

CORPORATE SOCIAL RESPONSIBILITY 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 operating in a responsible and sustainable manner and to integrating its corporate social and environmental responsibilities within business activities, and balancing the commercial and economic interests of business activities with the social and environmental implications that may flow from such decisions, particularly with regard to ARA Group employees, shareholders, suppliers, and the greater community.

This Corporate Social Responsibility Policy (**Policy**), which is adopted by the Board of Directors of ARA Group, sets out how ARA Group implements and will fulfil its commitment to understanding, monitoring and managing the social, environmental and economic impacts of its decisions within all of its business activities.

1 Ethics

ARA Group is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in daily operations and commercial dealings. ARA Group will at all times conduct its business in an open, honest and ethical manner.

ARA Group expects all directors and employees in every jurisdiction to ensure the principles by which govern ARA Group's behaviour and commercial dealings are of high standard. In doing so, ARA Group:

- (a) carries out all business activities in accordance with all of the applicable laws, rules and regulations of the jurisdiction in which our businesses are located;
- (b) conducts business activities with high ethical standards and in accordance with ARA Group Code of Conduct Policy;
- (c) engages in dealings and transactions in a fair and reasonable manner;
- (d) adheres to a "zero tolerance" to any form of discrimination, harassment or sexual harassment as outlined in the ARA Group's Equal Employment Opportunity and Anti-Discrimination Policy, Bullying and Harassment Policy and Sexual Harassment Policy;
- (e) adheres to the ARA Group Anti-Bribery and Corruption Policy as any form of corrupt or bribery practices are unacceptable;
- (f) ensures there is no actual, potential or perceived conflict of interest in any business dealings and ensure any actual, potential or perceived conflict of interest is identified, disclosed and managed as outlined in the ARA Group Conflict of Interest Policy; and
- (g) remains vigilant and encourages disclosure of any serious concerns about improper conduct within ARA Group's operation. In making disclosure of any serious concerns about improper conduct, it must be done in accordance with the ARA Group Whistleblower Policy.

Despite not being a listed company on the Australian Stock Exchange, ARA Group proudly adheres to the Australian Securities Exchange Corporate Council's Principles and Best Practice Recommendations.

2 People

ARA Group strongly believes that it is only as good as the people it engages and employs. Accordingly, ARA Group aims to find and keep the highest calibre of employees and encourages their personal development and provides ongoing learning and development opportunities to employees to allow them to achieve their full potential. To the extent possible, ARA Group endeavours to maximise opportunity for internal promotion amongst employees.

Equal opportunity is provided to all existing and prospective employees in accordance with ARA Group's Equal Employment Opportunity and Anti-Discrimination Policy.

3 Modern Slavery

ARA Group endeavours to maintain long term relationships with preferred contractors. During the tenure of such relationships, the performance of contractors is regularly monitored and reviewed to ensure performance standards are met.

In building and maintaining ethical, long-term relationships based on trust, continuous effort, and mutual improvement, ARA Group continuously works with existing suppliers to:

- (a) identify, mitigate, eliminate and/or manage any risk relating to any internationally recognised exploitative practices including exploitation of children or any other person in Australia or elsewhere, human trafficking, slavery, slavery-like practices, servitude, forced labour, forced marriage, debt bondage, the worst forms of child labour, deceptive recruiting for labour services (**Modern Slavery**); and
- (b) comply with any law, rule or other legally binding measure of any jurisdiction that creates a reporting or due diligence obligation in connection with human rights and Modern Slavery laws and regulations (**Modern Slavery Law**).

4 Human rights and fair trade

ARA Group at all times seeks to undertake its business ethically, economically, and in accordance with good environmental practices. As such, it has adopted from the “Ten Principles of the UN Global Compact” a set of principles with the primary objective to: achieve positive social outcomes within its supply chain; identify, mitigate, eliminate and/or manage risks particularly in the context of human rights, and fair trade; and promote corporate social responsibility activities with its suppliers, as follows:

Principle 1: Supporting and respecting protection of human rights

To respect internationally proclaimed human rights, ARA Group undertakes due diligence to avoid infringing human rights and encourages its suppliers to follow suit, as governed by ARA Group’s Anti-Slavery and Human Trafficking Policy, and ARA Group’s Procurement Policy.

Principle 2: Avoiding complicity in human rights abuses

As noted above, ARA Group takes measures to avoid infringing human rights, including avoiding complicity in such infringements. To meet this principle, ARA Group complies with the reporting requirements of the *Modern Slavery Act 2018* (Cth) (the “Act”).

Principle 3: Freedom of association and right to collective bargaining

ARA Group respects the right of all employers and workers to freely and voluntarily establish groups for the promotion and defence of their occupational interests. ARA Group cooperates with Employees on employee-related matters and otherwise empowers its employees to make free decisions without violence, pressure, fear or threats.

