BULLYING AND HARASSMENT POLICY

1.0. PURPOSE

This policy outlines the expectations and obligations applicable to all employees. The purpose of this policy to ensure that all Glad Group employees and stakeholders are treated fairly and with respect. This policy includes the process that Glad Group will complete following raised concerns of bullying and/or harassment.

2.0. SCOPE

The Bullying and Harassment policy applies to all Glad Group entities as outlined below:

- **Glad Group Pty Ltd** | ABN 62 092 928 115
- Glad Security Pty Ltd trading as **Glad Group Services** | ABN 99 122 097 590
- **Glad Maintenance Pty Ltd** | ABN 85 127 522 481
- **Auxus Pty Ltd** | 12 655 147 292
- Stratium Global Pty Ltd trading as **Unifyd Technology** | 55 627 094 366
- **Australian Protective Services Pty Ltd 47 610 471 424**

It applies to all employees regardless of their job title, responsibilities, seniority, or location, within every subsidiary or joint venture that Glad Group has control over.

The bullying and harassment policy draws on legislation, regulations, policies and procedures, employment contracts and best practice.

3.0. POLICY STATEMENT

Glad Group expects that all employees are treated fairly and with respect. Employees have the right to a working environment free of bullying and harassment. Bullying and harassment is an abuse of a person's human rights. Glad Group will not tolerate inappropriate language, bullying, harassment, or victimisation of any kind in the workplace towards our employees, contractors, customers, or visitors/members of the public. This includes engaging in or condoning bullying, harassment, and discrimination behaviours.

Glad Group manages bullying and harassment in accordance with but not limited to state and federal legislation, policies and procedures and employment contracts.

Glad Group is committed to maintaining a Speak Up culture by promoting an open and trusting dialogue with employees at all levels. All employees play a role in ensuring that our workplaces are free from all forms of bullying and harassment. This means, if you witness unacceptable behaviour towards an employee or group of employees, then you have a responsibility to act. Responsibilities are detailed further in section 3.6 and 3.7.

3.1. Bullying

Bullying may take many forms and can occur within the workplace when:

- a person or group of people repeatedly behave unreasonably towards an employee or group of employees and;

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

- the behaviour creates a risk to health and safety

It is important to understand that intention is irrelevant when considering if a behaviour is in fact bullying. Labelling a behaviour as a joke or stating something to the effect of 'I didn't mean to cause offence' or 'it's just the way I am/talk,' does not justify the behaviour. Where a reasonable person, having regard to all the circumstances would expect a behaviour, joke, or banter to victimise, humiliate or undermine or threaten another, then the "intention" of the alleged bully is irrelevant.

Bullying in the course of employment is considered serious misconduct is a valid reason for termination of employment without notice.

Bullying includes, but not limited to:

DIRECT BULLYING	INDIRECT BULLYING
▪ abusive, insulting, or offensive language ▪ spreading misinformation or rumours ▪ behaviour or language that frightens, humiliates, belittles, or degrades ▪ over criticising ▪ displaying offensive material ▪ comments about a person's appearance, lifestyle, gender, sexual preference, nationality, family ▪ Teasing, performing pranks or playing practical jokes ▪ interfering with someone's personal property or work equipment ▪ pressuring someone to behave inappropriately	▪ unreasonably overloading someone with work or not providing enough work ▪ setting difficult or unachievable deadlines or constantly changing deadlines ▪ setting unreasonable tasks beyond someone's skill level ▪ excluding someone from work-related events ▪ Ignoring someone or a group of people to exclude them from normal workplace interactions ▪ withholding information that is vital for effective work performance ▪ denying access to information, consultation, or resources relevant to someone's work or employment ▪ withholding pay, changing rosters, or denying leave for the sole reason to inconvenience someone

What is not bullying?

Many things that happen within the workplace are generally not considered to be bullying, although some experiences can be uncomfortable for those involved. Respectful differences in opinion, performance management, conflicts and personality clashes can happen in any workplace, but do not necessarily meet the definition of bullying.

Reasonable Management Actions

Reasonable management of employees carried out in a reasonable manner is not bullying. Managers have the right to and are expected to supervise, manage, and lead their teams. This includes but is not limited to:

- reasonably directing the way in which work is performed
- undertaking performance reviews
- providing feedback (both positive and constructive)
- initiating and undertaking a performance management process
- transferring an employee for legitimate and explained operational reasons

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

- implementing organisational changes or restructures
- taking disciplinary action, including suspension or terminating employment where appropriate and justified

3.2. Harassment

Harassment is any kind of behaviour that undermines someone's dignity and is unacceptable or humiliating to them. Harassment is discriminatory and targets someone because of their age, gender, race, disability, or ethnicity or similar.

Harassment does not have to be repeated or continuous. It can be a one-off incident.

As with bullying, intent is irrelevant when considering if a behaviour is in fact harassment. Labelling a behaviour as a joke or stating something to the effect of 'I didn't mean to cause offence' or 'it's just the way I am/talk,' does not justify the behaviour. Where a reasonable person, having regard to all the circumstances would expect a behaviour, joke, or banter to victimize, humiliate or undermine or threaten another, then the "intention" of the alleged harasser is irrelevant.

