



# SPEAK-UP STANDARD


## COMPLIANCE

*The DRA Group*

DRA-00-CL-STD-002

Revision: 2

**APPROVAL**

| Description | Name        | Title                   | Signature  | Date             |
|-------------|-------------|-------------------------|--|------------------|
| Approval    | James Smith | Chief Executive Officer |  | 15 December 2025 |

**REVISION RECORD**

| Revision | Description  | Date              |
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| 0        | Issued for approval  | 2 December 2020   |
| 1        | Revised for Approval   | 27 September 2022 |
| 2        | The Standard was updated to reflect revised contact details for DRA's external reporting provider, including the contact number, email address, and website. | 15 December 2025  |

## REFERENCES AND EXAMPLE DOCUMENTS

| Document Number   | Document Description                               |
|-------------------|--|
| DRA-00-GL-COC-001 | Code of Conduct                                    |
| DRA-00-PC-STD-007 | Discipline and Termination Standard                |
| DRA-00-GL-POL-001 | Anti-Bribery and Corruption Policy                 |
| DRA-00-GL-POL-002 | Ethics Policy                                      |
| DRA-00-PC-STD-006 | Grievance Handling and Dispute Resolution Standard |
| DRA-00-LE-STD-001 | Legal Standard                                     |
| DRA-00-GL-POL-003 | Speak Up Policy                                    |

## ABBREVIATIONS, TERMS AND DEFINITIONS

| Abbreviations/Terms            | Definition  |
|--------------------------------|---|
| “APRA”                         | The Australian Prudential Regulation Authority  |
| “ARC”                          | The Audit and Risk Committee,   |
| “ASIC”                         | The Australian Securities and Investments Commission  |
| “ATO”                          | The Australian Taxation Office  |
| “Board”                        | The board of directors of DRA Global  |
| “BU” or “BUs”                  | Business Units of DRA: APAC, EMEA Projects, Minopex, North America, South America, SENET  |
| “CEO”                          | The Chief Executive Officer   |
| “CFO”                          | The Chief Financial Officer of DRA Global   |
| “Compliance Officer”           | The employee or function responsible for compliance and ethics management for a particular BU within the DRA Group  |
| “Corporations Act”             | The Corporations Act 2001, governing the formation and conduct of legal entities registered in Australia  |
| “Detrimental Treatment”        | Includes dismissal, injury, demotion, harassment, discrimination, disciplinary action, bias, threats, harm, and damage to property, reputation or a person’s business or financial position or other unfavourable treatment   |
| “Director”                     | Member of the Board   |
| “Discloser” or “Whistleblower” | A person who has made a Protected Disclosure  |
| “DRA Group” or “DRA”           | DRA and its controlled entities   |
| “Employees”                    | Any current employee of the DRA Group, including Directors, prescribed officers, other company officers, and both permanent and temporary staff. For the purposes of this Standard, the definition extends to former employees, as well as the partners, spouses, dependants, and relatives of both current and former employees. |
| “EVP”                          | Executive Vice-President  |
| “EXCO”                         | The Executive Committee comprising the CEO, CFO and the EVPs of the DRA Group   |
| “MD”                           | Managing Director of DRA BUs  |
| “Protected Disclosure”         | The part of a disclosure relating to a Reportable Matter contained in a Speak Up Report that qualifies for protection under applicable whistleblower protection laws in the jurisdictions where the DRA Group operates  |
| “Recipient”                    | The person to whom a Speak Up Report is made  |

| Abbreviations/Terms           | Definition   |
|-------------------------------|--|
| “Reportable Matter”           | Unacceptable Conduct within the DRA Group, including conduct that may be illegal, unethical or improper, or any breach of the DRA Group’s policies, standards and procedures, by an Employee or Third-Party  |
| “Senior Management”           | Any person to whom authority has been granted by the CEO in terms of a delegation of authority from the CEO  |
| “Speak Up Protection Officer” | The individual that is responsible for administering the day-to-day activities associated with Speak Up Reports, the DRA Group Speak Up policy and this Standard, through the Speak Up Protection Office   |
| “Speak Up Report”             | A verbal or written report by an individual through one of the designated reporting channels outlined in the DRA Group Speak Up policy or this Standard  |
| “This Standard”               | This standard that sets out the DRA Group’s expectations around processes and internal controls and the manner in which internal controls are identified, defined and monitored  |
| “Tax Administration Act”      | The Australian Tax Administration Act 1953 (Cth)   |
| “Third Parties”               | Current and former clients, business partners, suppliers, contractors, sub-contractors, joint venture business partners, and service providers to any DRA Group entity (and their current and former employees), any associates of these parties or their family members, as well as other persons covered by “Speak Up / Whistleblower legislation” applying in a country in which the DRA Group operates |
| “Unacceptable Conduct”        | Any misconduct or improper behaviour, situation, or circumstance (i.e. violations of DRA’s policies, including but not limited to, those regarding harassment, violence in the workplace, ethics, conflicts of interest, or other inappropriate or unwelcome behaviour) occurring within the DRA Group. Examples of Unacceptable Conduct are set out in section 6.1  |

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# DRA's SPEAK UP PROCESS



## IMPORTANT

DRA's Speak-Up process depicted above is provides an outline of the process only. This Standard must be read and understood in its entirety.

As a global organisation, subject to various legal and regulatory requirements, DRA is committed to implementing effective policies and processes that encourage **whistleblowers to come forward with their concerns about misconduct or breaches of the law and ensuring their protection when they make a disclosure in good faith.**

It is recognised that the details in this Speak Up Standard may not cover all eventualities and specific circumstances that may arise.

In such cases DRA may seek further professional advice and undertake a **reasonable, fair, balanced, common sense and ethical approach in accordance with applicable laws and regulations.**

Personal work-related grievances<sup>1</sup> are not reportable, nor dealt with, under this Standard. Refer to section **Error! Reference source not found.** for examples of personal work-related grievances.

<sup>1</sup> In this Standard, the term *grievance* is used in a general sense, consistent with our global policies and grievance handling procedures, to refer to any concern or complaint raised in the workplace. This usage is not intended to refer specifically to formal union-related grievances, which are governed by separate processes as outlined in collective bargaining agreements. Employees covered by such agreements should continue to use the appropriate channels designated for union-related grievances.

