

WORKPLACE SURVEILLANCE DEVICES POLICY

ARA Group Limited ABN 47 074 886 561 and its related corporate entities in Australia and New Zealand (collectively **ARA Group**) is committed to protecting the safety and privacy of all permanent and temporary employees, directors, officers, personnel and contractors of ARA Group together with all third parties acting on ARA Group's behalf or representing ARA Group's interests, such as agents and consultants (collectively referred to as **Employees**).

This Workplace Surveillance Devices Policy (**Policy**) applies to all Employees and is intended to operate alongside ARA Group's Privacy Policy and Employee Privacy Policy.

1 DEFINITION

Surveillance Devices includes any type of devices, such as listening devices, optical surveillance devices, tracking devices, and data surveillance devices.

Workplace means premises, or any other place, where persons work or conduct a business or undertaking, or any part of such premises or place.

2 PURPOSE OF SURVEILLANCE

The purpose of this Policy is to ensure Employees are aware of the instances where Surveillance Devices are reasonably used within the Workplace to protect company property or detect theft, ensure Workplace safety, determine if employees are engaged in unlawful activities, and ensure staff are doing their work and using resources appropriately.

3 PROHIBITED AREAS

Surveillance Device will not be installed, used or maintained to observe, listen to, record or monitor the activities or conversations of the Employees in a toilet, washroom, change room or lactation room in the Workplace.

4 CONSENT TO SURVEILLANCE

Unless notice is required by law, the Employees are taken to have been notified about the use of Surveillance Devices within the Workplace via this Policy and consent is implied through continued employment.

5 DATA COLLECTION AND USAGE

Any personal data or information collected through Surveillance Device will be administered in accordance with ARA Group's Privacy Policy and Employee Privacy Policy, and protected from misuse, interference, loss, and unauthorised access.

6 COMPLIANCE

This Policy complies with all the relevant Australian and New Zealand relevant laws and regulations pertaining to surveillance in the Workplace.

7 COMPLAINTS

Any complaints in relation to this Policy including any breach of this Policy can be made in writing by directly to the ARA Group's General Counsel, via any of the contact methods listed below; or

General Counsel

MOBILE	+61 421 807 773
EMAIL	azita.doudmamn@aragroup.com.au legal@aragroup.com.au
MAIL	c/- ARA Legal, General Counsel Suite 1, 83 Alexander Street Crows Nest NSW 2065

8 REVIEW

This Policy will be reviewed periodically to ensure its effectiveness and relevance to ARA Group's goals and objectives. Amendments may be made as necessary to reflect changes in legislation.



Edward Federman
Chief Executive Officer

21 January 2026

Date