

## ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities (collectively **ARA Group**) are proud to conduct their businesses with utmost regard for honest and ethical practices. This Anti-Slavery and Human Trafficking Policy (**Policy**) sets out how ARA Group ensures its business dealings and supply chains are ethically compliant with Modern Slavery considerations.

### 1 Application

This Policy applies to all persons working for or otherwise involved with ARA Group in the course of business, including; employees across all levels, directors, managers, officers, agency workers, sub-contractors, external consultants, third-party representatives, and business partners.

### 2 Modern Slavery

- 2.1 **“Modern Slavery”** is an umbrella term referring to the violation of fundamental human rights by way of exploitation of people or deprivation of the liberty of persons for personal or commercial gain. Modern Slavery includes, without limitation; slavery, servitude, forced labour, compulsory labour, and human trafficking.
- 2.2 ARA Group has a zero-tolerance approach towards instances of Modern Slavery and is wholly committed to acting ethically and with integrity in all business dealings and relationships by way of implementing and enforcing effective systems and controls to ensure Modern Slavery is not present within any ARA Group business or any supply chain of ARA Group.
- 2.3 ARA Group is committed to ensuring there is transparency in its business and in its approach to Modern Slavery throughout supply chains consistent with its disclosure obligations under applicable law.
- 2.4 ARA Group expects its contractors, suppliers and other business partners to abide by the same standards and principles. As part of the contracting process, ARA Group includes specific prohibitions against the use of forced, compulsory or trafficked labour, slavery and servitude, whether involves adults or children, and expects that its contractors, suppliers and other business partners to adhere to and hold their own supply chains to the same standards.

### 3 Implementation and responsibility

- 3.1 ARA Group’s Board of Directors and Senior Management team bear responsibility for ensuring this Policy complies with ARA Group’s legal and ethical obligations, and that all persons and entities under ARA Group’s control comply with this Policy.
- 3.2 ARA Group’s Senior Management and Line Managers shall bear the day-to-day responsibility of implementing this Policy, monitoring its use and effectiveness, dealing with any queries about this Policy, and auditing internal control systems and procedures to ensure such systems and procedures are effective in countering Modern Slavery.
- 3.3 ARA Group Management across all levels are responsible for ensuring those reporting to them are aware of, understand, and otherwise comply with this Policy, and are given adequate, regular training on the issue of Modern Slavery in supply chains.
- 3.4 All employees of ARA Group must ensure they have read, understand, and otherwise comply with this Policy.

### 4 Reporting concerns

- 4.1 The prevention, detection, and reporting of Modern Slavery in any part of ARA Group’s business or supply chains is ARA Group’s own responsibility, as is avoiding any conduct or activity which might lead to, or suggest, a breach of this Policy.

- 4.2 ARA Group employees must notify their Line Managers as soon as practicable if they believe or suspect that a breach of this Policy or conflict of this Policy has occurred or may reasonably occur in future. This may also be reported in accordance with ARA Group's Whistleblower Policy.
- 4.3 ARA Group employees are encouraged to raise any concerns about any issue or suspicion of Modern Slavery within ARA Group's business or supply chain with any supplier as soon as possible.
- 4.4 If any ARA Group employee is unsure as to whether a particular act, the treatment of workers generally, or their working conditions within any tier of ARA Group supply chains constitutes any form of Modern Slavery, such employees are encouraged to raise their concerns with their Line Manager as soon as possible.
- 4.5 ARA Group encourages openness and supports any person who raises genuine concerns in good faith under this Policy, even if such concerns are later proven to be mistaken. ARA Group is committed to ensuring that no person suffers any detriment or adverse action as a result of reporting a fairly held suspicion that Modern Slavery may be taking place in any part of its business or in any of its supply chains.

## **5 Communication and awareness**

- 5.1 ARA Group provides training on this Policy, Modern Slavery and the risk ARA Group faces from Modern Slavery from time to time as necessary.
- 5.2 ARA Group's zero tolerance approach to Modern Slavery is communicated to all suppliers, contractors and business partners at the outset of any business relationship and is reinforced as necessary thereafter.

## **6 Breaches of this Policy**

- 6.1 Any ARA Group employee who breaches this Policy will be subject to appropriate disciplinary action as necessary, including but not limited to termination of employment.
- 6.2 ARA Group may terminate its relationship with any individual or organisation it works with if found to have breached this Policy.

## **7 Interaction with other policies**

This Policy is to be read in conjunction with all ARA Group policies, particularly ARA Group's Whistleblower Policy, Employee Grievance Policy, and Corporate Social Responsibility Policy. All those to whom this Policy applies to are encouraged to familiarise themselves with ARA Group's policies. ARA Group employees should raise any queries with their Line Manager or any member of ARA Group's Senior Management team.

## **8 Definitions**

In the interests of ensuring all persons to whom this Policy applies are fully aware of the conduct and activities which fall within Modern Slavery, the following definitions are provided and are deemed by ARA Group to constitute Modern Slavery:

### **(a) Slavery**

- (i) the state or condition of being a slave – a relationship whereby one person has absolute power or dominion over another and controls their life, liberty, and fortune;
- (ii) the subjugation of a person by another person in being forced to work;
- (iii) the condition of being subject to some unwanted influence; or
- (iv) work done in harsh conditions for low or no pay.

**(b) Servitude**

- (i) the state or condition of being a slave; or
- (ii) the state or condition of being subject to or dominated by another person.

**(c) Forced and Compulsory Labour**

- (i) labour done by reason of coercion, threats, or intimidation.

**(d) Human Trafficking**

- (i) the trade of humans (usually coerced or forcefully abducted), most commonly for sexual slavery, servitude, forced labour, or commercial sexual exploitation.

**(e) Child Labour**

- (i) the employment of children in any industry or business that deprives children of childhood, potential, and dignity, and ordinarily involves mentally, physically, socially or morally dangerous or harmful work, especially where such employment is illegal or exploitative.



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Edward Federman  
Chief Executive Officer

12 December 2023

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Date