## 1 INTRODUCTION

DRA is committed to conducting business honestly, with integrity, and in accordance with its values, principles and standards of expected behaviour.

Given the DRA Group operates in multiple countries with differing legal, regulatory and governance regimes, what is required or appropriate can vary between jurisdictions. There may be circumstances in which some of the requirements set out in this Standard are not required or appropriate to be applied in a particular jurisdiction, in which case DRA will apply the legal requirements in the relevant jurisdiction.

## 2 SCOPE

This Standard applies to all companies, joint ventures and operations controlled by the DRA Group.

This Standard applies to Employees and Third Parties.

This Standard does not replace other policies, frameworks, standards, and procedures that apply in relation to Speak Up and should be read in conjunction with such other documents and approvals under those documents obtained. Adherence to both this Standard and the business unit standards / procedures is required.

A Discloser may qualify for protection as a whistleblower under legislation if they make a disclosure or report of Unacceptable Conduct.

People, other than those to whom this Standard applies, are welcome to raise concerns about Unacceptable Conduct or any aspect of DRA's operations. These concerns will be taken seriously and addressed appropriately. However, they may not always be processed under this Standard, particularly where legal or procedural thresholds for whistleblower protections are not met. Nonetheless, DRA remains committed to addressing all concerns in a fair and professional manner, through the appropriate channels, even if they do not meet the criteria for Protected Disclosures under this Standard.

## 3 OBJECTIVES

This Standard describes DRA's approach to maintaining an open, transparent working environment in which Employees and Third Parties are encouraged to report Unacceptable Conduct and are able to report instances of Unacceptable Conduct without fear of intimidation or retaliation.

The objectives of this Standard are to:

- Help deter, detect and address Unacceptable Conduct;
- Help provide Employees, Third Parties and others with a supportive working environment in which they feel able to safely and securely report Unacceptable Conduct;
- Provide information about the protections available to Employees, Third Parties and others who report Unacceptable Conduct;
- Provide information about to whom reports of Unacceptable Conduct may be made, how they may be made, and how DRA will investigate them where appropriate; and
- Help support and protect people who report Unacceptable Conduct.

## 4 KNOWLEDGE OF THIS STANDARD

All employees are required by the Code of Conduct to make all decisions in the best interests of the DRA Group and within the law. Acting within the law means not only complying with any legislation but also complying with common law and judge-made law. The law requires an Employee to act honestly, diligently and in good faith in the course of their employment and not allow non-work-related activities to unduly influence decisions and conflict with the proper performance of their duties. Employees should consult with their business' legal support to ascertain whether any specific conduct in the course of their employment is within the law.

This Standard is to be regularly consulted in terms of guidelines, rules, and boundaries within which the DRA Group manages Speak Up Reports.

This Standard will be freely accessible on the DRA Group Intranet and the DRA Global website, with any changes communicated within the DRA Group in as practical a manner as possible.

All relevant Employees and Third Parties are required to be fully knowledgeable of, and adhere to, this Standard. The Speak Up Protection Officer, in conjunction with the Compliance Officers, will provide training on this Standard.

## 5 ROLES AND RESPONSIBILITIES

| Role   | Responsibility  |
|--|---|
| Board  | <ul style="list-style-type: none"> <li>Promoting the desired culture of the DRA Group and monitoring DRA's reputation, culture and commitment to compliance, ethics and integrity.</li> </ul>   |
| ARC  | <ul style="list-style-type: none"> <li>Overseeing summary reports, recommendations and any issues / trends that are related to DRA's culture of compliance, ethics and integrity.</li> <li>Reviewing how management have handled Speak Up disclosures.</li> </ul>   |
| CEO  | <ul style="list-style-type: none"> <li>Approving this Standard and any material amendments thereto.</li> <li>Implementation of and compliance with DRA's Speak Up Standard and regulatory obligations.</li> <li>Ensuring DRA's Speak Up management system is implemented under the authority of the Speak Up Protection Officer in conformance with this Standard.</li> <li>Subject to any conflict of interest, ensuring appropriate action is taken when findings of Unacceptable Conduct are made.</li> </ul>  |
| EXCO, MDs and Senior Management  | <ul style="list-style-type: none"> <li>Ensuring this Standard is communicated and followed.</li> <li>Promoting an open and safe workplace culture that encourages Employees to report instances of Unacceptable Conduct.</li> <li>Implementation of actions (as appropriate) to address Unacceptable Conduct.</li> </ul>  |
| <b>Recipient</b><br>/ Speak Up Protection Officer<br>/ Any Director, CEO or EXCO<br>/ Other (as detailed in the Annexures) | <ul style="list-style-type: none"> <li>Receiving reports on Unacceptable Conduct.</li> <li>Responding to the Discloser in a timely manner.</li> <li>Maintaining strict confidentiality and protecting the identity of the Discloser.</li> <li>Liaising with the Speak Up Protection Officer for effective, timely and appropriate management of reports.</li> </ul>   |
| <b>Speak Up Protection Officer</b>   | <ul style="list-style-type: none"> <li>Providing advice to Recipients (as appropriate).</li> <li>Assessing Speak Up Reports as to whether the alleged conduct falls within this Standard.</li> <li>Overseeing risk assessments and enabling support and protection to individuals who have or may report concerns.</li> <li>Determining whether a report warrants any action or investigation.</li> <li>Coordinating, managing or conducting an investigation.</li> <li>Reporting to the ARC.</li> <li>Communicating this Standard and providing relevant training, including the training of Recipients and investigators of Protected Disclosures on how to maintain confidentiality.</li> <li>Promoting a positive Speak Up culture within DRA.</li> </ul> |
| <b>People &amp; Culture</b>  | <ul style="list-style-type: none"> <li>Ensuring workplace grievances are handled in accordance with DRA's grievance policies, standards and procedures.</li> <li>Referring matters of a systemic or serious nature to the Speak Up Protection Officer.</li> <li>Managing disciplinary processes for employees who may have been identified as having breached this Standard or committed a wrongdoing identified via a Speak Up Report.</li> </ul>  |

| Role                        | Responsibility  |
|-----------------------------|---|
| Employees and Third Parties | <ul style="list-style-type: none"> <li>Providing assistance and support to anyone concerned about retaliation for making or wanting to make a Speak Up Report.</li> <li>Complying with this Standard.</li> <li>Reporting any Unacceptable Conduct or concerns which they reasonably suspect has occurred to those persons described in this Standard.</li> <li>Cooperating with Speak Up investigations.</li> <li>Not disadvantaging or victimising individuals who report concerns, or anyone conducting or assisting in a Speak Up investigation.</li> <li>Act honestly when reporting and responding to concerns or investigations relating to the DRA's Speak Up Policy and this Standard.</li> </ul> |

