

DRUG, ALCOHOL AND SMOKING 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 ensuring a safe and healthy workplace in accordance with applicable workplace health and safety legislation. This Drug, Alcohol and Smoking Policy (**Policy**) set out ARA Group's position regarding use and consumption of drugs, alcohol and smoking generally (including vaping and the use of electronic cigarettes, known as **e-cigarettes**), in the interests of maintaining a workplace that is free of risk, and otherwise safe and healthy for all.

1 Application

This Policy applies to all employees, officers, personnel and directors of ARA Group, regardless of whether employment is on a permanent or temporary, casual, full-time or part-time basis (collectively **Employees**).

2 Prohibition of drugs and alcohol

- 2.1 Illicit drugs and alcohol are not permitted to be used or consumed by Employees during the course of their employment, including when performing duties, operating machineries or representing ARA Group.
- 2.2 Employees are not to report to work if they are under the influence of illicit drugs or alcohol.
- 2.3 Employees are strictly prohibited from using ARA Group machinery, equipment or vehicles whilst under the influence of illicit drugs or alcohol. For the avoidance of doubt, this prohibition applies outside of normal working hours where Employees have access to ARA Group machinery, equipment or vehicles.
- 2.4 Illicit drugs and alcohol are not to be used or consumed during Employee meal breaks or rest breaks, regardless of whether these breaks are taken on premises at workplace locations, or at external venues such as cafes and restaurants.

3 Random testing

- 3.1 Employees may be subjected to random drug and alcohol testing, including for the purposes of satisfying ARA Group, a client of ARA Group or a third party with whom it engages in business with, that its Employees associated with a specific project or contract have not used or consumed illicit drugs or alcohol.
- 3.2 Should an Employee fail to satisfy a random drug and alcohol test, appropriate action will be taken in accordance with applicable project or contractual requirements.
- 3.3 ARA Group appreciates and respects the bodily autonomy of its Employees. Notwithstanding this, ARA Group discourages illicit drug use and excessive consumption of alcohol outside of the workplace. Where Employees are subjected to random drug and alcohol testing in accordance with paragraph 3.2 of this Policy, even when an Employee has not used or consumed illicit drugs or alcohol immediately preceding testing, traces of drugs and alcohol may be present, in which instance, appropriate action will nonetheless be taken as directed by this Policy.

4 Prescription medication

- 4.1 ARA Group acknowledges that from time-to-time Employees may be prescribed medications by licensed medical practitioners which may be in the form of controlled substances, or may cause side effects, such as drowsiness, which compromise the ability of an Employee to fulfil their duties or otherwise pose a risk to the safety of the Employee in question and those around them.
- 4.2 Where such medications are prescribed, Employees must as soon as reasonably practicable notify their supervisors or managers, as applicable, of such medical prescriptions so as to enable to special precautions to be taken to ensure the safety of the Employee and others in the workplace.

5 Removal from the workplace

Further to paragraph 2.2 above, if there is reasonable suspicion that an Employee is under the influence of drugs or alcohol in the workplace, ARA Group reserves its rights to remove the Employee from the workplace, in which instance safe transportation will be arranged to enable the Employee to return to their place of residence safely. For the avoidance of doubt, this paragraph 5 does not apply to use of prescription medication of which ARA Group is aware of in accordance with paragraph 4 above.

6 Addiction

Where ARA Group becomes aware of an Employee's addiction to illicit drugs or alcohol, it will endeavour to assist any such Employee in resolving their addiction, including but not limited to referral to support groups or professional guidance.

7 Prohibition of smoking

Smoking, including the use of e-cigarettes, is strictly prohibited in all ARA Group workplaces, including but not limited to:

- (a) within a five (5) metre radius of the entry and exit of ARA Group offices, warehouses and workshop areas, and internally within such areas;
- (b) in and within the immediate proximity of ARA Group vehicles;
- (c) within a five (5) metre radius of ARA Group machinery and equipment; and
- (d) within all supplied accommodation, rest areas and lunchrooms, and amenity facilities.

8 Disciplinary action

Repeated instances of the behaviour outlined above in paragraph 5, or disregard for this Policy generally, may result in disciplinary action as appropriate, including but not limited to suspension or termination of employment.

9 Additional measures

From time-to-time ARA Group may be contractually bound to implement additional measures pertaining to illicit drugs, alcohol and smoking in relation to workplace health and safety. Accordingly, to the extent of any such contractual obligations upon ARA Group, additional measures and processes may apply to applicable Employees with respect to illicit drugs, alcohol and smoking.



Edward Federman
Chief Executive Officer

21 January 2026

Date