

EMPLOYEE GRIEVANCE POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) are committed to ensuring a positive, harmonious and safe workplace. This Employee Grievance Policy (**Policy**) sets out the manner in which work-related disputes and grievances are to be dealt with so as to ensure procedural fairness, effective dispute handling, and the equitable resolution of such matters.

1 Application

This Policy applies to all full-time, part-time, casual or temporary employees, officers, personnel and directors of ARA Group (**Employees**).

2 Compliance

All ARA Group personnel in a managerial or supervisory role (including roles which are similar) are responsible for familiarising themselves with this Policy and must ensure it is complied with.

3 Principles of fairness and justice

Employee grievances and disputes will be handled in accordance with natural justice, free of bias, and in a timely manner that is procedurally fair for all parties involved.

4 Principle of confidentiality

All Employee grievances and disputes will be handled confidentially and persons handling such matters will not disclose all or any part of a grievance with persons other than the parties involved, except where necessary to preserve ARA Group's best interests (including without limitation, disclosure to ARA Group's Legal Department or external legal representatives) and as required by law. Persons involved in workplace grievances are expected to observe this principle of confidentiality.

5 Protection from victimisation

Under no circumstances shall any Employee who raises a grievance in good faith or is otherwise associated with a grievance be subject to victimisation.

6 Procedure

6.1 Commencement

At any time, an Employee may bring to the attention of their manager or supervisor (**Responsible Person**) a workplace grievance they wish to have resolved (**Complainant**). If the workplace grievance involves the Responsible Person, an Employee may take the complaint to a more senior member of management. All grievances should be lodged in writing to the Responsible Person.

Where a Responsible Person reasonably suspects that a person under their supervision or control is involved in a workplace grievance which may cause detriment if unresolved, the Responsible Person must bring the matter to the applicable person's attention and confirm whether they wish to have the matter handled in accordance with this Policy.

ARA Group encourages all persons affected by workplace grievances to address such grievances in accordance with this Policy, as soon as is practicable after the grievance occurs.

6.2 Investigation and fact finding

If in the circumstances it is appropriate and/or necessary, the Responsible Person (or other senior management personnel) may undertake an investigation and conduct fact-finding exercises to obtain all information pertaining to the grievance for the purposes of resolving the matter.

During the investigation or fact-finding exercise, it may be necessary to interview witnesses.

Where multiple persons or parties are involved in a workplace grievance (**Respondent(s)**), an opportunity must be afforded to each Respondent(s) to express their version of events and any other information they wish to put forward as relevant.

6.3 Resolution processes

Wherever possible, grievances are to be addressed by a process of discussion, co-operation and conciliation with the assistance of the Responsible Person.

The Complainant and Respondent(s) are to participate in the appropriate grievance resolution process in good faith and aim to reach an acceptable outcome that minimises any potential detriment to ongoing relationships.

Grievances are usually only considered resolved when all parties agree, when the cause of the grievance has been removed or resolved, or when arrangements have been made, if appropriate, to repair and make good any damage and distress suffered by the complainant. However, agreement by itself is not the criterion for a satisfactory resolution to a grievance.

An Employee may withdraw a complaint at any time, however any such withdrawal should be done in writing to the Responsible Person.

6.4 Appeals processes

If an Employee thinks that the grievance procedure was not followed properly, an Employee may appeal to the Managing Director of their applicable ARA Group entity or where the Managing Director is the Responsible Person (for the purposes of clause 6.1), the ARA Group General Counsel. The Managing Director or ARA Group General Counsel (as applicable) will then assess the way in which the complaint was handled. No further action will be taken if the Managing Director (or ARA Group General Counsel) decides that the complaint has been handled properly. If the Managing Director (or ARA Group General Counsel) decides that the complaint was not handled properly, they will organise for the complaint to be looked at again.

Any such further review will be carried out by someone other than the Responsible Person (or other senior management personnel) who first handled the complaint. If the Employee thinks that the complaint has not been handled correctly, the Employee may then contact an external agency, as outlined under clause 8.3 of this Policy.

6.5 Documentation

Any written record regarding a grievance will be kept confidential during the process of resolution. Records of resolution of grievances will be maintained by ARA Group, but not in Employee personal files unless a disciplinary charge has been proved.

7 Informal resolution of grievances

Notwithstanding the above, nothing in this Policy operates to prevent the informal resolution of a grievance where the grievance is capable of being resolved informally in the circumstances.

8 Bullying, Discrimination and Harassment Disputes

8.1 Reportable grievances

All grievances which are concerned with or relate to ARA Group's Equal Employment Opportunity and Anti-Discrimination Policy, ARA Group's Bullying and Harassment Policy or ARA Group's Sexual Harassment Policy, including any alleged breach of either or all policies are for the purposes of this Policy known as "**Reportable Grievances**".

Reportable Grievances must be reported to ARA Group's Legal Department by the Responsible Person as soon as is practicable after a complaint is raised.

Thereafter, the Reportable Grievance will be handled by the Responsible Person under the guidance of the ARA Group's Legal Department.

9 Written records

All steps taken to handle and resolve a Reportable Grievance, including any relevant information concerning the Reportable Grievance, must be recorded in written form.

10 External complaints

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

11 Disciplinary action

If necessitated by the circumstances, appropriate disciplinary action may be taken against a party to a grievance, including but not limited to suspension or termination of employment, particularly where a Reportable Grievance is concerned.

12 Good faith

All grievances raised must be done so in good faith and are not to be frivolous, vexatious, malicious or designed to avoid performance management processes.

Any person found to have knowingly provided false and misleading information or knowingly made false allegations without any substance may be subject to separate disciplinary action.



Edward Federman
Chief Executive Officer

21 January 2026

Date