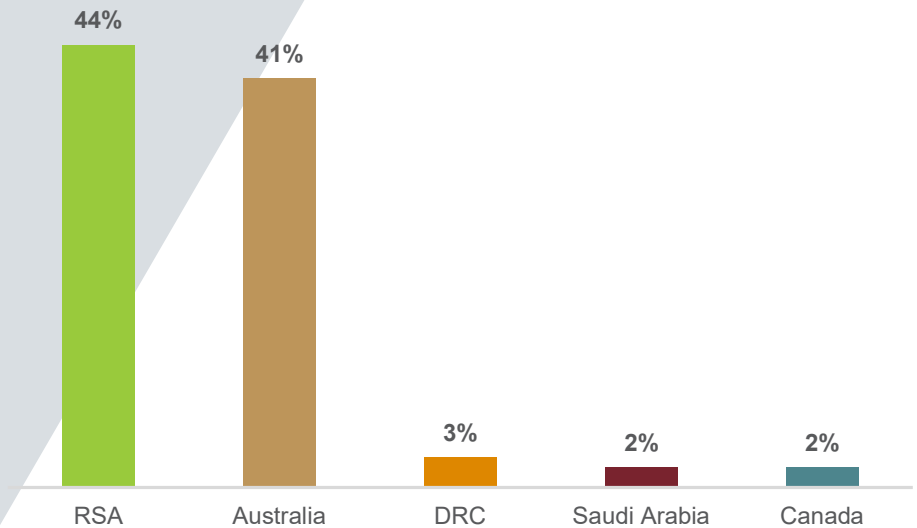


Figure 5: Highest Spend Countries

## 4. CONTROLS AND GOVERNANCE MITIGATING MODERN SLAVERY RISKS

Oversight of the risks of modern slavery sits with the DRA Board. Further oversight and guidance are provided by the Audit and Risk Committee which is responsible for overseeing the effectiveness of the system of internal controls.

The operational responsibility for execution of policies and programmes sits with the regional leadership who are responsible for upholding the DRA Group's standards and requirements within their own businesses including within the supply chain. The Group Compliance Officer continues to provide leadership and engagement across key compliance risks, including modern slavery. This includes development of policies and associated procedures, regulatory updates, making an active contribution to the training and development of employees through the sharing of best practice advice, and leveraging the use of e-learning platforms.

As part of our initiative to identify and mitigate risk, we have systems and processes in place to:

- // identify and assess potential risk areas in our supply chains;
- // mitigate the risk of slavery and human trafficking occurring in our supply chains;
- // monitor potential risk areas in our supply chains; and
- // protect whistle-blowers.

The DRA Group's internal controls (including the frameworks, standards, policies and procedures) reinforce these systems and are designed to manage risk and to ensure compliance with relevant legislation and regulation, including that related to social, environmental and ethical issues.

The majority of the DRA Group's employees are employed directly and under permanent, fixed-term, part-time or casual contracts, or under enterprise or collective bargaining agreements, which significantly lowers the risk of modern slavery. All DRA Group employment contracts meet the applicable employment legislation in the countries in which the DRA Group operates.





## 5. RISKS OF MODERN SLAVERY

The DRA Group recognises project-related activities can pose a significant risk of modern slavery due to the high rates of employment of subcontractors and employment of lower-skilled workers. Within some parts of its operations, the DRA Group may utilise labour through third-party providers and subcontractors. The DRA Group has varied levels of oversight and supervision over the employment and the terms and conditions of employment labour utilised by third-party providers and subcontractors.