## 6 UNACCEPTABLE CONDUCT

### 6.1 Conduct covered by this Standard

Unacceptable Conduct covered by this Standard includes (but is not limited to) any conduct which:

- Is dishonest, fraudulent or corrupt;
- Is illegal, such as theft, drug sale or use, violence, harassment or intimidation, criminal damage to property (physical or virtual) or other breaches of laws or regulations;
- Involves price-fixing, cartel conduct, or other anti-competitive behaviour especially on a bid, proposal, offer or contract;
- Unethical behaviour such as a serious failure to comply with appropriate professional standards, discrimination, human rights abuses, breaches of DRA's policies and Code of Conduct;
- Is potentially damaging to DRA or an Employee, such as unsafe work practices or substantial wasting of company resources;
- May cause financial loss to DRA, damage its reputation or otherwise be detrimental to DRA's interests;
- Poses a significant risk to public safety;
- Involves engaging in or threatening to engage in detrimental conduct against a person who has made a report of Unacceptable Conduct, or is believed or suspected to have made, or be planning to make, a report of Unacceptable Conduct;
- Relates to Unacceptable Conduct; or
- Involves any other kind of circumstances in relation to DRA that is suspected to violate applicable law.

DRA does not tolerate false, malicious, or vexatious Speak Up Reports. Any Discloser who is found to have intentionally made such a report may face appropriate disciplinary action. In certain jurisdictions where DRA operates, knowingly making a false disclosure may also constitute a criminal offence.

However, it is important to distinguish between a report that is unsubstantiated and one that is made in bad faith. A Speak Up Report that cannot be proven or verified does not, on its own, indicate malicious intent. To be eligible for protection under applicable whistleblower legislation, a Discloser must have reasonable grounds to suspect that Unacceptable Conduct has occurred.

To support this, Disclosers are encouraged to provide as much relevant detail and supporting evidence as possible when submitting a report.

## 6.2 Conduct that is not covered by this Standard

Reports should not be made under this Standard about 'business as usual' risks or issues, disagreements over business decisions or minor matters. Those matters should be raised with line management or the Human Resources Manager for that business or country of operation. Key matters that are not covered by this Standard includes (but are not limited to):

- Breaches of DRA's Code of Conduct that are otherwise not covered by this Standard, or
- Personal work-related grievances which means a grievance about any matter in relation to an Employee's employment or former employment. Examples of a personal work-related grievance include (but are not limited to):
  - An interpersonal conflict between you and another Employee, including management (with the exception of conflict involving discrimination, harassment or bullying behaviours, as defined in the Respectful Workplace Standard);
  - A decision that does not involve a breach of workplace laws;
  - A decision about your engagement, performance, transfer or promotion;
  - A decision about your terms and conditions of engagement, payroll or remuneration; or
  - A decision to suspend or terminate your engagement, or otherwise to discipline you.

These matters may be raised and reported in accordance with DRA's Code of Conduct or Grievance Handling and Dispute process. Employees can speak to the Human Resources Manager for guidance on DRA's Grievance Handling and Dispute Resolution Standard.

## 6.3 When to Report

A Speak Up Report can be made at any time, including outside of business hours and should be made at the earliest possible stage after a suspicion of Unacceptable Conduct. This provides DRA with the best opportunity to effectively address the matter and take precautionary or preventative action.

## 7 REPORTING UNACCEPTABLE CONDUCT

DRA recognises that those who work for and with the DRA Group can be the first to uncover Unacceptable Conduct and encourages anyone who suspects Unacceptable Conduct to speak up. In accordance with this Standard, DRA will support those who speak up and protect them from any **Detrimental Treatment** for doing so.

### 7.1 How to make a report under this Standard

#### 7.1.1 Recipients

If an Employee would like to make a report to an eligible **Recipient** under applicable whistleblower laws (and receive the protections under those laws), they can make a report of Unacceptable Conduct to:

- The Speak Up Protection Officer  
[mailto: speakupprotectionofficer@draglobal.com](mailto:speakupprotectionofficer@draglobal.com); or
- Any recipient in a BU listed in Annexures A to D.

Reports can be made by email, telephone or face to face.

Contact email and phone details for eligible recipients can be found on the DRA intranet, DRA Global website or by contacting the DRA Speak Up Hotline service provider listed in section 7.1.2.

Where an Employee makes a report to a Recipient, the Recipient is to notify the Speak Up Protection Officer, providing the Speak Up Protection Officer is not conflicted, to assist in the coordination, management and recording of any investigation.

Where a conflict is determined with the Speak Up Protection Officer, the Recipient can refer the matter to the Chair of the ARC or, alternatively, to the Group Head of Legal for advice.

### 7.1.2 DRA Speak Up Hotline Service

To ensure confidence in the DRA's Speak Up arrangements, DRA has contracted with external service providers in certain regions to receive Speak Up reports on its behalf and provide language translation as appropriate. These services, are manned by professional and experienced persons, are completely secure and only the information contained in the report will be passed onto DRA for investigation.

A Speak Up Report should be made via the Speak Up service or to the Group Speak Up Protection Officer using the details in the table below.

| Region                                | Service Provider  | Free Phone                                       | Email  | Online   |
|---------------------------------------|---|--|--|--|
| APAC                                  | Deloitte Tip-Offs Anonymous                                     | 1 800 633 293                                    | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a>   | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| EMEA<br>(Including SENET and Minopex) | Deloitte Tip-Offs Anonymous                                     | +27 (0) 800 384 427<br>or<br>+27 (0) 31 571 8757 | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a>   | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| NAMER (USA)                           | Deloitte Tip-Offs Anonymous<br>or<br>DRA Internal Legal Counsel | 1 866 317 7033<br><br>+1 724 754 9799            | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a><br><br><a href="mailto:complianceAMER@draglobal.com">complianceAMER@draglobal.com</a> | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| NAMER (Canada)                        | Deloitte Tip-Offs Anonymous                                     | 1 866 317 7033                                   | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a>   | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| SAMER (Peru)                          | Deloitte Tip-Offs Anonymous                                     | 05117097942                                      | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a>   | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| SAMER (Chile)                         | Deloitte Tip-Offs Anonymous                                     | 800 914 384                                      | <a href="mailto:dra@tip-offs.com">dra@tip-offs.com</a>   | <a href="http://www.tip-offs.com">www.tip-offs.com</a> |
| Global                                | Internal<br>(Speak Up Protection Officer)                       |  | <a href="mailto:speakupprotectionofficer@DRAGlobal.com">speakupprotectionofficer@DRAGlobal.com</a>   |  |

