CONFIDENTIALITY POLICY

1.0. PURPOSE

This policy outlines the expectations and obligations on all employees to ensure the highest standard of confidentiality within all business operations. Confidentiality within the workplace is essential to provide all employees with an environment that allows for open and transparent discussion and communication that will remain confidential, while at the same time protecting Glad Group from breaches in confidentiality.

2.0. SCOPE

This policy is applicable to all Glad Group employees, contractors, suppliers and partners. For the purpose of this policy Glad Group consists of:

- **Glad Group Pty Ltd** | ABN 62 092 928 115
- Glad Security Pty Ltd trading as **Glad Group Services** | ABN 99 122 097 590
- **Australian Protective Services** | ABN 46 610 471 424
- **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

3.0. POLICY STATEMENT

Glad Group is committed to maintaining the highest standard of confidentiality within its operations. Employees often have access to information relating Glad Group's commercial or internal business arrangements that is considered confidential. This information helps create a competitive advantage in the marketplace and is a valuable asset to Glad Group. There are also times where there are discussions and private information disclosures between employees that must be treated with respect and confidentiality.

3.1. Confidential Information

Employees must comply with any obligations in employment contracts, confidentiality agreements or other agreements that apply to confidential information.

Confidential Information includes but is not limited to:

- trade secrets
- confidential know-how attained in the course of, or in connection with employment with the Company or in relation to Glad Group
- any written, oral or recorded information of commercial, operational, technical or financial nature, which is not publicly available
- information relating to Glad Group's planning, strategy, employee information, databases, software, competitiors, suppliers or customers

Employees must not:

- disclose confidential information outside of Glad Group unless prior written authorisation has been obtained
- use confidential information for any purpose other than to benefit Glad Group

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- disclose confidential information to other employees, unless they need to know or require the information to perform their duties and they agree to ensure that confidentiality is maintained
- use Glad's Group's confidential information to obtain personal financial gain or other advantages for themselves or others
- use the information to cause detriment or disrepute to Glad Group or its customers
- remove any documents, records or technology that contains confidential information from Glad Group's premises without prior written authorisation.

3.2. How long does the obligation lasts?

The obligation to protect Glad Group's confidential information does not end upon an employee's cessation of employment. It continues until the information becomes publicly available through legitimate channels, or until Glad Group no longer consider the information to be confidential or proprietary. If employees (or former empoyees) are unsure whether information is still Glad Group's confidential information, the information must be treated as confidential.

3.3. Verbal Conversations

Where employees find themselves in a situation where they can overhear a conversation, including but not limited to face-to-face, phone or video conversations taking place that is not intended to be heard by others, employees must advise those involved that they can hear them and/or remove themselves from range. It is the employees' responsibility to respect the confidentiality of those participating in those conversations.

Employees that participate in confidential conversations must ensure that the conversations are held in a private setting as far as reasonably practicable.

3.4. Emails

Email correspondence can be mistakeably or deliberately viewed by persons other than the intended recipient. Should employees find themselves in this situation, it is their responsibility to respect the confidentiality of the information that they have seen.

If the employee is not the intended recipient of an email, they must not disclose, retain, copy, or forward the information to any other person, unless they have received explicit consent or are required to do so by law. If the employee has received the email in error, the sender must be notified immediately and email deleted. Any unauthorised use, print, disclosure, or distribution of this communication is strictly prohibited and considered a serious breach of confidentiality.

3.5. Protect Confidential Information

Employees must take steps to protect information, including but not limited to:

- holding conversations and meetings in a private setting as far as reasonably practicable
- no disclosing of passwords
- no deliberate disclosing of confidential information to unauthorised persons
- closing or locking technology such as laptops when left unattended or not in use
- no keeping of confidential information on desks or in plain sight when not present
- no removal of confidential information from the workplace unless required for Glad Group business
- keeping confidential information secure so that unauthorised persons can't access it

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- ensuring compliance with other Glad Group policies, agreements and employment contracts relating to privacy and confidentiality.

Breaches of this policy may result in disciplinary action up to and including termination of employment. Breaches that amount to criminal conduct may be reported to the police.

4.0. LOG OF CHANGES

DATE	AMENDMENTS	AUTHORISED BY	REVISION
June 2019	Initial Policy	Nick Iloski	1
November 2022	General Updates	Nick Iloski	2
December 2024	General Updates	Ann Shanahan	3

5.0. RELATED POLICIES AND PROCEDURES

- Glad Group Code of Conduct
- Privacy Policy
- Conflict of Interest Policy
- Data Retention and Destruction Standard

6.0. CONTACT FOR QUESTIONS

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

Authorised by:



Head of People & Culture
Kiri Chase

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