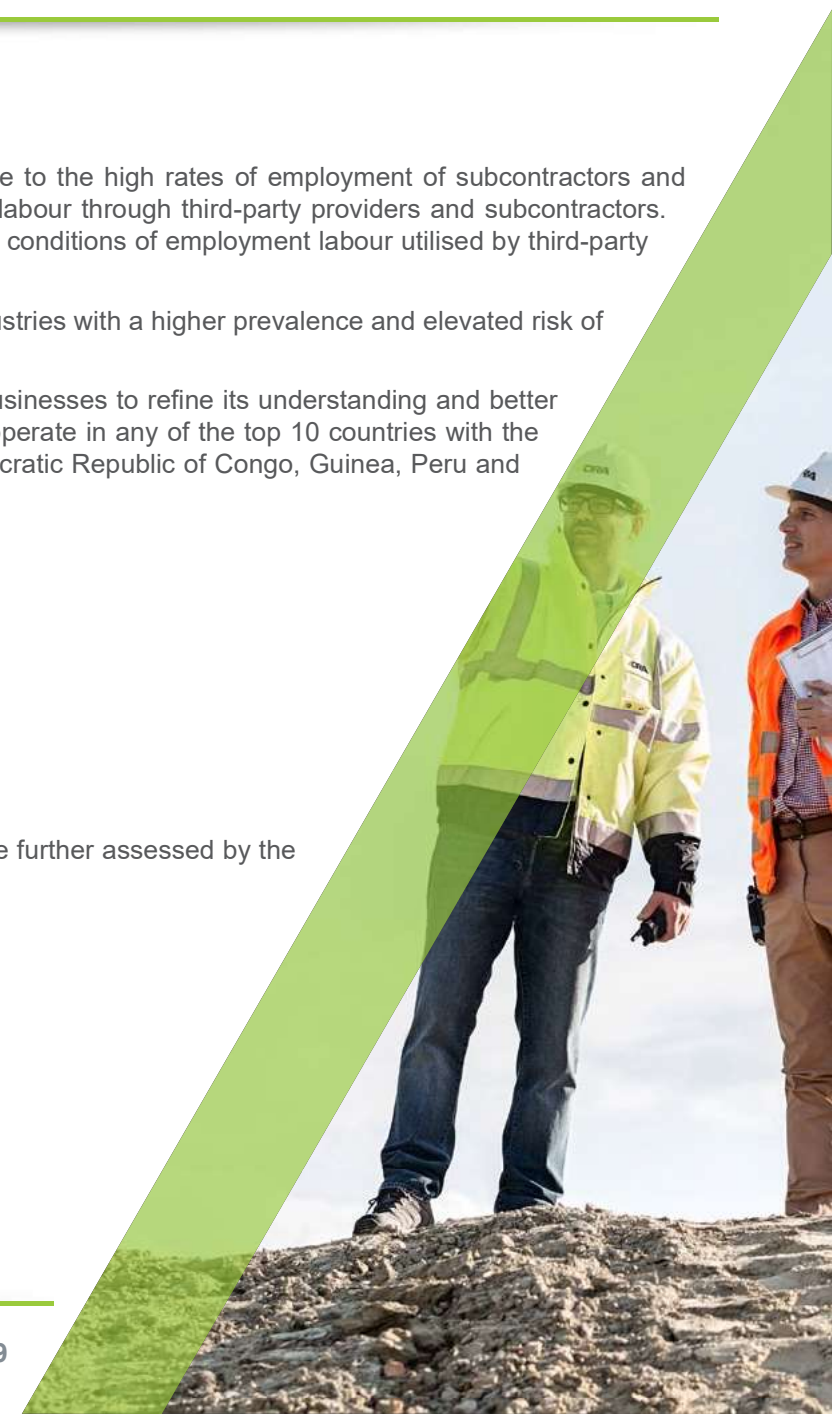
The risk of modern slavery occurring is greater for labour suppliers that operate in geographies and industries with a higher prevalence and elevated risk of modern slavery.

The [Global Slavery Index 2018](#) measures the extent of modern slavery by country. It enables global businesses to refine its understanding and better identify and respond to modern slavery risks. In accordance with the Index, the DRA Group does not operate in any of the top 10 countries with the highest prevalence of modern slavery. However, the DRA Group does utilise suppliers located in Democratic Republic of Congo, Guinea, Peru and Saudi Arabia, which are countries recognised by the Index as having a higher risk of modern slavery.

We have implemented the following methods to identify and manage our modern slavery risks:

- // Code of Conduct
- // Supplier Code of Conduct
- // Speak Up Policy and Standard
- // Human Rights and Modern Slavery Standard
- // Sanctions, Restrictions and Due Diligence Compliance Framework
- // Risk Management Policy and Framework

Suppliers and their supply chains in countries identified as having a higher risk of modern slavery will be further assessed by the DRA Group in the next reporting period.



## 6. ACTIONS TAKEN TO MITIGATE RISKS OF MODERN SLAVERY

### 6.1. STAKEHOLDER ENGAGEMENT AND COLLABORATION

The DRA Group has uplifted its frameworks, standards, policies and governance in relation to modern slavery in consultation with internal stakeholders. During its development and ongoing implementation, consultation was undertaken with both corporate and operational stakeholders across the DRA Group. Reviews of identified risks were conducted by business and key departmental leads.

