CODE OF CONDUCT

1.0. PURPOSE

Glad Group is a family owned and operated business. Family values are at our core and our Code of Conduct outlines expectations of behaviour for all employees. Within Glad Group, there is a united link– a passion for service. This passion and the quality of our service has been the foundation of our success for almost 40 years. Glad Group promotes the adoption of strong ethical standards by our employees and stakeholders, including customers, suppliers, partners, and contractors.

This Code of Conduct provides an understanding of Glad Group's expectations and standards for ethical behaviour and responsible business practices.

By following this Code of Conduct, we endeavour to provide a safe workplace for everyone, based on shared values and strong personal and business ethics.

2.0. SCOPE

The Code of Conduct applies to all Glad Group entities as outlined below:

Glad Group, comprising of:

- **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 Code of Conduct draws on legislation, regulations, policies and procedures and employment contracts.

3.0. POLICY STATEMENT

This Code of Conduct governs the behaviour of all Glad Group directors, employees, labour hire staff, independent contractors, and sub-contractors (employees). It aims to ensure that in all matters we act in accordance with our values and good ethics.

The Code of Conduct provides guidance for employee behaviour in certain situations that may arise during the course of employment or in situations where Glad Group's reputation may come into disrepute or in any other way harm the Company. It is impossible to cover every scenario that may arise; however Glad Group expects all its employees to take personal responsibility for acting in accordance with our values and for delivering on our purpose.

All employees must familiarise themselves with our policies and procedures and address any questions or concerns to their manager or People and Culture. It is the responsibility of all employees to understand and comply with this Code of Conduct and with the policies and

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procedures that apply to the work that they do and the decisions that they make. Glad Group's policies can be found in Central, or they can be provided by your manager or People and Culture.

Our Human Values

- **Trust**
  We are transparent and ethical
- **Respect**
  We collaborate and share ideas without judgement
- **Integrity**
  We deliver on our commitments
- **Innovation**
  We create positive change through disruption

These human values define our approach to all that we do – they are the lens through which we check and monitor our conduct and performance.

Our Purpose

We create welcoming experiences and safe places, every day.

4.0. CODE OF CONDUCT

4.1. Leadership

While all employees are required to adhere to the Code of Conduct, as a leader or manager you are expected to act as a positive role model and inspire others to understand and comply with the Code of Conduct and other policies and procedures. This includes encouraging our people to speak up and share their opinions and feedback without fear.

DO	DON'T
▪ Value, support and develop others, by thinking and acting as an authentic team player, and managing any risk or conflict proactively. ▪ Be genuine and humble, act with integrity, and respect different points of view. ▪ Encourage a speak up culture in which employees feel comfortable discussing risks or raising concerns, by taking the necessary time to listen and promote dialogue and feedback. ▪ Take timely and well-considered decisions in the interest of Glad Group and assume personal responsibility and accountability for working in accordance with this code.	▪ Rush when making complicated decisions. ▪ Deny accountability or hide behind hierarchy when communicating difficult messages. ▪ Spread rumours, denigrate, or undermine the work of team members or other colleagues. ▪ Assume you are never done learning.

4.2. Workplace Health and Safety

Glad Group is a service provider and the safety of our employees, contractors, and visitors to the places we guard, clean, maintain and support must be our primary focus. It is the responsibility

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of all employees to ensure the health, safety, and wellbeing of our workers, contractors, and visitors.

Remember that safety encompasses both physical and psychological safety.

DO	DON'T
▪ Conduct our work in accordance with the training provided. ▪ Work in a safe way including wearing clothing and PPE as per site requirements. ▪ Prioritise personal and public safety. ▪ Identify and report/remove hazards. ▪ Report incidents in a timely manner. ▪ Speak up if you feel something is unsafe. ▪ Promote a positive workplace culture that recognises and embraces the value of individual differences in the workplace. ▪ Treat colleagues, customers, visitors, contractors and members of the public in accordance with Glad Group values.	▪ Take shortcuts and compromise on health, safety and wellbeing and always follow the rules for Glad Group and its customers. ▪ Undertake work or operate machines that you are not trained for. ▪ Skylark while at work. ▪ Disregard health and safety obligations and procedures. ▪ Forget or disregard to report any incidents. ▪ Ignore when others work unsafely.