Harassment in the course of employment is considered serious misconduct is a valid reason for termination of employment without notice.

Harassment may include, but is not limited to:

- abuse or comments that degrade or stereotype people
- derogatory or demeaning jokes based on stereotyped characteristics
- persistent or intrusive questions or comments about an individual's personal life
- unwelcome invitations especially after prior refusal
- racist or other discriminatory behaviour
- mocking someone's accent, customs, or cultures
- derogatory comments about race, religion, and customs
- mocking the habits of someone with a disability
- engaging in behaviour which is embarrassing, humiliating, or intimidating to another person
- jokes or offensive gestures based on race, sexuality, pregnancy, disability, etc
- excluding a person or group because of their race, sexuality, pregnancy, disability, etc
- display or circulation of racist or other offensive material

3.3. Sexual Harassment

Sexual harassment within the workplace occurs when an employee or a group of employees:

- makes an unwelcome sexual advance
- makes an unwelcome request for sexual favours
- engages in other unwelcome conduct of a sexual nature

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

- engages in verbal abuse or insults as well as behaviours that aim to marginalise based on sex or gender.

Sexual harassment does not have to be repeated or continuous. It can be a one-off incident.

The intention of the alleged harasser is not a factor when determining whether someone has been sexually harassed. Labelling the behaviour as a joke or stating something to the effect of 'I didn't mean to cause offence' or 'it's just the way I am/talk' is no excuse.

For it to be considered sexual harassment, it must be reasonable to expect that there is a possibility that the employee would be offended, humiliated, or intimidated by the behaviour. This means that a behaviour that is considered sexual harassment in one situation may not be the case in another.

Sexual harassment in the course of employment is considered serious misconduct is a valid reason for termination of employment without notice.

Sexual harassment is, but not limited to:

- unwelcome sexual propositions or advances
- suggestive behaviour, such as leering and staring
- inappropriate physical contact such as unwelcome touching or hugging or deliberately brushing up against someone
- intrusive questioning about a person's private life or body
- suggestive jokes or comments
- insult or taunt of sexual nature
- continued requests to go out
- displaying sexually explicit materials
- unwelcome and offensive phone calls
- sexually explicit emails, text, or app messages
- sexual assault

Police Intervention

Some forms of sexual harassment are criminal offences and may be prosecuted as such. Should an employee report a behaviour to Glad Group that has also been reported to the police, the police are not obliged to disclose any information to Glad Group. Glad Group is dependent on the employee to keep us updated with the progress of a police investigation.

If it is confirmed to Glad Group that the police are dealing with the case, we will let the police investigate the crime. Glad Group must consider the potential damaging impact of a workplace investigation on a police investigation. If there is a risk that the workplace investigation will harm the police investigation, Glad Group will let the police investigate first. In these circumstances Glad Group's primary role is to take care of the welfare of the employee/s involved and keep them safe at work. Glad Group may continue to investigate breaches under the Code of Conduct or other relevant workplace policies during the police investigation.

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

Behaviour that is not considered sexual harassment might still be considered bullying or discrimination within the workplace. It could also breach anti-discrimination or work health and safety laws.

3.4. Victimisation

Victimisation is treating a person unfairly because that person, or someone they associate with, has made, or intends to make a complaint in relation to unacceptable behaviour within the workplace, or takes related action.

Victimisation is unlawful and Glad Group will take no action against anyone for making or helping someone make a genuine complaint.

Victimisation in the course of employment can be considered serious misconduct and be a valid reason for termination of employment without notice.

3.5. What is the Reasonable Person test?

When considering if a behaviour or action is bullying or harassment, Glad Group will consider if a reasonable person having regard to all the circumstances would expect that behaviour or action to victimise, humiliate or undermine or threaten another. In considering what is reasonable Glad Group will take into consideration all the circumstances including:

- Is there an imbalance of power between the parties?
- Where did the behaviour or action take place?
- Is there a history of interpersonal conflict between the parties?
- The language, tone and volume used

When applying the reasonable person test, Glad Group will not consider if the alleged offender:

- intended to victimise, humiliate, or undermine or threaten or not
- would have personally found the behaviour or action offensive or not

3.6. Preventing Bullying and Harassment

Glad Group aims to prevent bullying and harassment by monitoring our workplace culture and regularly reviewing our policies and procedures. This includes, but is not limited to:

- providing internal and external training
- conducting exit interviews
- gathering feedback via employee surveys
- reviewing and investigating feedback from customers and suppliers
- conducting internal and external site audits
- conducting risk assessments
- providing reporting alternatives to employees

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

Glad Group expects employees to help with the prevention of bullying and harassment by being clear about what kind of behaviour is appropriate and what is not. Employees are also expected to contribute positively to workplace culture, by calling out poor behaviour directed towards themselves or others.