### 7.1.3 External Recipients

Reports may also be made under whistleblower laws, where applicable, to the following external eligible recipients:

- A lawyer (but not a lawyer employed by DRA) for the purposes of obtaining legal advice or representation. As stated in the Legal Standard, members of the DRA legal team cannot act on behalf of individual employees as their client is DRA itself;
- Appropriate and relevant government bodies that are prescribed in jurisdictional legislation; and
- In Australia, if the report relates to DRA's tax affairs, the Commissioner of Taxation (ATO).

## 7.2 Anonymous reporting

DRA recognises that there may be issues of such sensitivity that an Employee may wish to make an anonymous report. Anonymous reports can be made to DRA's Speak Up hotline.

Anonymous Disclosers (who have not given their name at all) can choose to remain anonymous over the course of any investigation and afterwards.

DRA's Hotline Service will provide appropriate guidance on addressing suspected Unacceptable Conduct anonymously under this Standard.

### 7.3 Information needed in the report

For a Speak Up Report to be properly considered, it must contain wherever possible as much information on the **Reportable Matter**, including:

- A clear statement of concern and or the allegation(s);
- Detailed information that led the Discloser to suspect the Reportable Matter;
- Dates, times and locations involved;
- Name of the person(s) involved;
- Possible witnesses to the events;
- Documentation and evidence of the events if available (e.g. papers, invoices, photos, emails); and
- Any steps already taken to report the matter elsewhere or to resolve the concern.

If a report does not contain sufficient information to form a reasonable basis for investigation, additional information may be requested. If this additional information cannot be obtained, it may not be possible to carry out the investigation and the report is closed.

Speak Up Reports will be assessed or investigated in accordance with the process set out in this Standard.

### 7.4 Legal advice

A Recipient or the Speak Up Protection Officer may seek advice from the Group Head of Legal as to their duties and obligations under this Standard, relevant legislation or the general law. Where appropriate, advice or assistance may also be provided by a Compliance Officer or an external legal practitioner (as determined by the BU General Counsel or Group Head of Legal).

## 8 HANDLING SPEAK UP REPORTS

### 8.1 Assessing a Speak Up Report

The Speak Up Hotline or the Recipient will refer the Speak Up Report, along with any additional information provided by the Discloser, to the Speak Up Protection Officer who will assess the information to determine:

- The nature, risks and complexity of the information;
- Whether the Speak Up Report is to be accepted - based on a consideration of legal requirements, principles of fairness and due process, DRA policy and standards;
- Whether the report qualifies as a Reportable Matter and Protected Disclosure;
- Level of risk and prioritisation (e.g., matters that are highly sensitive and may require fast tracking);
- If the concern is being addressed or has been addressed through alternative and or overlapping avenues – including whether the investigation needs to be delayed or otherwise halted so as not to compromise alternative decision-related mechanisms (for example litigation);
- Whether the Speak Up Report qualifies for protections under applicable whistleblower laws; and
- If necessary, how that investigation may be effectively conducted considering the nature, complexity, confidentiality and protection requirements.

If the Speak Up Report is assessed as containing information in respect of a Reportable Matter, the part of the report relating to a Reportable Matter will be considered as a Protected Disclosure and will progress in accordance with this Standard.

If the Speak Up Report is not considered to be a Reportable Matter, the matter will be, if appropriate, referred to an appropriate department within DRA for consideration (e.g. People & Culture, Finance, Risk, Legal, etc) and the Discloser, where contactable, will be informed of this via the avenue through which they reported (e.g. Hotline or a Recipient). The matter will then no longer be treated in accordance with this Standard.

All assessments should be made within five working days of receipt of the Speak Up Report and prior to the commencement of any investigation.

## 8.2 Maintaining confidentiality

All Protected Disclosures must be handled confidentially. Recipients, investigators and anyone involved in the handling of Protected Disclosures must not reveal the Discloser's identity or information that is likely to lead to their identification to anyone (unless required by law) without the Discloser's consent.

Information about the Protected Disclosure can only be disclosed if it is reasonably necessary for the report to be investigated.

Recipients, investigators and anyone else involved in the handling of Protected Disclosures must take all steps to reduce the risk that a Discloser will be identified, including:

- Removing as much identifying information as possible when processing the Protected Disclosure (e.g. making the language gender neutral when passing it to investigators); and
- Keeping all records and communications of Protected Disclosures secure.

### 8.2.1 Consent

Disclosers will be asked to consent to sharing the information contained in their Protected Disclosure (and if required, their identity), so that the Protected Disclosure can be considered in accordance with this Standard. Disclosers who withhold consent must understand that:

- The limited sharing of identity and the information provided may limit DRA's ability to take any action in relation to the disclosure and to effectively deal with the matters raised, including undertaking an investigation where appropriate; or
- Depending on the nature and seriousness of the matters raised, DRA may proceed to use any information reasonably necessary for the Protected Disclosure to be investigated.

## 8.3 Assessing the risks to the Discloser

The risks to a Discloser must be assessed in order to determine the best ways to mitigate any risk of retaliation or detriment being caused to the Discloser.

## 8.4 Unacceptable Conduct of senior personnel

Where a report of Unacceptable Conduct relates to the conduct of:

- a) A Director, other than the Chairman of the Board, the matter will be assessed and handled by the Chairman of the Board;
- b) CEO, EXCO, Group Head of Legal or any Employee who reports directly to the CEO, the matter will be assessed and handled by the Chairperson of the Board;
- c) The Chairperson of the Board, the matter will be assessed and handled by the Chairperson of the ARC or, alternatively referred to the Group Head of Legal for advice;
- d) The Speak Up Protection Officer, the matter will be assessed and handled by the Chairperson of the ARC or, alternatively referred to the Group Head of Legal for advice.