4.3. Working without harassment or bullying

Glad Group expects that all employees are treated fairly and with respect. We will not tolerate inappropriate language, harassment or bullying of any kind in the workplace against our employees, contractors, customers or visitors/members of the public.

All forms of harassment or abuse are against company policy and will not be tolerated and may be subject to disciplinary action including termination. Glad Group is committed to maintaining a Speak Up culture by promoting an open and trusting dialogue with employees at all levels. All employees are encouraged to express their views and point out unacceptable behaviour.

DO	DON'T
▪ Always treat personal information as confidential. ▪ Always treat others with respect. ▪ Remember that exploitation of power or misuse of authority in the workplace will not be tolerated. ▪ Remember that offensive, intimidating, insulting or malicious behaviour of any kind will not be tolerated.	▪ Ever make jokes about or discriminate against gender, race, colour, ethnicity, religion, age or sexual orientation or other status. ▪ Ever distribute, display or keep on company/customer property any material which could be considered offensive. ▪ Spread malicious rumours or use email, voicemail or other means to transmit derogatory or discriminatory comments.

If you are being bullied or harassed, or are aware that someone else is, please speak to your manager, People and Culture or the Whistleblower Service.

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

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Related Policies

- Bullying and Harassment policy
- Whistle-blower policy
- Social Compliance policy
- Grievance Resolutions policy
- Equal Employment Opportunity and Anti-Discrimination policy

4.4. Inclusion and Diversity

At Glad Group, diversity is a core part of our identity with employees from more than 100 countries. We recruit our people on merit, irrespective of race, colour, religion, gender, age, sexual orientation, gender identity, disability or any other similar status.

We are committed to an inclusive workplace that embraces and promotes diversity.

DO	DON'T
▪ Treat everyone with fairness, respect, and dignity. ▪ Build high-performing teams by utilising the wisdom of our diverse workforce. ▪ Speak up if you witness or are aware of any behaviour that you believe constitutes bullying, harassment or discrimination. ▪ Report any form of bullying, harassment or discrimination to your manager or People and Culture.	▪ Engage in any form of harassment, including unwelcome gestures, comments or physical contact. ▪ Ignore evidence of discrimination around you.

Related Policies

- Diversity policy

4.5. Attendance

Employees are required to reliably fulfil their rostered or agreed work schedules as determined by a contract of employment and/or roster. Regular attendance and punctuality are of the upmost importance to keep Glad Group and its customers operating satisfactorily. Arriving late or unreported absences causes disruptions and are not acceptable.

Being late or not turning up to rostered shifts is a serious matter and Glad Group may take disciplinary action up to and including termination if:

- you are intentionally or consistently late.
- your lateness or absenteeism impacts your work, the work of your colleagues or Glad Group's and its customers operational requirements.

Failure to personally clock in and clock out of our time and attendance systems (where used) and failure to complete timesheets (where used) correctly are considered timesheet fraud. Employees who fail to clock in and clock out or complete timesheets correctly may be subject to disciplinary action including termination.

Unexcused and/or unreported absences don't count as hours worked and so Glad Group will not compensate them.

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DO	DON'T
▪ Arrive at work to be ready to commence work at the correct time. ▪ Communicate with your manager if you will not be at work due to illness, emergency situations or any other reason. ▪ Request leave before going on leave and ensure that the leave is approved before commencing the leave. ▪ Correctly clock in and clock out of the time and attendance system and complete timesheets correctly.	▪ Abuse personal/carer's leave. ▪ Be intentionally or consistently late to work. ▪ Leave work early without approval from your manager.

