

## SEXUAL HARASSMENT POLICY

### 1. PURPOSE

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) are committed to creating a safe, diverse and inclusive place of work. Sexual harassment is not tolerated by the ARA Group, and the ARA Group is committed to ensuring its workplaces are free from sexual harassment and all employees are treated with dignity, courtesy and respect.

This policy sets out ARA Group's expectations about how ARA Group's employees are expected to behave in order to prevent sexual harassment in the Workplace. It covers what sexual harassment is, how to speak up, support available, action that will be taken by the ARA Group and the consequences for breaching this policy.

### 2. SCOPE

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; and
- (c) contractors and consultants of the ARA Group.

### 3. GENERAL PRINCIPLES

#### 3.1 Definitions

"**Employee Grievance Policy**" means the ARA Group policy of identical name.

"**Workplace**" includes:

- (a) the place of work of a person accused of Bullying and/or harassment;
- (b) the place of work of a person alleging 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.

"**Workplace Legislation**" means the laws dealing with employment and Workplace matters, including but not limited to the *Fair Work Act 2009* (Cth) and the *Work Health and Safety Act 2011* (Cth) in Australia, and *Employment Relations Act 2000* (NZ) and *Health and Safety at Work Act 2015* (NZ) in New Zealand.

#### 3.2 Sexual Harassment

Sexual harassment is any unwelcome sexual advances, requests for sexual favours and other verbal, visual and/or physical conduct of a sexual nature.

Sexual harassment also includes, but is not limited to, unwelcome sexual flirtations, advances or propositions, verbal abuse of a sexual nature, subtle pressure or request for sexual activities, unnecessary touching of an individual, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, a display in the Workplace of sexually suggestive objects or pictures, sexually explicit or offensive jokes, or physical assault.

Examples of unlawful sexual harassment include (but are not limited to):

- Suggestive comments about a person's body or appearance.
- Staring at a person or parts of their body.
- Demands that revealing clothing be worn.
- Tales of sexual performance.
- Persistent, unwelcome proposals of marriage.
- Pornographic or nude posters in the workplace.

- Touching a person in a sexual way.
- Sexual assault.
- Flashing.
- Asking questions about a person's sex life or lack thereof.
- Persistent requests for a night out where these are rejected.
- Requests for sex where these are unwelcome.

Sexual harassment is not:

- behaviour based on mutual attraction, friendship and respect.
- interactions that are consensual, welcome and reciprocated.

Sexual conduct that has been welcomed in the past may become unwelcome.

### **3.3 Sex-based harassment and discrimination**

Sex-based harassment and discrimination mean unwelcome conduct of a seriously demeaning nature by reason of the person's sex in circumstances in which a reasonable person would have anticipated that the person harassed would be offended, humiliated or intimidated.

Examples of unlawful sex-based harassment and discrimination include (but are not limited to):

- Asking intrusive personal questions based on a person's sex.
- Making inappropriate comments and jokes to a person based on their sex.
- Displaying images or materials that are sexist, misogynistic or misandrist.
- Making sexist, misogynistic or misandrist remarks about a specific person.
- Requesting a person to engage in degrading conduct based on their sex.

### **3.4 Employees Responsibility**

The prevention of sexual harassment and sex-based harassment and discrimination in the Workplace is the responsibility of ARA Group and its Employees. This means that Employees must:

- not engage in unwelcome behaviour or conduct of a sexual or demeaning nature towards anyone in the workplace and always do the right thing;
- behave professionally and treat others with dignity, courtesy and respect whether at work, working from home or outside of work settings;
- take accountability for identifying, managing and reporting risks;
- speak up and report concerns about sexual harassment and/or sex-based harassment and discrimination (including where the Employee has witnessed it or become aware of it); and
- protect and support and not disadvantage or unfairly treat a person for making or being involved in a complaint.

## **4. EMPLOYEE TRAINING**

All new employees of ARA Group will be required to familiarise themselves with this Policy and undertake ARA Group's Sexual Harassment Compliance Training Module as part of the employee onboarding process.

From time to time, additional educational training may be required to be completed by persons subject to this Policy, including both new and existing employees.

## 5. NO TOLERANCE POLICY

ARA Group believes that all employees should be able to work in an environment free of sexual harassment and sex-based harassment and discrimination. Sexual harassment and sex-based harassment and discrimination is totally unacceptable in any and all ARA Group Workplaces and will not be tolerated under any circumstances whatsoever.

## 6. COMPLAINTS

All complaints concerning alleged breaches of this Policy must be made in accordance with ARA Group's Employee Grievance Policy.