The Chairman of the Board and Group Head of Legal will have access to resources and advice, and shall be assisted by relevant Employees, as appropriate, considering reporting lines and potential conflicts of interest.

In these cases, the principles of this Standard will apply, with the assessment and handling process followed, as appropriate, to fulfil those principles.

## 8.5 Involvement in Unacceptable Conduct

Reporting Unacceptable Conduct does not excuse someone from responsibility if they were involved in the misconduct. However, if a Discloser comes forward and makes a report in good faith, their actions in doing so may be considered when deciding whether any disciplinary action is needed, and what that action should be.

## 8.6 Feedback to the Discloser

Recipients of Protected Disclosures should ensure that information about how the matter is being handled is provided to the Discloser on a regular basis. This includes information, as appropriate, about the progress of the matter and, where possible, the outcomes of any investigations.

Information provided may be limited due to privacy considerations, fairness to all involved and the need to ensure the integrity of investigations.

It is the responsibility of the Speak Up Protection Officer to ensure feedback is provided to the Discloser or to the relevant Recipient who is in contact with the Discloser.

## 9 INVESTIGATING REPORTS

### 9.1 Purpose of investigations

The investigation processes will vary depending on the nature and complexity of the Unacceptable Conduct reported.

The purpose of the investigation is to determine whether the concerns raised in the Protected Disclosure are substantiated, with a view to DRA then rectifying and/or preventing any wrongdoing uncovered.

The investigation will be conducted in an objective, thorough, fair, independent manner and otherwise, as is reasonable and appropriate, having regard to the nature of the Protected Disclosure and the circumstances.

DRA may need to inform local law enforcement or a relevant regulatory body as appropriate.

### 9.2 Who investigates a report

All Protected Disclosures will be taken seriously. Matters for investigation will be allocated by the Speak Up Protection Officer to investigators who are independent of the alleged Unacceptable Conduct or other matters referred to in the Protected Disclosure.

On a case-by-case basis, the investigation officer may be either senior management, BU legal counsel, external legal counsel, auditor, or another suitably qualified person.

Reports may not be able to be investigated (fully or at all) if DRA is:

- Not able to contact the Discloser who has made the report (e.g. because they have made an anonymous disclosure); and/or
- Insufficient information and/or evidence has been provided; and/or
- Unable to achieve any outcome (e.g. all Directors being suspected of Unacceptable Conduct preventing any practical outcome); and/or
- The principles of natural justice/procedural fairness dictate that a proper investigation cannot be conducted.

A matter will, in most cases, be allocated for investigation within 5 working days of the Speak Up Report assessment and Discloser risk assessment.

### 9.3 Principles of investigation

The investigator must ensure:

- An investigation plan is provided to the Speak Up Protection Officer for review prior to the commencement of the investigation. This should be submitted within 5 working days of having been allocated the investigation;
- The investigation is conducted in a procedurally fair, independent and discreet manner into the substance of the Speak Up Report to determine whether there is evidence to support the matters raised. This includes using reasonable efforts to collect available relevant evidence which may assist to substantiate or not substantiate the alleged Unacceptable Conduct;

- Those who have been adversely mentioned in the Protected Disclosure will:
  - be treated fairly,
  - can ask questions of the investigator and request support,
  - will have access to employee assistance support, and
  - will have an opportunity to respond to any adverse conclusions made in respect of them or their conduct prior to formal findings against them being made.
- Appropriate records of how the investigation was conducted along with evidence for any findings made e.g. witness statements, records of interviews or documentation are retained securely and provided to the Speak Up Protection Officer; and
- All actions possible should be taken to reduce the risk that a Discloser will be identified or subjected to any Detrimental Treatment.

Unless there is a legitimate reason not to do so, Employees are expected to assist the investigator(s) with their investigations, by responding promptly, providing honest and complete information to the best of their ability and knowledge, and maintaining confidentiality.

#### 9.4 Investigations which may be suspended

An investigation of Unacceptable Conduct maybe suspended or halted due to:

- Actual or pending legal proceedings which are perceived to overlap or is related to the Unacceptable Conduct;
- The Unacceptable Conduct is related to another investigation in progress, with the outcome likely to impact the investigation findings; and/or
- The Speak Up report is suspected and/or confirmed of being made for an improper purpose.

Should any of the above issues arise, the Speak Up Protection Officer or investigator (if appropriate) will seek legal advice from the Group Head of Legal who may refer the matter to an external legal practitioner.

#### 9.5 Timelines for Investigation

Investigation timelines will vary according to the seriousness of the Protected Disclosure, complexity of the Unacceptable Conduct being investigated, and/or the number of people involved.

- Investigations should be commenced within 5 working days after the investigation plan is approved by the Speak Up Protection Officer;
- Investigators should provide weekly updates to the Speak Up Protection Officer on the progress of an investigation;
- A draft report which includes all relevant findings of the investigation should be submitted as soon as practical and preferably within 30 working days to the Speak Up Protection Officer for discussion and agreement prior to completion;
- Investigation deadlines can be extended at the discretion of the Speak Up Protection Officer, however any extensions that bring the total length of the investigation beyond 60 working days should be reviewed by the Chairperson of the ARC;
- Final reports should be issued within 10 working days following discussion and agreement of the draft report with the Speak Up Protection Officer; and
- In so far as possible or to the extent required by law, the identity of an Employee who reported the Unacceptable Conduct and the person(s) against who the complaint was made, will be redacted from any written investigation reports unless they have consented to disclosure of their identity.

#### 9.6 Outcomes of investigations

DRA will take any proven cases of Unacceptable Conduct seriously. Action taken against those involved in the Unacceptable Conduct, including but not limited to any disciplinary action, will reflect not only the

conduct that has taken place but, in some cases, the seniority and position of those involved and the potential or actual impact of the Unacceptable Conduct on DRA's culture.

Where issues of discipline arise, the disciplinary process will be managed in line with the Discipline and Termination Standard.

Where allegations of Unacceptable Conduct made against a person cannot be substantiated, the person subject to the allegations will be advised accordingly and will be entitled to continue in their role as if the allegations had not been made. Where the identity of the Discloser is known, DRA will reinforce the person's and DRA's obligations to avoid retaliation and Detrimental Treatment of the Discloser.