Related Policies

- Leave policy
- Parental Leave policy
- Cultural Leave policy

4.6. Dress Code

Site based staff

Employees who are provided with a uniform must attend work in the correct uniform every day. All employees must be neatly presented in a clean, and pressed uniform that is free from rips, tears and stains.

Office based staff (Customer Facing)

Employees who are not provided with a uniform, including office staff and leadership teams, are expected to dress according to their day.

If you are attending site visits, meeting with employees or customers then you must be professionally presented in business casual or business formal clothes. The general rule is, if you know how your customer is going to be dressed, you should match your attire accordingly.

Example 1: You have a few site visits organised for the day, including a commercial security customer. You know that this customer is always in a suit. You should wear formal business attire to match the expectations of the customer.

Example 2: You are spending the day at a retail cleaning site and will be doing a lot of walking around. You know that the customer will usually wear a polo shirt and trousers and so it is appropriate for you to dress more casually and comfortably for the day you have planned.

Office based staff (non-customer facing)

While our office environment maintains a professional but casual atmosphere, we expect employees to take care in presenting a neat and clean appearance while at work. Business casual attire is acceptable.

There are several things you must not wear in a business casual environment:

- Well-worn athletic sneakers or tennis shoes.

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- Flip-flops.
- Stained or wrinkled clothing.
- Clothing with holes, such as distressed jeans.
- Clothing that is too tight or short.
- Clothing that is oversized or too loose.
- Shorts.
- Tank tops or strapless shirts unless paired with a blazer, jacket or cardigan.
- Backless or low-cut tops.
- Crop tops.
- Clothing with inappropriate logos or text.
- Activewear.

4.7. Use of Technology

Glad Group is committed to the appropriate use of Information Technology and Services to support business functions. The IT Acceptable Use Policy defines acceptable behaviour expected of users within Glad Group. Employees must comply with all IT policies and requirements governing the use of Information and Technology Systems, including tracking systems and information systems provided to employees by customers.

Glad Group treats misuse of its information systems seriously. Violations of the conditions of use may result in temporary or indefinite withdrawal of access, disciplinary action and/or demand for reimbursement to Glad Group.

DO	DON'T
▪ Take all reasonable steps to protect information and information systems assets against loss, damage and destruction. ▪ Take responsibility for maintaining the appropriate level of security when working on or off site.	▪ Share user login details including passwords. ▪ Make unauthorised changes to computers or networks. ▪ Use systems and internet for unreasonable private purposes. ▪ Use, download or install free or non-glad group software on any equipment.

Usage of Customer Information Technology Sources

Most of our employees are based on customer sites and are required to use customer IT sources to successfully perform their roles. In doing so, all employees must adhere to the following:

- Do not use or attempt to use customer IT sources for your own personal use or any other purpose than authorised by Glad Management or the customer.
- Do not use Personal drives (USB, hard drive, phone, etc) on customer IT sources.
- Do not make or attempt to make a copy of customer data or information without prior written permission from Glad Management or the customer.
- Do not install or attempt to install equipment or software on customer IT sources without the prior written approval from Glad Management or the customer.

Misuse or unauthorised use of customer IT sources will be treated as a serious matter and may result in removal from site and/or disciplinary action.

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Related Policies

- IT Acceptable use policy
- Mobile Device and Service Usage policy
- Social Media policy
- Workplace Surveillance policy

4.8. Conflict of Interest

Although we encourage employees to explore talents and business opportunities beyond their role within Glad Group, certain practices could result in a conflict of interest between confidential business practices and/or competing efforts between Glad Group and the employee. This includes personal actions that can affect Glad Group in a negative way such as loss of revenue, customers or company ideas.

Conflicts of interest also occur when outside opportunities influence the way an employee performs their job responsibilities.

Glad Group does not accept personal interests that interfere, or appear to interfere, with the employee's ability to make fair and objective decisions when performing their jobs in the best interest of Glad Group.