Notwithstanding the above, at any time, Employees may also choose to take a complaint of sexual harassment to the following organisations amongst others:

<b>Fair Work Commission (Cth)</b> Phone: 1300 799 675 Website: <a href="http://www.fwc.gov.au">www.fwc.gov.au</a>	<b>Employment Relations Authority (NZ)</b> Phone: 09 970 1550 Website: <a href="http://www.era.govt.nz">www.era.govt.nz</a>
<b>Anti-Discrimination Board (NSW)</b> Phone: 1800 670 812 Website: <a href="http://www.antidiscrimination.nsw.gov.au">www.antidiscrimination.nsw.gov.au</a>	<b>SafeWork NSW</b> Phone: 13 10 50 Website: <a href="http://www.safework.nsw.gov.au">www.safework.nsw.gov.au</a>
<b>Equal Opportunity and Human Rights Commission (VIC)</b> Phone: 1300 292 153 Website: <a href="http://www.humanrights.vic.gov.au">www.humanrights.vic.gov.au</a>	<b>WorkSafe Victoria</b> Phone: 1800 136 089 Website: <a href="http://www.worksafe.vic.gov.au">www.worksafe.vic.gov.au</a>
<b>Queensland Human Rights Commission (QLD)</b> Phone: 1300 130 670 Website: <a href="http://www.qhrc.qld.gov.au">www.qhrc.qld.gov.au</a>	<b>WorkSafe QLD</b> Phone: 1300 362 128 Website: <a href="http://www.worksafe.qld.gov.au">www.worksafe.qld.gov.au</a>
<b>Office of the Anti-Discrimination Commissioner (TAS)</b> Phone: 1300 305 062 Website: <a href="http://www.antidiscrimination.tas.gov.au">www.antidiscrimination.tas.gov.au</a>	<b>WorkSafe Tasmania</b> Phone: 1300 366 322 Website: <a href="http://www.worksafe.tas.gov.au">www.worksafe.tas.gov.au</a>
<b>Equal Opportunity SA (SA)</b> Phone: 1800 188 163 Website: <a href="http://www.eoc.sa.gov.au">www.eoc.sa.gov.au</a>	<b>SafeWork SA</b> Phone: 1300 365 255 Website: <a href="http://www.safework.sa.gov.au">www.safework.sa.gov.au</a>
<b>Equal Opportunity Commission (WA)</b> Phone: 08 9216 3900 Website: <a href="http://www.equalopportunity.sa.gov.au">www.equalopportunity.sa.gov.au</a>	<b>WorkSafe WA</b> Phone: 1300 307 877 Website: <a href="http://www.worksafe.wa.gov.au">www.worksafe.wa.gov.au</a>
<b>ACT Human Rights Commission (ACT)</b> Phone: 02 6205 2222 Website: <a href="http://www.hrc.act.gov.au">www.hrc.act.gov.au</a>	<b>Work SafeACT</b> Phone: 13 22 81 Website: <a href="http://www.worksafe.act.gov.au">www.worksafe.act.gov.au</a>
<b>Northern Territory Anti-Discrimination Commission (NT)</b> Phone: 1800 813 846 Website: <a href="http://www.adc.nt.gov.au">www.adc.nt.gov.au</a>	<b>NT WorkSafe</b> Phone: 1800 019 115 Website: <a href="http://www.worksafe.nt.gov.au">www.worksafe.nt.gov.au</a>
<b>NZ Human Rights Commission (Te Kāhui Tika Tangata)</b> Phone: 0800 496 877 Website: <a href="http://www.tikatangata.org.nz">www.tikatangata.org.nz</a>	<b>WorkSafe New Zealand</b> Phone: 0800 030 040 Website: <a href="http://www.worksafe.govt.nz">www.worksafe.govt.nz</a>
<b>Australian Human Rights Commission (Cth)</b> Phone: 1300 656 419 Website: <a href="http://www.humanrights.gov.au">www.humanrights.gov.au</a>	

## 7. DISCIPLINARY ACTION

Sexual harassment and sex-based harassment and discrimination is unlawful and prohibited under Federal, State and Territory laws. Employees may be personally liable if they engage in such conduct. Additionally, the ARA Group may also be liable for Employees actions.

A breach of any part of this Policy may result in disciplinary action subject to ARA Group's Employee Grievance Policy, including but not limited to suspension or termination of employment.

Some forms of sexual harassment such as sexual assault, rape and stalking may also constitute a criminal offence under State and Territory Laws. In some cases, the ARA Group may be required to report the matter to the Police.



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Edward Federman  
Chief Executive Officer

21 January 2026

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Date