A verbal or written notification of the outcome will be made to the Discloser once the matter is finalised. The notification will explain, as appropriate, the findings and actions (if any) taken within commercial, legal and confidentiality constraints.

Once a Speak Up Report has been investigated and the outcome(s) determined, the determination will be considered as final and a further Speak Up Report on, or closely related to, the matter may not be submitted.

#### **9.6.1 Lessons learned**

Following the completion of the investigation and any related disciplinary action, the outcomes of the investigation and the Unacceptable Conduct involved (either substantiated or unsubstantiated) may, where appropriate, be shared within DRA (e.g. with Risk, Compliance, People & Culture, Legal functions), governance committees or senior management. When such information is shared, it must:

- Be used to inform and improve processes and practices in the future, mitigate material risks or protect DRA;
- Be shared in a manner which anonymises the information as much as possible, ensuring that the confidentiality of the Discloser's identity is maintained; and
- Encourage and reinforce trust while promoting and developing a positive Speak Up culture within DRA.

No information about the outcomes of investigations of Protected Disclosures should be shared without the approval of the Speak Up Protection Officer.

## **10 PROTECTING DISCLOSERS**

The DRA Group will protect any Discloser from, and will not tolerate, any Detrimental Treatment of a Discloser for making a Protected Disclosure.

### **10.1 Breach of confidentiality and prohibited Detrimental Treatment**

It is a breach of this Standard, and may be an offence, if any Employee or Third-Party, or other party:

- Discloses (other than in accordance with this Standard) the identity of, or information that may lead to the identification of a Discloser; or
- Threatens or engages in conduct that causes any Detrimental Treatment to a person who has made, or could make, a Protected Disclosure because of that disclosure or intention to disclose.

Breaching the confidentiality of, or causing Detrimental Treatment to, a Discloser is not aligned to DRA's values. DRA may also be liable for the actions of its Employees if this occurs.

DRA is committed to protecting Disclosers from breaches of confidentiality and any form of Detrimental Treatment. Appropriate action will be taken against any Employee or Third Party who engages in such behaviour, in accordance with DRA's policies and applicable laws.

## 10.2 Protections and support

A Discloser who:

- Is concerned that their confidentiality has been breached;
- Has suffered, or is likely to suffer, Detrimental Treatment; or
- Otherwise seeks support

should contact the Speak Up Protection Officer.

Any allegation of Detrimental Treatment to a Discloser will be considered a Protected Disclosure and handled in accordance with this Standard.

The Speak Up Protection Officer, along with all Recipients, investigators and anyone else involved in the handling of Protected Disclosures, will work together to support the Discloser and provide practical protections. These protections will be determined on a case-by-case basis and may include:

- Welfare monitoring and support;
- Paid leave during the investigation process; and
- Alternative work arrangements.

Support and protections to Disclosers who elect to remain anonymous will be limited.

## 10.3 Monitoring for Detrimental Treatment

Where they have contact details, the Speak Up Protection Officer will contact the Discloser six months post closure of the Speak Up Report, to determine whether the Discloser has suffered or is concerned about suffering any Detrimental Treatment, which they feel is related to their Protected Disclosure.

## 11 OVERSIGHT OF SPEAK UP REPORTS

The Speak Up Protection Officer will provide the ARC (and possibly other Board committees that may need to assess and take into consideration), at least quarterly, reports on all Speak Up Reports, apart from those that pertain to Board members, including information on:

- The number, and nature of Speak Up Reports made in the last quarter;
- How Speak Up Reports were handled;
- The status of any investigations underway;
- The outcomes of any closed investigations and actions taken as a result of those investigations;
- The time taken to investigate and resolve; and
- The wellbeing and protection of the Discloser.

Where a Speak Up Report involves:

- Bribery or corruption;
  - Matters that could be material or potentially involves a breach of any law; or
  - A complaint of Detrimental Treatment or adverse conduct as a result of making a disclosure,
- the matter must be immediately reported to the to the Chairperson of the ARC.

## 12 FILES AND RECORDS

All files and records relating to the Speak Up Report, the support and protections provided to Disclosers will be retained and secured by the Speak Up Protection Officer as appropriate.

### 13 REVIEW OF THIS STANDARD

This Standard is under the authority of the Chief Executive Officer.

The document owner of this Standard is the CFO.

This Standard is subject to review every two years, or more frequently if required, by the CFO. Should any employee or Third-Party identify any area of this Standard that is unclear, impractical and/or inappropriate, they are requested to raise the matter with the CFO for further evaluation.

### 14 INTERPRETATION

It is recognised that this Standard may not cover all eventualities and may be unclear in certain instances. This will require interpretation of this Standard in order to fulfil the objectives of the Standard. In such instances, Employees and Third Parties are requested not to attempt to interpret this Standard (unless such interpretation is obvious) but rather seek the advice of the Speak Up Protection Officer to assist in this regard.

The Speak Up Protection Officer can be contacted using the details provided below:

| Business Unit | Email  |
|---------------|--|
| All BUs       | <a href="mailto:speakupprotectionofficer@DRAglobal.com">speakupprotectionofficer@DRAglobal.com</a> |

### 15 PROHIBITED CONDUCT

Employees and Third Parties are required to exercise appropriate care when considering compliance with the DRA Group's Speak Up practices. Practices that undermine the intention of this Standard are prohibited and contrary to the Code of Conduct. Such practices include:

- Failure to maintain confidentiality of the Speak Up Report, Discloser identity and other confidential information, and
- Attempting to identify a Discloser, or to threaten or intimidate them in any way to prevent them from making a Protected Disclosure, or after making a Protected Disclosure.

Individuals engaging in any contravention of this Standard, whether deliberate or unintentional, may be liable to appropriate disciplinary action, including possible termination of employment.

Contraventions of "Speak Up / Whistleblower legislation" may also have serious legal consequences for the DRA Group, Employees and Third Parties involved in the contravention and may expose DRA to financial or reputational damage. The application of this Standard will be carefully monitored through regular risk reviews and internal and external audit review.

## Annexure A: APAC

### Making a Report

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte) 1800 633 293**

**email** [DRA@tip-offs.com](mailto:DRA@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English 24 hours a day, 7 days a week.