### 6.2. POLICIES, STANDARDS AND GOVERNANCE

The DRA Board is responsible for overseeing the DRA Group's governance, compliance and risk management practices, which includes the governance of our potential risks of modern slavery. Underpinning the structure are a suite of frameworks, policies and standards outlining the DRA Group's commitment and expectations in relation to modern slavery.

The codes, frameworks, policies and standards described below underpin the DRA Group's approach to managing modern slavery. These are available to all staff through the intranet and, where applicable, also via the DRA Group's website at [www.draglobal.com](http://www.draglobal.com).

#### CODE OF CONDUCT

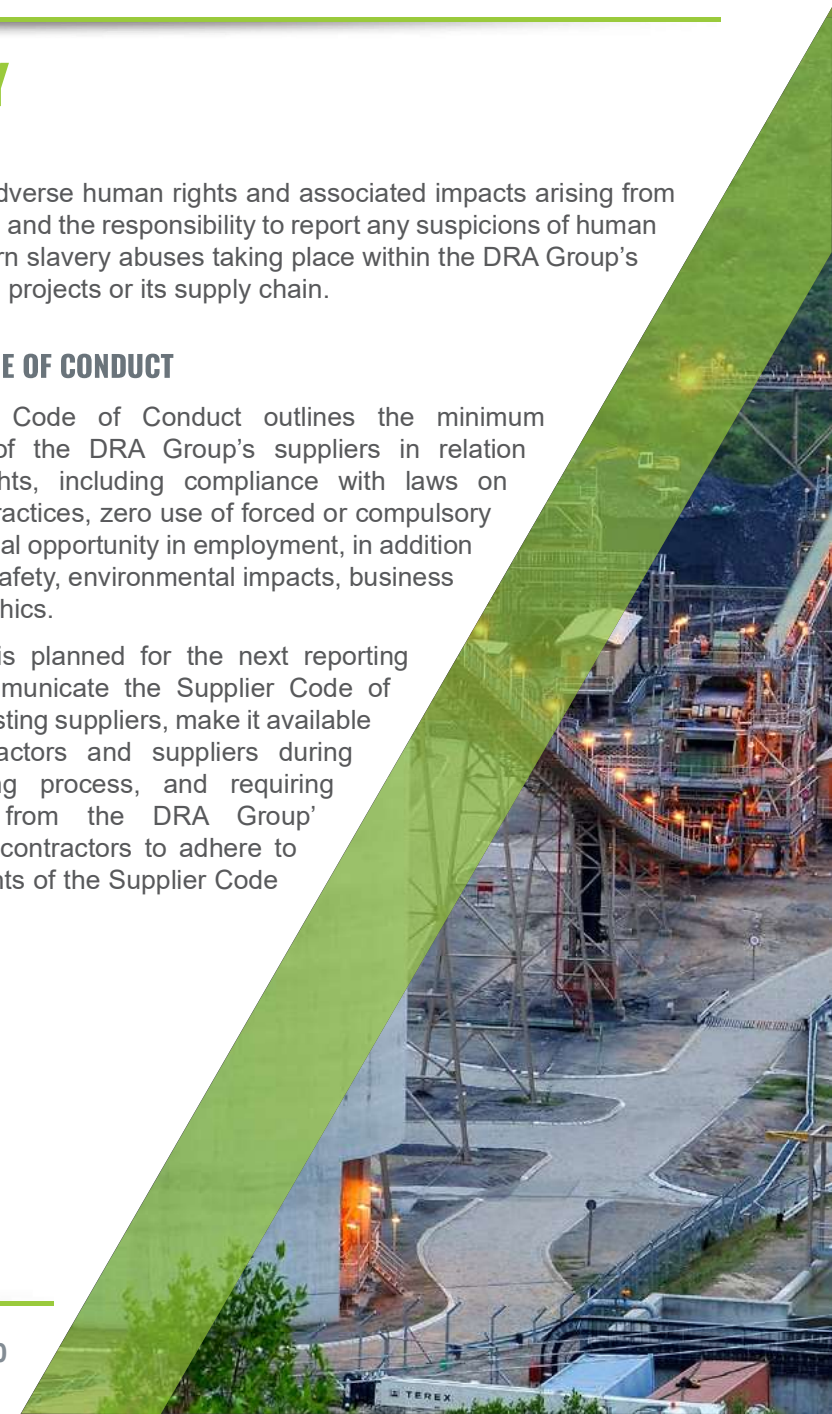
The Code of Conduct outlines the DRA Group's commitment to a high level of integrity and ethical standards in all business practices. Accordingly, the Board has adopted a Code of Conduct that outlines how the DRA Group expects its employees, management and directors to behave and conduct business in the workplace on a range of issues. The DRA Group's contractors, agents, suppliers, partners, service providers and consultants are also expected to adhere to the Code when dealing with or acting on behalf of the DRA Group. The Code of Conduct confirms the DRA Group's 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 the DRA Group's 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 DRA Group's operations and projects or its supply chain.

#### SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct outlines the minimum expectations of the DRA Group's suppliers in relation to human rights, including compliance with laws on employment practices, zero use of forced or compulsory labour and equal opportunity in employment, in addition to health and safety, environmental impacts, business integrity and ethics.

Further work is planned for the next reporting period to communicate the Supplier Code of Conduct to existing suppliers, make it available to new contractors and suppliers during the onboarding process, and requiring undertakings from the DRA Group's suppliers and contractors to adhere to the requirements of the Supplier Code of Conduct.





## 6. ACTIONS TAKEN TO MITIGATE RISKS OF MODERN SLAVERY

### 6.2 POLICIES, STANDARDS AND GOVERNANCE (CONTINUED)

#### SPEAK-UP POLICY AND STANDARD

The Speak-Up Policy and Standard outline the DRA Group’s commitment to encouraging its directors, management, employees and third parties to ‘speak up’ and raise their concerns if they become aware of potential misconduct, including suspected issues of modern slavery, and does 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 in writing and by telephone.

These reports are confidential and can be made on an anonymous basis.

More information on our Speak-Up Policy and Standard and the relevant contact details of our speak-up service are available on our website at [www.draglobal.com](http://www.draglobal.com).

#### HUMAN RIGHTS AND MODERN SLAVERY STANDARD

Respect for human rights is fundamental to the sustainability of the DRA Group and the communities where it operates. In accordance with the Code of Conduct and company values, the DRA Group is committed to ensuring that people are treated with dignity and respect. The 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 Organization Declaration on Fundamental Principles and Rights at Work*, the *United Nations Global Compact* and the *United Nations Guiding Principles on Business and Human Rights*.

The DRA Group’s approach to addressing modern slavery risks is guided by the Group’s Sustainability Policy, the Human Rights and Modern Slavery Standard, and the overarching Risk Management Framework and Compliance Management Framework, and consists of the operations and supply chain management elements described in **Figure 6**.



Figure 6: The DRA Group’s governance approach to address modern slavery risks

### 6.3. TRAINING AND AWARENESS

Increasing awareness of modern slavery is a critical aspect in identifying and addressing modern slavery risks. The DRA Group has developed bespoke e-learning training on the Code of Conduct, as well as the Human Rights and Modern Slavery Standard that is planned for delivery to all employees of the DRA Group during the next reporting period.

Employees will be required to undertake this training on an annual basis with more targeted training and increased frequency for those employees determined to have greater exposure to modern slavery risks.

## 6. ACTIONS TAKEN TO MITIGATE RISKS OF MODERN SLAVERY

### 6.4. REPORTING OF HUMAN RIGHTS AND MODERN SLAVERY CONCERNS

In addition to the speak-up service (whistle-blower) referred to earlier, the DRA Group's Human Rights and Modern Slavery Standard also provides for the reporting and redress in relation to perceived or actual human rights or modern slavery violations and ensures a mix of senior management and independent control functions to receive and investigate such reports including escalation protocols for reporting internally and externally.

During the reporting period, no human rights or modern slavery concerns were identified or reported within the DRA Group's supply chain or its operations.

### 6.5. SUPPLIER CONTRACTUAL TERMS AND CONDITIONS

The DRA Group has reviewed its supplier contracting arrangements, including terms and conditions, and identified the need to update our processes to enhance our management of modern slavery risk. We have developed a Supplier Code of Conduct and have commenced with the amendment of standard contracts across the DRA Group to include modern slavery warranties and obligations. We will continue to implement these revised arrangements in the next reporting period.

