

FATIGUE MANAGEMENT POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) recognise that fatigue can increase the risk of workplace accidents. In the interests of reducing risks which may compromise the safety of workers, in addition to ARA Group's Work Health and Safety Policy, this Fatigue Management Policy (**Policy**) sets out the measures adopted by ARA Group to reduce such risks and preserve the health and safety of workers.

1 General

- 1.1 This Policy applies to all employees of ARA Group and its subsidiaries, including those who work on a full-time, part-time, casual or temporary basis, whose roles and/or duties in the course of employment are of such a nature that the risk of workplace accidents or incidents generally are recognised as being increased by fatigue (**Employees**).
- 1.2 The duties and work types captured by subsection 1.1 includes, but is not limited to; handling heavy or potentially hazardous or toxic items and substances, the operation and use of a vehicle, scaling buildings or working at height of any kind, loading, transporting or handling ammunition or firearms, the operation and use of machinery, plant equipment or tools of any kind, and working night shifts and shift work generally.

2 Risk assessments

- 2.1 Prior to any Employee commencing work where the risk of injury related to fatigue is recognised, project managers and/or supervisors with responsibility for such work shall conduct risk assessments as appropriate to identify the potential risks involved in such work and implement necessary control measures to reduce the levels of such risks.
- 2.2 In circumstances described above at subsection 2.1, Employees and their managers and/or supervisors must discuss strategies implemented to minimise the risk of fatigue related incidents prior to undertaking such work and must at all times comply with strategies implemented.
- 2.3 Risk assessments must be undertaken at the time any Employee reaches twelve (12) hours of continuous work (inclusive of rest breaks), in addition to any risk assessments conducted at any time during such shift.

3 Fatigue management measures

To minimise the risk of fatigue related incidents, the following measures shall apply in respect of persons covered by this Policy:

- (a) Employees will not work more than five (5) hours without a prescribed rest break;
- (b) Employees working more than twelve (12) hours in any continuous period may not commence a subsequent shift without a ten (10) hour rest break between shifts;
- (c) driving for periods in excess of two (2) hours will require a prescribed rest break of a minimum of ten (10) minutes per two (2) hour increments; and
- (d) Employees may be consulted and involved in determining any significant changes to their shift roster and how such changes are to be implemented.



Edward Federman
Chief Executive Officer

21 January 2026

Date