You may also make a report to our **Speak Up Protection Office** by email:

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[speakupprotectionofficer@DRAglobal.com](mailto:speakupprotectionofficer@DRAglobal.com)

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### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Officer, a report can be made by email, telephone or by post to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer;
- CFO for taxation matters; or
- Employees may also utilise the reporting mechanisms set forth in the local, state, provincial, and federal rules, regulations, or laws they believe may have been violated.

You may also make a report to the following external people or bodies:

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**BDO Audit (WA) Pty Ltd, the auditor of DRA Global**

Level 9, Mia Yellagonga Tower 2  
5 Spring Street  
Perth  
WA 6000  
Australia  
Tel: +61 8 6382 4600  
[www.bdo.com.au](http://www.bdo.com.au)  
Attention: Dean Just

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**ASIC**

Level 1  
11 Mounts Bay Road  
Perth WA 6000  
Australia  
Tel: +61 1300 935 075  
Fax: +61 1300 729 000  
<https://asic.gov.au>

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**APRA**

Level 12  
1 Martin Place  
Sydney NSW 2000  
Australia  
Tel: +61 2 9210 3000  
Fax: +61 2 9210 3411  
<https://www.apra.gov.au>

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**ATO**

Tax Integrity Centre  
Locked Bag 6050  
Dandenong VIC 3175  
Australia  
Tel: 1800 060 062  
<https://www.ato.gov.au>

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A lawyer (to obtain advice or representation about the Corporations Act)

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**Legal Protections**

In addition to the protections we provide to those who make Protected Disclosures under this Standard, there are also strong protections under the *Corporations Act 2001 (Cth)* (Corporations Act) and *Taxation Administration Act 1953* (Taxation Act).

**Protections under the Corporations Act**

The Corporations Act affords protection to those who make Speak Up disclosures in line with this Standard, only if they:

- Are an individual described in this Standard;
- Have reasonable grounds to suspect that the information they are reporting concerns misconduct or an improper state of affairs relating to the DRA Group (reports about personal work-related grievances will not attract the protections of the Corporations Act); and
- Make the disclosure to either:
  - a person designated to receive a Speak Up Report under this Standard,
  - a legal practitioner for the purpose of obtaining legal advice or representation in relation to the operation of the statutory protections under the Corporations Act,
  - one of the following regulators:
    - Australian Securities and Investment Commission, or
    - Australian Prudential Regulation Authority.

Anonymous disclosures made in accordance with the above will be protected under the Corporations Act.

The Corporations Act also provides protections for public interest disclosures and emergency disclosures (to a journalist or member of State or Federal Parliament, or of the legislature of an Australian territory) which meet specific requirements prescribed by the Corporations Act. It is important for a Discloser to understand the criteria for making a public interest or emergency disclosure before one is made.

The protections available under the Corporations Act to an individual who meets the requirements above, in accordance with the Corporations Act, include:

- The right to have their identity protected;
- The right to be protected from Detrimental Treatment;
- A requirement for DRA to take reasonable steps to reduce the risk that the Discloser will be identified as part of any investigation process conducted under this Standard;
- The right not to be required to disclose their identity before any court or tribunal;
- The right to compensation and other remedies; and
- The right to be protected from civil, criminal or administrative liability (including disciplinary action) from making the disclosure or from contractual or other remedies on the basis of the disclosure, and from the admissibility of the information provided in evidence against the person in each case in accordance with the provisions of that legislation.

There are strong penalties under the law, for breaching confidentiality or Detrimental Treatment.

It is a criminal offence if anyone:

- Discloses the identity, or information that may lead to the identification of a person that had made a report; other than in accordance with this Standard; or
- Threatens or engages in conduct that causes any detriment to a person who has made or could make a report under this Standard because of their report or intention to report.

DRA may also be liable for the actions of its employees if this occurs unless it can prove that it took all reasonable steps to reduce the risk that the Discloser will be identified as part of any investigation process conducted under this Standard.

Disclosers who believe that:

- Their confidentiality has been breached; or
- They have suffered or been threatened with retaliatory action or Detrimental Treatment for making a Speak Up disclosure.

should report the matter to any Recipient under this Standard. Disclosers can also report it to ASIC or the ATO (where your report relates to taxation matters).

More information about the Australian Speak Up laws (within the Corporations Act), the protections afforded and how ASIC approach Speak Up can be found on ASIC's website.

#### ***Protections under the Tax Administration Act***

The Tax Administration Act provides protection for disclosures of information that indicates misconduct or an improper state of affairs in relation to the tax affairs of an entity or an associate of an entity where the person considers the information may assist the recipient of that information to perform functions or duties in relation to the tax affairs of the entity or an associate.

Protection is provided for disclosures made to the Australian Commissioner of Taxation, ASIC, APRA under this Standard or as specified in the Tax Administration Act. The protections available to someone who makes a protected disclosure under the Tax Administration Act are similar to those outlined under the Corporations Act.

## Annexure B: EMEA (DRA EMEA, Minopex and SENET)

### Making a Report

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte)** 0800 38 44 27 (International: +27 31 571 5301)

**email** [dra@tip-offs.com](mailto:dra@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English 24 hours a day, 7 days a week. Support in the remaining 10 official South African languages is available on South African business days between 08h00 and 17h00 SAST.

You may also make a report to our **Speak Up Protection Office** by email:

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[speakupprotectionofficer@DRAglobal.com](mailto:speakupprotectionofficer@DRAglobal.com)

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### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Office, a report can be made to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer;
- CFO for taxation matters; or
- Employees may also utilise the reporting mechanisms set forth in the local, state, provincial, and federal rules, regulations, or laws they believe may have been violated.

You may also make a report to the following external people or bodies:

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Legal Advisor (to obtain advice or representation about the Protected Disclosures Act 26 of 2000, as amended)

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Member of Cabinet/ Executive Council of Province, where relevant, where the employer is a Public Sector body

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The Public Protector

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The South African Human Rights Commission

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The Commission for Gender Equality

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The Commission for the Promotion and Protection of the Rights of Cultural, Religious and Linguistic Communities

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The Public Service Commission

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Auditor-General

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Any person, prescribed in certain circumstances, or by applicable laws

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**Special protections under the Protected Disclosures Act 26 of 2000**

The *Protected Disclosures Act 26, 2000* (**Protected Disclosures Act**), includes provisions for employees to report unlawful or irregular conduct by employers and fellow employees, while providing for the protection of employees who Speak Up or “blow the whistle”.