Principle 4: Elimination of forced and compulsory labour

ARA Group employs its staff in accordance with applicable employment laws to ensure all employment arrangements are lawfully compliant and freely entered into by employees on their own volition. Further, in accordance with the Act, ARA Group does not support nor condones forced or compulsory labour and endeavours to avoid such in accordance with ARA Group’s Anti-Slavery and Human Trafficking Policy, and ARA Group’s Procurement Policy.

Principle 5: Abolition of child labour

As noted above, ARA Group adheres to applicable employment laws when engaging staff and expects its suppliers to similarly uphold and adhere to expectations regarding employment and human rights to avoid child labour.

Principle 6: Elimination of discrimination

ARA Group is proud to be an employer of a diverse workforce. ARA Group endeavours to uphold the elimination of discrimination within its workplaces (and in the course of business) by way of implementing and maintaining a Bullying and Harassment Policy, and an Equal Employment Opportunity and Anti-Discrimination Policy encouraging equal opportunity and prohibiting discrimination.

Principle 7: Precautionary approach to environmental challenges

ARA Group is committed to protecting the environment and taking reasonable steps to minimise its contribution to environmental challenges. ARA Group implements and maintains an Environmental Policy, and a Resource Management Policy setting out the measures in place to facilitate such.

Principle 8: Promote greater environmental responsibility

As noted above, ARA Group's Environmental Policy, and ARA Group's Resource Management Policy stipulates the measures taken by ARA Group, and the responsibilities accepted by ARA Group in the interests of being environmentally responsible.

Principle 9: Development of environmentally friendly technologies

Where possible, ARA Group endeavours to implement technologies which are beneficial for the environment and otherwise reduce resource usage and minimise resource wastage.

Principle 10: Working against corruption, extortion and bribery

ARA Group has zero tolerance for corruption, extortion and bribery within its workplace and operations and takes measures to ensure its practices are ethical, fair, and transparent. As governed by ARA Group's Anti-Bribery and Corruption Policy, ARA Group strives to, amongst other things, ensure its records are transparent, and that all transactions are conducted in good faith.

5 Suppliers

ARA Group evaluates all of its supplier candidates fairly, sincerely, and in good faith in offering reasonable opportunities. ARA Group selects suppliers comprehensively based on criteria such as:

- (a) credibility;
- (b) technology;
- (c) quality, price and delivery of goods and services procured; and
- (d) engagement with corporate social responsibility.

ARA Group further encourages existing and potential suppliers to collaborate with ARA Group to drive best practice and continuous improvement.

6 Health and Safety

ARA Group acknowledges and understands the importance of ideally eliminating but certainly minimising the risk of injury in the workplace and otherwise providing its employees, contractors and the general public affected by its dealings with a safe and healthy environment.

ARA Group works to promote a culture where personal responsibility for safety and health is second nature to employees and has a number of policies applicable to health and safety which governs how risks are to be managed and dealt with. Employees are encouraged to report any potential injury risks or hazards, and appropriate measures are in place within ARA Group to respond to risk.

7 Environment

ARA Group is committed to minimising the impact of its business activities on the environment. ARA Group's Board of Directors are accountable for the overall environmental compliance and performance of ARA Group and is responsible for providing guidance and necessary resources and support to the business to ensure activities and dealings are undertaken in a manner that effectively manages potential environmental risks.

ARA Group's business managers are responsible for implementing and adhering to all ARA Group environmental policies and guidelines and are entrusted to proactively address any issues that may adversely affect the environment or the ARA Group's environmental performance. This includes assessing likely environmental outcomes prior to decision making, and ensuring factors such as safety, quality, cost, and time are considered when adjusting decisions/dealings to reduce possible environmental impacts.

8 Community involvement

ARA Group has its own established charitable foundation, the ARA Endowment Fund, which was created as a mechanism for the ARA Group and its employees to collectively give back to the community. Since its establishment, ARA Group's Endowment Fund has supported numerous registered charities and provided support to those in need. This is a proud achievement of ARA Group and its employees.

9 Aboriginal and Torres Strait Islander involvement

ARA Group regularly seeks business from suppliers which are Aboriginal and Torres Strait Islander owned, managed and controlled (**Indigenous Enterprises**). Engaging in business with the Indigenous Enterprises generates value within the ARA Group's supply chain, increases opportunities for suppliers who have traditionally been under-represented within the community, and assists in meeting the goals and requirements set by the Australian Government.

ARA Group and its affiliate, ARA Indigenous Services Pty Limited ABN 83 605 947 822, are members of Supply Nation, giving both entities access to Indigenous Enterprises that are currently part of the Supply Nation network which is used to source Indigenous Enterprises for future business transactions.

10 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 corresponding laws and regulation in New Zealand.



Edward Federman
Chief Executive Officer

21 January 2026

Date