

EXTERNAL SOFTWARE POLICY

In undertaking its business activities, ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) rely upon third party external software (**External Software**) from time to time. This External Software Policy (**Policy**) sets out how ARA Group uses External Software so as to respect and comply with applicable software licensing agreements and copyright laws.

For the avoidance of doubt, this Policy applies to all employees, officers, personnel and directors of ARA Group (**Employees**).

1 Ownership

- 1.1 ARA Group's Information Technology Department (**IT Department**) shall be responsible for procuring all External Software purchased and owned by or licensed to ARA Group and installing External Software on technological devices of Employees as appropriate.
- 1.2 Where External Software is purchased or licensed to an Employee directly, the installation and use of such External Software shall be the responsibility of the individual who purchased or was licensed the External Software.
- 1.3 Notwithstanding section 1.2 above, External Software is not to be installed on ARA Group technological devices without the authorisation of the IT Department.
- 1.4 ARA Group managers and supervisors are responsible for ensuring that the External Software used by their respective businesses and Employees is properly purchased or licensed from the applicable third-party supplier.
- 1.5 License keys, installation codes, and other applicable installation credentials shall be obtained only from legitimate sources and are not to be shared, except by authorised Employees acting within the scope of their employment with ARA Group.

2 Distribution

- 2.1 Prior to copying or distributing any External Software, all reasonable steps must be taken to ensure that ARA Group is permitted to copy or distribute the External Software concerned.
- 2.2 Further to section 2.1 above, under no circumstance whatsoever is any Employee to copy, adapt, modify, alter, distribute or otherwise do anything with any External Software where such permissions have not been granted to ARA Group.
- 2.3 Where ARA Group is permitted to copy or distribute External Software, copying or distribution must be conducted in compliance with the applicable license or agreement governing the purchase or license of External Software.
- 2.4 All copied External Software must carry a complete copy of the software license documentation, as applicable.
- 2.5 Copies of External Software purchased by or licensed to ARA Group remain the property of ARA Group. Similarly, copies of External Software purchased or licensed by Employees shall remain the property of such Employee.

3 Redundant or obsolete software

External Software (and versions of such) which is obsolete or redundant by reason of upgrades available are not to be used after such upgrade has been affected by the IT Department, except as may otherwise be permitted under the applicable software license.

4 Acceptable Use of Information Technology Policy

External Software is to be dealt with in accordance with ARA Group's various policies, including but not limited to ARA Group's Acceptable Use of Information Technology Policy. External Software obtained or used in a manner contrary to such policies must be immediately deleted from any technological devices of ARA Group and its Employees.

5 Use of External AILM

External artificial intelligence language model (**AILM**) tools, platforms, or applications must be used strictly in accordance with ARA Group’s various policies, including but not limited to ARA Group’s Acceptable Use of Artificial Intelligence Policy. Any external AILM used or accessed in a manner contrary to such policies must be immediately discontinued and deleted from any ARA Group technological devices, systems, or accounts.

6 Disciplinary action

Non-compliance with this Policy may result in disciplinary action as appropriate, including but not limited to suspension or termination of employment with ARA Group, and civil and/or criminal penalties enforced by the External Software owner, dependent on the circumstances. For the avoidance of doubt, unauthorised possession and/or distribution of External Software is a violation of this Policy.



Edward Federman
Chief Executive Officer

21 January 2026

Date