

WORK HEALTH AND SAFETY 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 providing a safe and healthy workplace for workers and others who may be reasonably affected by ARA Group's work. This Work Health and Safety Policy (**Policy**) set out ARA Group's objective in preventing work-related injuries and illnesses and its responsibilities in compliance with its obligations at law regarding workplace health and safety.

1 Application

This Policy applies to all employees, officers and directors of ARA Group, regardless of whether employment is on a permanent or temporary, casual, full-time or part-time basis (**Employees**) and extends to those who may be reasonably affected by ARA Group's work.

2 Definitions

"WHS Legislation" refers to the applicable legislation, regulations and rules setting out the obligations of ARA Group with respect to the health and safety of its Employees, including but not limited to:

- (a) *Work Health and Safety Act 2011 (Cth)*;
- (b) *Work Health and Safety Act 2011 (ACT)*;
- (c) *Work Health and Safety Act 2011 (NSW)*;
- (d) *Work Health and Safety (National Uniform Legislation) Act 2011 (NT)*;
- (e) *Work Health and Safety Act 2011 (QLD)*;
- (f) *Work Health and Safety Act 2012 (SA)*;
- (g) *Work Health and Safety Act 2012 (TAS)*;
- (h) *Occupational Health and Safety Act 2004 (VIC)*;
- (i) *Work Health and Safety Act 2020 (WA)*; and
- (j) *Health and Safety at Work Act 2015 (NZ)*.

"Workplace" means any place where work is carried out for ARA Group, and includes any place where an Employee goes, or is likely to be, while at work. This may include office locations, warehouses and workshops, construction sites, vehicles, and other mobile structures on land or water.

3 Compliance

All Employees are required to comply with this Policy and other applicable policies, procedures and instructions issued by ARA Group from time to time, pertaining to health and safety responsibilities in the Workplace. No Employee is permitted, for whatsoever reason, to deviate from or act in a manner contrary to such responsibilities or WHS Legislation, and such conduct may result in disciplinary action.

4 Prioritising health and safety

The health and safety of Employees in the Workplace is paramount to ARA Group. In accordance with ARA Group's commitment to providing a safe and healthy Workplace, at all times the health and safety of Employees is to take precedence over job expediency and other considerations. Under no circumstance whatsoever is this principle of priority to be overlooked or deviated from.

5 General measures

As part of ARA Group's general commitment to ensuring the health and safety of Employees, ARA Group:

- (a) has a number of policies and procedures in place designed to eliminate and otherwise reduce risk, including but not limited to ARA Group's:
 - (i) Personal Protective Equipment Policy;
 - (ii) Drug, Alcohol and Smoking Policy;
 - (iii) Fatigue Management Policy;
 - (iv) Working in Extreme Conditions Policy; and
 - (v) Rehabilitation and Return to Work Policy.
- (b) undertakes due diligence to ensure Workplace premises are safe, secure, and suitable for their intended use;
- (c) undertakes due diligence to ensure Employees are qualified for the tasks assigned to them, where such tasks and jobs involve hazards and risk;
- (d) only purchases machinery, equipment and vehicles which comply with applicable safety standards;
- (e) integrates Workplace health and safety management into ARA Group projects, such as by requiring WHS Legislation be complied with in contracts it enters into;
- (f) involves Employees in decision making processes through communication, consultation, and training, as applicable from time to time; and
- (g) provides information, instructions and training materials to enable Employees to work in the safest way possible, as applicable from time to time.

6 Risk management

- 6.1 In accordance with WHS Legislation, ARA Group must do all things reasonably practicable to eliminate or (where not reasonably practicable to eliminate risk), reduce risks to the health and safety of Employees.
- 6.2 The circumstances surrounding a risk will dictate what measures qualify as 'reasonably practicable'. Accordingly, the measures implemented by ARA Group in eliminating or reducing risks will vary depending on:
 - (a) the likelihood of the risk concerned occurring;
 - (b) the degree of harm that might result from the risk;
 - (c) what is known or ought reasonably to have been known about the risk and the ways of eliminating or minimising the risk;
 - (d) the availability and suitability of ways to eliminate or minimise the risk; and
 - (e) the cost associated with the available ways of eliminating or minimising the risk, including whether such cost is grossly disproportionate to the risk.
- 6.3 Notwithstanding paragraph 6.2, where eliminating a risk is not reasonably practicable, ARA Group may adopt any of the following measures for the purposes of reasonably practicably reducing a risk:
 - (a) substitute a hazard giving rise to a risk with a hazard that gives rise to a lesser risk;
 - (b) isolate the hazard from persons put at risk;
 - (c) minimise the risk by practical engineering means (i.e. by doing things differently so as to reduce the likelihood of the risk occurring);
 - (d) minimise the risk by administrative means (i.e. by adopting safe work practices or providing appropriate instruction or information);
 - (e) use personal protective equipment.

7 Monitoring and reviewing risk management

ARA Group acknowledges that continuous improvement is required to achieve its commitment to protecting the health and safety of Employees, particularly in the face of new hazards and risks. Accordingly, ARA Group monitors its risk management measures and will revise such measures from time to time where necessary to ensure risks are continuously eliminated or otherwise reduced.

8 Notification

As required by law, ARA Group will report Notifiable Incidents to applicable Workplace health and safety regulators immediately after becoming aware of such occurring. For the purposes of this paragraph 8, a **'Notifiable Incident'** is the death of, or serious injury or illness to a person, or a dangerous incident.



21 January 2026

Edward Federman
Chief Executive Officer

Date