Equal Employment Opportunity & Anti-Discrimination Policy

1. Purpose

This policy outlines the expectations and obligations applicable to all employees. The purpose of this policy is to ensure that all Glad Group employees and stakeholders are treated fairly and with respect when Company decisions are made. It aims to creating a work environment which promotes good working relationships, where all employees can thrive and where inclusion is encouraged. This policy includes the process that Glad Group will complete following raised concerns when an employee or prospective employee is not treated in line with the equal employment opportunities rights and obligations as outlined in this policy.

2. Scope

The equal employment opportunity (EEO) and anti-discrimination 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** | ABN 12 655 147 292
- Stratium Global Pty Ltd trading as **Unifyd Technology** | ABN 55 627 094 366
- **Australian Protective Services Pty Ltd** | ABN 47 610 471 424

It includes persons applying for jobs, employees who have not commenced work and employees at any time during the employment relationship.

3. Policy Statement

Glad Group expects that all employees are treated fairly, equally and with respect when business decisions are made. EEO is a human right and discrimination in relation to EEO is an abuse of a person's human rights. The Comopany will not tolerate any form of discrimination leading to a lack of equal employment opportunities. Glad Group manages EEO and anti-discrimination in accordance with but not limited to state and federal legislation, policies and procedures and employment contracts.

3.1. Equal Employment Opportunity

Glad Group defines EEO as the principle that everyone should have equal access to employment opportunities based on merit. Glad Group will, through reasonable management actions aim to uphold this principle.

Glad Group will provide equal opportunity in employment and employment conditions, including but not limited to:

- recruitment
- remuneration
- reward and recognition
- training
- career succession and promotions
- support and guidance

Reasonable Management Actions

Reasonable management action is justified feedback, or any reasonable action taken that is carried out in a reasonable manner. The management action is considered reasonable if it is carried out in:

- a lawful and reasonable way, taking the particular circumstance into account
- a fair, transparent way
- accordance with employment contracts, policies or procedures

3.2. Discrimination

The access to EEO must be without fear of discrimination or harassment.

Discrimination includes, but is not limited to:

DIRECT DISCRIMINATION	INDIRECT DISCRIMINATION
▪ Treating a person or group less favourable than others based on personal attributes or characteristics	▪ A matter that appears to be neutral, or the same for everyone, but which, in operation, results in a particular person or group being disadvantaged

Discrimination can also be considered bullying and harassment.

Anyone or anything, such as a process, within Glad Group that forms part of an employee's employment life cycle (recruitment, work colleagues, supervision/management, or termination) must not discriminate based on personal attributes. Personal attributes include but are not limited to:

- race or colour
- ethnicity, nationality, descent, ancestry or social origin
- gender identity
- age
- sex
- sexual orientation
- intersex status
- marital or relationship status
- breastfeed, pregnancy or family or carer responsibilities
- disabilities
- religion or political opinions
- experience of family or domestic violence

Discrimination in relation to EEO can be considered serious misconduct and be a valid reason for termination of employment without notice.

Glad Group prohibits discrimination based on personal attributes. However, behaviours or actions that breach Australian regulations, Glad Group policies, employment contracts or safety obligations are not protected and may be subject to disciplinary action.

Adverse Actions

Adverse actions against employees must not be taken based on these attributes. Adverse actions include but are not limited to:

- withholding wages
- denying of shifts
- denying access to training or work-related events
- demotions
- lack of consideration for promotions
- threatening adverse action
- disciplinary proceedings

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- dismissal

Adverse actions are not always discrimination. There are lawful reasons for adverse actions that have nothing to do with a person's attributes. It is not considered discrimination if the actions are:

- allowed under anti-discrimination laws
- related to the necessary requirements of the job or role
- reasonable management actions, carried out in a reasonable manner
- are not related to an employee's attribute

3.3. Preventing Discrimination

Glad Group aims to prevent discrimination by monitoring the 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

Glad Group expects employees to help with the prevention of discrimination 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 discrimination
- ff you witness unacceptable behaviour towards an employee or group of employees, you have a responsibility to act
- 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

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

3.4. Responding to Discrimination

Glad Group takes all reports of discrimination 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.

Investigations can be informal or formal depending on the circumstances and seriousness of the alleged discrimination. To keep investigations impartial, they are generally managed by People and Culture with the assistance of managers. Managers are encouraged to lead informal investigations with the support of People and Culture where required. Glad Group may also engage an external investigator if required. Investigations and their outcomes are kept confidential as far as reasonably practicable.

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Should a complaint be raised, for example during the recruitment or termination process, an independent person within the executive or senior leadership team will lead the investigation.

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
- ensuring that we allow and encourage 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 our customers is not disrupted.

3.5. Investigation Outcome

If Glad Group has determined that discrimination took place, the following may occur:

- mediation between the relevant parties
- implementing workplace changes
- taking disciplinary action against the employee who discriminated. 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 discrimination took place. This may lead to additional training to employees and managers to take further steps to change the culture and to prevent discrimination in the future.
- employee site transfers and restructuring of teams

If Glad Group has determined that discrimination did not take place, employees may still be reminded of what type of workplace behaviour is acceptable or unacceptable. This can include, but is not limited to:

- internal or external training
- toolbox talks

3.6. Grievance Procedure

Glad Group promotes a Speak Up culture and encourages all employees who feel they have been discriminated against 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 discrimination and the complaint is found to be malicious, frivolous, or vexatious may be subject to disciplinary action up to and including termination.

4. Related Policies, procedures and guidelines

- Glad Group code of conduct

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- grievance resolution policy
- whistleblower policy
- bullying and harassment policy
- human rights policy
- diversity policy
- social compliance policy
- IBMS manual

5. Contact for questions

Please contact People & Culture for any questions relating to this policy.

6. Log of change

Date	Amendments	Authorised by	Revision
June 2018	Initial Policy	Nick Iloski	1
June 2020	Revised Policy	Nick Iloski	2
March 2022	Revised Policy	Christopher Errington	3
May 2023	General Updates	Ann Shanahan	4
March 2026	General Updates	Ann Shanahan	5

Authorised by:



Ann Shanahan
Acting Head of People and Culture

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