

EQUAL EMPLOYMENT OPPORTUNITY AND ANTI-DISCRIMINATION POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) are dedicated to promoting Workplace diversity and ensuring equal access to employment for all. This Equal Employment Opportunity and Anti-Discrimination Policy (**Policy**) mandate the measures ARA Group has in place for the Workplace to meet its obligations under Anti-Discrimination Legislation.

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;
- (b) employees at work, work-related events or company functions, or other activities happening outside of work;
- (c) all employment processes within ARA Group, including hiring, training and dismissing employees.

1.2 Definitions

"Affirmative Action" is an umbrella term for a wide range of programmes designed to ensure that appropriate action is taken to eliminate discrimination and to promote equal opportunities for those in minority or disadvantage groups, including women.

"Anti-Discrimination Legislation" means the laws providing for people to be considered equally for employment and generally not discriminated against, including:

- (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).

"Equal Employment Opportunity" means that everyone has fair and equitable access to jobs, employment conditions, training, and promotion opportunities consistent with the principles of merit, to ensure that the best applicant is chosen at all times.

"Discrimination" refers to:

- (a) where someone is treated adversely because of a Protected Attribute they have (**Direct Discrimination**); and
- (b) where there is a requirement that is the same for everyone but has an adverse effect on someone due to a Protected Attribute they have (**Indirect Discrimination**).

"Discriminatory" has the same meaning as Discrimination.

"Protected Attribute" means any characteristic or attribute of a person that is protected by Anti-Discrimination Legislation, including but not limited to age, sex, race, colour, sexual orientation or preference, marital status, physical or mental disability, family or carer's responsibilities, pregnancy, religion, political opinion, social origin or national extraction.

"Workplace" includes:

- (a) the place of work of an Employee accused of bullying and/or harassment;
- (b) the place of work of an Employee alleging to be the victim of 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.

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 Responsibility to base employment decisions on merit

All employment opportunities and conditions, training, and promotion opportunities must be made available to all persons on an Equal Employment Opportunity basis, without bias towards or undue regard to any Protected Attribute(s) any person may have.

3 Responsibility to make fair and equitable dismissal decisions

The dismissal of any Employee must be made fairly and equitably in accordance with applicable employment laws, without regard to any Protected Attribute(s) the Employee being dismissed may have or exhibit.

4 Prohibition of Discrimination

All Employees are prohibited from undertaking, partaking in or contributing to conduct of any kind that is Discriminatory against or toward any other Employee, and acknowledges that they may be subject to disciplinary action for such conduct.

5 Affirmative Action not Discriminatory

All persons bound by this Policy acknowledge that any Affirmative Action programmes in place or instituted by ARA Group, its directors, agents, representatives and Employees are not Discriminatory against persons who are not encapsulated by such programmes, to the extent that Affirmative Action programmes are conducted in accordance with Anti-Discrimination Legislation.

6 Special measures or adjustments

Notwithstanding the above, in the course of any dealings in the Workplace, special measures or adjustments may reasonably be made to accommodate the Protected Attribute(s) of any person for their benefit provided that such Protected Attribute(s) is made known to management personnel to whom the person reports to, and the person with the Protected Attribute(s) agrees to the proposed special measures or adjustments.

7 Employee training

All new Employees of ARA Group are required to familiarise themselves with this Policy as part of the induction process.

From time to time as applicable, additional training may be required to be undertaken and completed by persons subject to this Policy, within ordinary working hours, for the purposes of educating Employees on behavioural and conduct standards and/or to fulfil ARA Group's obligations under Anti-Discrimination Legislation.

8 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).

9 Complaints

Any person who may wish to make a complaint regarding an alleged breach of this Policy may do so in accordance with ARA Group's Employee Grievance Policy.

10 Disciplinary action

All persons subject to this Policy acknowledge that a breach of any part of this Policy may result in disciplinary action subject to the Employee Grievance Policy, including but not limited to suspension or termination of employment.



Edward Federman
Chief Executive Officer

21 January 2026

Date