All employees play a role in ensuring that our workplaces are free from all forms of bullying and harassment. This means, if you witness unacceptable behaviour towards an employee or group of employees, then you have a responsibility to act. This means, if it is safe and appropriate to do so, then call out poor behaviour on the spot. Remember that the behaviour that we accept is the behaviour that we condone. If you see unacceptable workplace behaviour, make it clear that you do not support, encourage, or condone that behaviour. Alternatively, if you do not feel confident or safe to speak up on the spot, then you must ensure that you report the behaviour to someone who can act on it. This would typically be your direct manager, but in some instances, it may be People and Culture or the Whistleblower Service.

3.7. Responding to Reports of Bullying and Harassment

Glad Group takes all reports of any form of bullying or harassment very seriously. All complaints will be investigated unless the employee that makes the complaint advises that they do not wish for an investigation to commence. Even under those circumstances and depending on the seriousness of the complaint, Glad Group may commence an investigation.

Manager Responsibilities

DO	DO NOT
▪ behave consistently with this policy ▪ intervene when observing unreasonable behaviour ▪ enquire into the matter immediately or as soon as reasonably practicable ▪ resolve the complaint as quickly as possible ▪ by sympathetic, sensitive and serious ▪ ensure procedural fairness during the investigation process ▪ keep the matter confidential as far as reasonably practicable ▪ take preventative measures within the workplace, for example staff training ▪ engage People and Culture for advice and support if in any doubts	▪ ignore the complaint ▪ tell the employee making the complaint to handle it themselves ▪ make a pre-judgement about whether the complaint is true or not ▪ say that the employee should ignore the bullying or harassment ▪ talk to anyone about the issue except those involved in the investigation and outcome of the complaint ▪ prejudge the merits of the complaint ▪ victimise ▪ be biased

Investigations can be informal or formal depending on the circumstances and seriousness of the alleged bullying or harassment. Investigations can be led by management or People and Culture or both. Managers are expected to lead informal investigations with the support of People and Culture where required. Glad Group may also engage an external investigator if required. It is expected that People and Culture be engaged for advice and support if in any doubts.

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

Support

Glad Group provides employees with support throughout the investigation process, including those who are reporting and those whom the allegations are made against. The support includes:

- ensuring everyone involved understands the process and timeframes
- providing access to external counselling via the employee assistance program
- providing language support as required
- allowing and encouraging a support person

In certain circumstances, it may be appropriate to temporarily stand down or transfer a person involved in an ongoing investigation. This might be necessary to ensure the health and safety of those involved, or to ensure that service delivery to customers is not disrupted.

3.8. Investigation Outcomes

If Glad Group has determined that bullying and harassment took place, potential outcomes may include (but are not limited to):

- mediation between the relevant parties
- implementing workplace changes such as reducing or removing 1 on 1 interactions between relevant parties
- taking disciplinary action against the employee whose actions constituted bullying. This may include termination of employment
- internal or external training
- providing ongoing support to employees involved via the employee assistance program
- reviewing the culture at the site where the bullying and harassment took place. This may lead to additional training to employees and managers to take further steps to improve the culture, increase awareness of Glad Group policies and procedures and to prevent bullying and harassment in the future. It may also include a restructure of teams including site transfers.

If Glad Group has determined that bullying and harassment did not take place or cannot substantiate the allegation, employees may still receive formal or informal training regarding what type of workplace behaviour is acceptable or unacceptable. This mayinclude(but is not limited to):

- internal or external training
- toolbox talks

Assistance may still need to be provided to resolve any outstanding issues. This may include(but is not limited to):

- mediation
- external counselling via the employee assistance program
- changes in working arrangements

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

3.9. Grievance Procedure

Glad Group promotes a Speak Up culture and encourages all employees who feel they have been bullied, harassed, or victimised to raise their concerns. This can be done in accordance with the grievance resolution policy, by contacting People and Culture or the Whistleblower Service.

- gladacademy@gladgroup.com.au
- https://www.whistleblowingservice.com.au/gladgroup/

Employees that raise concerns of alleged bullying and harassment and the complaint is found to be malicious, frivolous, or vexatious may be subject to disciplinary action up to and including termination.

3.10. Employee Assistance Program

All employees and their immediate family members have access to Glad Group's EAP (Employee Assistance Program) service. This is a confidential wellbeing, coaching and support service provided at no cost to employees and their immediate family. They can be contacted via:

- Phone (AU): 1800 808 374
- Website: assureprograms.com.au/appointment
- Chat: Download the Wellbeing Gateway Application and use Company Code: GLA2254

4.0. LOG OF CHANGES

DATE	AMENDMENTS	AUTHORISED BY	REVISION
	Initial Policy	Human Resources	1
June 2018	Revised Policy	Human Resources	2
November 2022	Revised Policy	Chris Errington	3
May 2023	General updates	Ann Shanahan	4
June 2025	Manager responsibilities and general updates	Ann Shanahan	5

5.0. RELATED POLICIES AND PROCEDURES

- Glad Group code of conduct
- grievance resolution policy
- EEO (equal employment opportunity) and anti-discrimination policy
- IBMS Manual

© COPYRIGHT GLAD GROUP (ALL RIGHTS RESERVED)

6.0. CONTACT FOR QUESTIONS

Please contact People and Culture if there are any questions regarding this policy.

Authorised by:



Kiri Chase
Head of People and Culture