

MEDIA AND COMMUNICATIONS POLICY

This Media and Communications Policy (**Policy**) sets out how information requested from and disclosed by ARA Group Limited ABN 47 074 886 561 and its related corporate entities (collectively **ARA Group**) is dealt with. This Policy governs how information is to be disseminated in a timely, accurate, comprehensive and authoritative manner.

1 Application

- 1.1 This Policy applies uniformly across ARA Group of entities with respect to all employees, officers, directors and personnel generally (**Employee**).
- 1.2 For the purposes of this Policy, "**Media**" includes all external news media, including electronic and print media and broadcast, publications and communications.

2 Designated spokespersons

- 2.1 When engaging with the Media, information relating to or concerning ARA Group or its Employees is to be given only by ARA Group's externally appointed principal media relations advisers from time to time, and as applicable, ARA Group's General Counsel (**Spokespersons**).
- 2.2 Only the Spokespersons are permitted to publicly disclose ARA Group information or convey or confirm ARA Group's official position with regard to issues of significance or controversial or sensitive situations.
- 2.3 The Spokespersons shall bear the responsibility to:
 - (a) increase public awareness understanding of ARA Group, the services it provides for the community, and its future prospects;
 - (b) promote a positive public image of ARA Group and the work it does with its existing and prospective customers, Employees, contractors, vendors and shareholders.
- 2.4 In certain situations, individual Employees of ARA Group may be asked by a Spokesperson to provide a comment or their expertise on a particular issue by reason of their knowledge, experience or expertise. In such circumstances, the Spokespersons will work with the Employee to prepare them for the communications for which they are to be involved with. Such preparation may include developing talking points as well as counselling, training, and practising for the Media communications.

3 Guidelines for Communications

- 3.1 Where ARA Group or its Employees are contacted by the Media for the purposes of obtaining information about ARA Group, recent unexpected events (i.e. Employee complaints, industrial action, natural disasters) or topical stories within the local community, the guidelines contained in this section 3 are to apply.
- 3.2 All Communications, including enquiries and requests, are to be directed to ARA Group's Spokespersons. In such instances, it is preferred that Employees or ARA Group representatives advise that:

"It is ARA Group's policy to refer all media enquiries to our General Counsel or media relations representatives. You can reach them via..."
- 3.3 In addition to the guideline set out at section 3.2, Employees contacted by the Media should further advise ARA Group's Spokespersons that ARA Group has been approached by the Media.

- 3.4 No ARA Group Employee is to engage in any communication with the Media regarding ARA Group unless the Spokespersons or ARA Group's Managing Director have expressly authorised such engagements, or where such Employee has been asked by the Spokespersons to provide their comments. Further, Employees must refrain from answering any questions compelled by Media representatives in any attempt to quickly obtain information.
- 3.5 The ordinary degree of courtesy and professionalism which ARA Group expects its Employees to apply when engaging with existing and prospective customers should be similarly displayed towards the Media.
- 3.6 Media enquiries are to be referred to the Spokespersons or otherwise responded to, as applicable, in a quick, courteous and professional manner.

4 Guidelines for seeking media coverage

- 4.1 Where an Employee reasonably believes that ARA Group has a positive news story to share with the public, the Spokespersons should first be consulted. Only the Spokespersons are authorised to distribute ARA Group news releases, pitch coverage of particular events, or hold news conferences.
- 4.2 Employees are not permitted to directly contact the Media without first consulting the Spokespersons.
- 4.3 The Spokespersons will work with Employees to gather information to determine if and how the Media should be contacted.
- 4.4 Certain information or communications may be referred to the ARA Group blog in lieu of the Media for formal publication.



Edward Federman
Chief Executive Officer

12 December 2023

Date