The Protected Disclosures Act gives special protection to disclosures about any misconduct, irregularity or improper state of affairs relating to the Company if the following conditions are satisfied:

The Discloser is:

- An officer or employee of the DRA Group;
- An individual who supplies goods or services to the DRA Group or an employee of a person who supplies goods or services to the DRA Group (defined as a “worker” under such act);

The report is made:

- In good faith; and
- In accordance with this Standard or to any of the external people or bodies listed in this section.

The discloser has reason to believe that the information in their disclosure shows or tends to show:

- That a criminal offence has been committed, is being committed or is likely to be committed;
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which that person is subject;
- That a miscarriage of justice has occurred, is occurring or is likely to occur;
- That the health or safety of an individual has been, is being or is likely to be endangered;
- That the environment has been, is being or is likely to be damaged;
- Unfair discrimination as contemplated in the Promotion of Equality and Prevention of Unfair Discrimination Act, 2000 (Act 4 of 2000); or
- That any matter referred to in the above has been, is being or is likely to be, deliberately concealed.

Under the Protected Disclosures Act an employee may not be subject to ‘Occupational Detriment’ on account, or partly on account of having made a protected disclosure as set out above. ‘Occupational Detriment’ includes:

- Being subjected to any disciplinary action;
- Being dismissed, suspended, demoted, harassed or intimidated;
- Being transferred against his or her will;
- Being refused transfer or promotion;
- Being subjected to a term or condition of employment or retirement which is altered, or kept altered, to his or her disadvantage;
- Being refused a reference, or being provided with an adverse reference, from his or her employer;
- Being denied appointment to any employment, profession or office;
- Being subjected to a civil claim arising from their breach of any confidentiality requirement through the disclosure of a criminal act or of a planned or current failure to comply with a law;
- Being threatened with any of the actions mentioned above; or
- Being otherwise adversely affected in respect of his or her employment, profession or office, including employment opportunities and work security.

Protections and remedies available to employees and workers subject to 'Occupational Detriment' include:

- The right to approach any court having jurisdiction for appropriate relief including the Labour Court to make an appropriate order that is just and equitable in the circumstances, including:
  - Payment of compensation or of actual damages suffered by the employee or worker,
  - an order directing the employer or client, as the case may be, to take steps to remedy the occupational detriment, or
  - Noting that any dismissal for making a protected disclosure is deemed to be an automatically unfair dismissal and any other occupational detriment is deemed to be an unfair labour practice.
- The right, at his or her request, to be transferred from the post or position occupied by him or her at the time of the disclosure to another post or position in the same division or another division of his or her employer on terms no less favourable than the terms and conditions applicable to him or her immediately before his or her transfer; and
- The right to be protected from civil, criminal or disciplinary proceedings by reason of having made the disclosure.

## Annexure C: North Americas

### Canada

#### Making a Report

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte) 1 866 317 7033**

**email** [dra@tip-offs.com](mailto:dra@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English 24 hours a day, 7 days a week and in French (native) on European business days, between 08h00 and 17h00 CET.

You may also make a report to our **Speak Up Protection Office** by email:

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**email** [speakupprotectionofficer@DRAGlobal.com](mailto:speakupprotectionofficer@DRAGlobal.com)

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#### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Office, a report can be made to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer;
- CFO for taxation matters; or
- Employees may also utilise the reporting mechanisms set forth in the local, state, provincial, and federal rules, regulations, or laws they believe may have been violated.

## United States of America (USA)

### Making a Report

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte)** 1 866 317 7033

**email** [dra@tip-offs.com](mailto:dra@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English 24 hours a day, 7 days a week.

You may also make a report to our **Speak Up Protection Office** by email:

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**email** [speakupprotectionofficer@DRAGlobal.com](mailto:speakupprotectionofficer@DRAGlobal.com)

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You may also make a report to our **internal facility** by calling the number provided or by email:

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**calling** +1 724-754-9799

**email** [complianceAMER@draglobal.com](mailto:complianceAMER@draglobal.com)

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### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Office, a report can be made to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer;
- CFO for taxation matters; or
- Employees may also utilise the reporting mechanisms set forth in the local, state, provincial, and federal rules, regulations, or laws they believe may have been violated.

## Annexure D: South Americas

### CHILE

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte) 800 914 384**

**email** [dra@tip-offs.com](mailto:dra@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English and Spanish 24 hours a day, 7 days a week.

You may also make a report to our **Speak Up Protection Office** by email:

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**email** [speakupprotectionofficer@DRAglobal.com](mailto:speakupprotectionofficer@DRAglobal.com)

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#### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Office, a report can be made to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer; or
- CFO for taxation matters.

Employees may also exercise their right to report concerns or suspected violations through the legal mechanisms available under Chilean laws, as appropriate.

Complaints or issues relating to harassment, sexual harassment or violence in the workplace, and outlined in Law No. 21,643 (Karin Law) may be made in person, or in writing to the Dirección del Trabajo - <https://www.dt.gob.cl/>.

These procedures are available in addition to the reporting channels provided above.

## PERU

You can make a report to the **external independent Speak Up service provider** by calling the toll-free number, sending an email, or filing a report online:

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**Telephone (Deloitte)** 0511 709 7942

**email** [dra@tip-offs.com](mailto:dra@tip-offs.com)

**website** [www@tip-offs.com](http://www@tip-offs.com)

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The service provided by Deloitte is available in English and Spanish 24 hours a day, 7 days a week.

You may also make a report to our **Speak Up Protection Office** by email:

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**email** [speakupprotectionofficer@DRAGlobal.com](mailto:speakupprotectionofficer@DRAGlobal.com)

---

### Other Recipients

Alternatively, if you feel uncomfortable raising the matter with the Speak Up Protection Office, a report can be made to:

- An officer or senior manager of DRA (defined as EXCO or any Director);
- Group Head of Legal;
- Compliance Officer;
- Human Resources Officer; or
- CFO for taxation matters.

Employees may also exercise their right to report concerns or suspected violations through the legal mechanisms available under Peruvian laws, as appropriate.

Complaints or issues (such as issues related to unfair dismissal, working conditions, benefits, harassment etc.) outlined in Legislative Decree No. 728 (the Law of Productivity and Labor Competitiveness) may be submitted to Superintendencia Nacional de Fiscalización Laboral - <https://www.gob.pe/sunafil>).

These procedures are available in addition to the reporting channels provided above.