### 6.6. SUPPLIER SCREENING AND DUE DILIGENCE

During the reporting period, the DRA Group developed and implemented a Sanctions, Restrictions and Due Diligence Compliance Framework that sets out the due diligence responsibilities of the DRA Group and our employees when dealing with third parties and the minimum expectations that such third parties working with the DRA Group must adhere to. The due diligence and modern slavery risk identification process will be supported by a Supplier Questionnaire-based assessment which is planned to be rolled out in the next reporting period.

The DRA Group identified and developed modern slavery risk assessment criteria to apply to the current supply chain database, based on industry, geography, category of risk and spend criteria.

The same risk assessment process and application of the same criteria will apply to new suppliers as part of the onboarding process with identified high-risk suppliers subject to enhanced supplier due diligence screening.

### 6.7. SUPPLIER ENGAGEMENT

The DRA Group engages with our suppliers both formally and informally by various means, including onsite visits by our project, operations and management teams, structured meetings, documentation submission and audits.

These engagements provide valuable insight into the experience of our suppliers, and their employees, and aims to authenticate the information supplied. We set corrective actions from these engagements and findings will be used to inform and improve our future due diligence assessments. The future introduction of Supplier Questionnaires for current and potential suppliers will further support modern slavery risk identification and application of corrective measures.

The DRA Group will continue to build relationships with our suppliers and work with various organisations to prevent modern slavery risks within our supply chain. These efforts will be directly supported by the Supplier Code of Conduct.

We recognise the importance of building greater understanding of modern slavery risks and the requirements of DRA Group's employees who are responsible for supplier relationships and oversight so that they are equipped to provide guidance to our clients, partners and suppliers to comply with our expectations.



## 7. MEASURING EFFECTIVENESS

During the reporting period, the DRA Group was primarily focused on developing and implementing the governance measures required to identify, assess and respond to risks of modern slavery within our operations and supply chain, which will continue in the next reporting period. As we continue to build on our understanding of potential risks of modern slavery in our operations and supply chain, we have identified various improvement initiatives to continuously improve the effectiveness of our modern slavery risk management approach, as further detailed in the next section.





---

## 8. CONTINUOUS IMPROVEMENT

The DRA Group is committed to the continuous improvement of its modern slavery risk management processes. A range of actions have commenced, or are planned, that will improve the identification and treatment of modern slavery risks across the DRA Group's operations and supply chain. Going forward, we are committed to mature our modern slavery risk management approach, building on our achievements as reported in this statement. In particular, we plan to implement the following activities:

- // Continue to implement and improve the DRA Group's processes and procedures that support the identification and treatment of modern slavery risks, with a focus on countries and jurisdictions that have an inherent high risk of modern slavery.
- // Continue screening of our supplier database for various categories of human rights violations and undertake enhanced due diligence, where required, supported by a newly developed Supplier Questionnaire.
- // Continue rolling out the Supplier Code of Conduct and revised procurement and subcontractor terms and conditions addressing modern slavery and human rights risks.
- // Roll out of our Code of Conduct and Human Rights and Modern Slavery Standard awareness training for DRA Group employees.
- // Development of supporting procedures to support the implementation of the Sanctions, Restrictions and Due Diligence Framework.
- // Introduction of a Supplier Questionnaire process into third-party risk management practices.
- // Periodic review and monitoring of the effectiveness of the modern slavery framework and associated policies and procedures.



## ANNEXURE: 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 the Act.

Mandatory reporting criteria	Section	Page Number
Identify the reporting entity.	1	Page 2
Describe the reporting entity's structure, operations and supply chains.	3	Pages 4 - 7
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	5	Page 9
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.	4, 6	Pages 8, 10 - 12
Describe how the reporting entity assesses the effectiveness of these actions.	7	Page 13
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).	6.1	Page 10
Any other information that the reporting entity, or the entity giving the statement, considers relevant.	8	Page 14





## CONTACT US

DRA welcomes your feedback. For further information in relation to this statement, please contact:

**Leanne Heerink**

Group Compliance Officer

DRA Global Limited

Ph: +61 8 6163 5968

[complianceofficer@draglobal.com](mailto:complianceofficer@draglobal.com)

[draglobal.com](http://draglobal.com)

### HEAD OFFICE

LEVEL 8, 256 ADELAIDE TERRACE / PERTH WA 6000 / AUSTRALIA  
Telephone / +61 (0)8 6163 5900

### POSTAL ADDRESS

PO BOX 3130 / EAST PERTH WA 6892 / AUSTRALIA