

BULLYING AND HARASSMENT POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australian and New Zealand (collectively **ARA Group**) are committed to providing and maintaining a positive Workplace in which employees feel safe and secure. This Bullying and Harassment Policy (**Policy**) forms part of ARA Group's resources in place to ensure its commitment to a safe and positive Workplace is met and its obligations under Anti-Discrimination Legislation and Workplace Legislation are fulfilled.

1 General

1.1 Application

This Policy applies to all ARA Group's:

- (a) employees, including those who work on a full-time, part-time, casual or temporary basis; and
- (b) employees at work, work-related events or company functions, or other activities happening outside of work.

1.2 Definitions

"Anti-Discrimination Legislation" means the laws dealing with discrimination and harassment, including but not limited to:

- (a) *Workplace Gender Equality Act 2012 (Cth)*;
- (b) *Fair Work Act 2009 (Cth)*;
- (c) *Age Discrimination Act 2004 (Cth)*;
- (d) *Disability Discrimination Act 1992 (Cth)*;
- (e) *Racial Discrimination Act 1975 (Cth)*;
- (f) *Sex Discrimination Act 1984 (Cth)*;
- (g) *Employment Relations Act 2000 (NZ)*;
- (h) *New Zealand Bill of Rights Act 1990 (NZ)*; and
- (i) *Human Rights Act 1993 (NZ)*.

"Bullying" means unreasonable repeated behaviour by a person or group of people towards another worker, which creates a risk to health and safety, as defined by section 789FD of the *Fair Work Act 2009 (Cth)*.

"Employee Grievance Policy" means the ARA Group policy of identical name.

"Sex-based harassment and discrimination" means unwelcome conduct of a seriously demeaning nature by reason of the person's sex in circumstances in which a reasonable person would have anticipated that the person harassed would be offended, humiliated or intimidated.

"Sexual Harassment Policy" means the ARA Group policy of identical name.

"Workplace" includes:

- (a) the place of work of a person accused of Bullying and/or harassment;
- (b) the place of work of a person alleging Bullying and/or harassment;
- (c) the location of someone working remotely;
- (d) work-related trips, including but not limited to training events, conferences etc; and
- (e) work-related social events, including but not limited to office parties, work lunches etc.

"Workplace Harassment" means unwelcome or unsolicited behaviour or conduct which a person is subjected to in the Workplace (other than Workplace Sexual Harassment) by a person or group of people that has the general effect of or is reasonably likely to be offensive, humiliating, intimidating and/or threatening.

“Workplace Legislation” means the laws dealing with employment and Workplace matters, including but not limited to the *Fair Work Act 2009* (Cth) and the *Work Health and Safety Act 2011* (Cth) in Australia, and *Employment Relations Act 2000* (NZ) and *Health and Safety at Work Act 2015* (NZ) in New Zealand.

“Workplace Sexual Harassment” refers to unwelcome conduct of a sexual nature in the Workplace, which a reasonable person would anticipate as being possibly offensive, humiliating and/or intimidating, as defined by section 28A of the *Sex Discrimination Act 1984* (Cth). This includes but is not limited to; physical conduct, verbal comments, jokes, propositions and innuendos, the display of offensive material, staring and leering, indecent exposure, invasive questions about a person’s private life or body, sexually explicit emails, messages or images, and unnecessary familiarity.

1.3 Compliance

All persons to whom this Policy applies are responsible for familiarising themselves with this Policy and must at all times comply with this Policy.

2 Employee training

All new employees of ARA Group will be required to familiarise themselves with this Policy, the Sexual Harassment Policy and undertake ARA Group’s Sexual Harassment Compliance Training Module as part of the employee onboarding process.

Employees may access a variety of educational materials and resources pertaining to Bullying, Workplace Harassment and Workplace Sexual Harassment via the ARA Group Legal webpage at any time. From time to time, additional educational training may be required to be completed by persons subject to this Policy, including both new and existing Employees.

3 No tolerance policy

ARA Group believes that all Employees should be able to work in an environment free of Bullying and harassment. Bullying, Workplace Harassment and Workplace Sexual Harassment are totally unacceptable in any and all ARA Group Workplaces and will not be tolerated under any circumstances whatsoever.

