CONFLICT OF INTEREST POLICY

1.0. PURPOSE

This policy outlines the expectations and obligations applicable to all employees. The purpose of this policy is to ensure that Glad and its customers, suppliers and stakeholders are confident of the impartiality of its decisions, advocacy and processes. It aims to promote Glad's 'Speak Up' culture in which honesty, integrity and business ethics are part of everyday behaviour and to prevent conflicts of interest from influencing actions or decision making.

2.0. SCOPE

This Conflict of Interest Policy applies to all Glad Group entities as outlined below:

- **Glad Group Pty Ltd** | ABN 62 092 928 115
- **Glad Cleaning Service Pty Ltd** | ABN 43 054 617 891
- 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
- **Glad Group NZ Limited |** NZBN 9429 047 106 437

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.

3.0. POLICY STATEMENT

A conflict of interest exists when a reasonable person might perceive that an employee's personal interests could be favoured or have influence over their role and duties.

A conflict of interest occurs when an employee's personal interests such as but not limited to family, friendships, financial or social factors could compromise their judgement, decisions, or actions in the workplace.

A conflict of interest can also arise when an employee seeks to use their position (or be seen to their position) to gain or seek to gain advantage for themselves or others or to cause detriment to Glad. It can also include avoiding a personal disadvantage.

Conflicts of interest can be:

- **Actual** – a conflict currently exists between the employee's duties and the employee's personal interests
- **Potential** – no conflict currently exists, but circumstances do exist that mean there could be a conflict in the future
- **Perceived** – there is no actual or potential conflict, but any reasonable person might perceive or believe that a conflict exists

All Employees:

- are required to disclose to Glad any conflict of interest;

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- must not act in any conflict of interest during their employment without the prior written approval of Glad; and
- should cease acting in any conflict of interest at the request of Glad, and follow Glad's directions regarding any conflict of interest.

Examples of situations that may give rise to a conflict of interest include but not limited to:

- having a financial interest in, or performing work for, a competitor of Glad
- owning a business offering similar services
- allowing personal beliefs, philosophies or attitudes to influence an employee's impartiality or professionalism
- having or developing personal relationships that go beyond the professional relationship level, where that relationship could be used to inappropriately influence business decisions
- having other employment that may, or may appear to, compromise Glad's integrity or an employee's integrity or ability to properly perform the duties of their position;
- participating in political activities to do with, or making political comments about, Glad's work
- accepting gifts, benefits or hospitality without the authorisation of Glad, where such gifts, benefits and hospitality are intended or could be perceived to be intended to influence the employee in carrying out their duties
- manager not disclosing that they are related to a candidate being considered for a position at Glad.

3.1. Managing Conflicts of Interest

The interests of Glad must always be put ahead of an individual's interests.

The employee must:

- Disclose any (or potential) conflict of interest to their manager
- Discuss and document with the manager how the conflict of interest will be managed
- Adhere to the agreed management of the conflict of interest
- Report to the manager if the conflict of interest changes or ceases

Once the employee's conflict has been disclosed the manager must:

- Discuss and document risk management strategies to be implemented to effectively manage disclosed conflict of interests
- Ensure that the management of the disclosed conflict of interest is upheld
- Report the disclosed conflict to People & Culture via email on gladacademy@gladgroup.com.au

The manger must also:

- Monitor the work of their team for any potential conflicts of interest the employees might be exposed to

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- Report any suspected conflicts to People and Culture via email on gladacademy@gladgroup.com.au

If there is a reason to believe that an employee has failed to comply with this policy, People and Culture will investigate the circumstances.

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
December 2021	Initial Policy	People & Culture	1
May 2024	Revised Policy	Ann Shanahan	2

5.0. RELATED POLICIES AND PROCEDURES

- Glad Group code of conduct
- Grievance resolution policy
- Whistleblower Policy
- IBMS Manual

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

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