4 Conduct prohibited in the Workplace

4.1 Bullying and harassment generally

Bullying and harassment of any kind is prohibited within the Workplace of any employee of ARA Group and its subsidiaries, including but not limited to on race, colour, national, ethnic origin, age, disability, sex as outlined at sections 4.2 to 4.5 of this Policy.

4.2 Harassment based on race, colour, national, ethnic origin

Section 18C of the *Racial Discrimination Act 1975* (Cth) (**Racial Discrimination Act**) prohibits offensive, insulting, humiliating or intimidating behaviour based on race, colour, national or ethnic origin.

Harassment based on any attribute protected by the *Racial Discrimination Act 1975* (Cth) is strictly prohibited within the Workplace of any person to whom this Policy applies.

4.3 Harassment based on age

Age based harassment is strictly prohibited within the Workplace of any person to whom this Policy applies in accordance with the *Age Discrimination Act 2004* (Cth).

4.4 Harassment based on disability

Section 35 of the *Disability Discrimination Act 1992* (Cth) (**Discrimination Act**) prohibits harassment in relation to the disability of any person in the Workplace.

Pursuant to the *Disability Discrimination Act 1992* (Cth), disability-based harassment is strictly prohibited within the Workplace of any person to whom this Policy applies.

4.5 Sex-based harassment and discrimination

Sex-based harassment is prohibited in accordance with the *Sex Discrimination Act 1984* (Cth).

4.6 Sexual harassment

Workplace Sexual Harassment is prohibited in accordance with the Sexual Harassment Policy and the *Sex Discrimination Act 1984* (Cth).

5 Reasonable performance management

Reasonable performance management and disciplinary action is not considered to be harassment or bullying for the purposes of the law.

6 Complaints

All complaints concerning alleged breaches of this Policy must be made in accordance with ARA Group's Employee Grievance Policy.

Notwithstanding the above, at any time, Employees may also choose to take a complaint of discrimination or harassment to the following organisations amongst others:

Fair Work Commission (Cth) Phone: 1300 799 675 Website: www.fwc.gov.au	Employment Relations Authority (NZ) Phone: 09 970 1550 Website: www.era.govt.nz
Anti-Discrimination Board (NSW) Phone: 1800 670 812 Website: www.antidiscrimination.nsw.gov.au	Queensland Human Rights Commission (QLD) Phone: 1300 130 670 Website: www.qhrc.qld.gov.au
Equal Opportunity and Human Rights Commission (VIC) Phone: 1300 292 153 Website: www.humanrights.vic.gov.au	Office of the Anti-Discrimination Commissioner (TAS) Phone: 1300 305 062 Website: www.antidiscrimination.tas.gov.au
Equal Opportunity SA (SA) Phone: 1800 188 163 Website: www.eoc.sa.gov.au	Equal Opportunity Commission (WA) Phone: 08 9216 3900 Website: www.equalopportunity.sa.gov.au
ACT Human Rights Commission (ACT) Phone: 02 6205 2222 Website: www.hrc.act.gov.au	Northern Territory Anti-Discrimination Commission (NT) Phone: 1800 813 846 Website: www.adc.nt.gov.au
Australian Human Rights Commission (Cth) Phone: 1300 656 419 Website: www.humanrights.gov.au	NZ Human Rights Commission (Te Kāhui Tika Tangata) Phone: 0800 496 877 Website: www.tikatangata.org.nz

7 New Zealand Legislation

The provisions contained in this Policy apply equally to ARA Group Employees based in New Zealand and are intended to be interpreted and applied with due regard to the applicable Anti-Discrimination Legislation, which, for the avoidance of doubt, includes the *New Zealand Bill of Rights Act 1990* (NZ) and the *Human Rights Act 1993* (NZ).

8 Disciplinary action

A breach of any part of this Policy may result in disciplinary action subject to ARA Group's Employee Grievance Policy, including but not limited to suspension or termination of employment.



Edward Federman
Chief Executive Officer

21 January 2026

Date