DO	DON'T
▪ Discuss with you manager any personal or professional relationships that could give rise to a conflict of interest. ▪ Make sure that conflicts of interest are disclosed, managed and recorded. ▪ Contact your manager or risk and compliance when you have a question.	▪ Conceal information on any actual or potential conflict of interest. ▪ Act on situations where your personal interests could appear to influence your business decision with glad group.

Related Policies

- Conflict of Interest policy

4.9. Drugs and Alcohol

All employees have a duty to take reasonable care for their own health and safety and not adversely affect the safety of others. Glad Group must manage health and safety risks, and this includes the management of use of drugs and alcohol within the workplace. This includes medicines that are prescribed or over-the-counter.

In accordance with Glad Group's Drug and Alcohol policy we outline initial and ongoing alcohol and drug tests that are a requirement for ongoing employment. Employees who fail to comply with a request for a drug and alcohol test may be subject to disciplinary action including termination.

DO	DON'T

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▪ Be fit and well to do your job. ▪ Comply with any direction from Glad Group, its customers or via a third party on behalf of Glad Group in taking a drug or alcohol test ▪ Report any suspected illegal drugs and alcohol use at work to your manager.	▪ Be under the influence of drugs or alcohol whilst at work or undertaking work duties. ▪ Use illegal drugs or alcohol while at work. ▪ Possess, distribute, offer or sell illegal or legal substances at the workplace.

Related Policies

- Drug and Alcohol policy

4.10. Environment and Sustainability

Glad Group has a responsibility to protect the environment in our operations and throughout our value chain. We must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business and in the delivery of our services. We promote co-efficiency in all our business activities by striving to reduce the overall Glad Group environmental footprint. We also engage with customers to support them reducing the environmental impacts of their businesses. Glad Group expects its supply chain to embrace, follow, and cascade our environmental sustainability commitments.

DO	DON'T
▪ Consider the environmental credentials of a product before you buy. ▪ Recycle using the appropriate bins provided.	▪ Use products at work that are not approved by Glad or its customers. ▪ Focus solely on price when purchasing a product but take into consideration the environmental impact.

Related Policies

- Environmental policy
- Green cleaning policy
- Sustainability and community engagement policy

4.11. Human Rights

Human rights are inherent to everyone whatever their nationality, place of residence, gender, national or ethnic origin, religion, or any other similar status. Everyone has the right to be treated with respect and dignity, to work in a safe workplace and to be paid fairly for their work. Glad Group has a zero-tolerance approach to all forms of human rights abuses, including modern slavery and child labour, within our business, operations, and supply chain. It is our responsibility to raise any issues or concerns if we suspect an instance of a human rights abuse.

DO	DON'T
▪ Treat everyone with dignity and respect. ▪ Ensure that you report all forms of human rights abuse.	▪ Turn a blind eye or be afraid to report anything that you think violates someone's human

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▪ If you think anybody is in immediate danger as you are performing your job, make a report directly to your manager or People and Culture.	rights, even if they are working for one of Glad Group's customers or suppliers. ▪ Disrespect anyone's human rights within the workplace.

Related Policies

- Human Rights Commitment

4.12. Business Integrity

Glad Group has zero tolerance for any form of bribery, fraud, or corruption. It will seek to take disciplinary and/or legal action against those found to have been involved in such matters. We must always act with integrity to eliminate unethical and non-compliant behaviour.

DO	DON'T
▪ Act honestly and in the best interest of Glad Group. ▪ Seek approval from Glad Group before accepting an offer of a personal benefit. ▪ Report suspected inappropriate behaviour or improper conduct to Glad Group. ▪ Cooperate with any investigations to suspected bribery, fraud and corruption. ▪ Ask for help if you are not sure.	▪ Offer, promise, give, accept, or solicit of any advantage as an incentive for an action which is illegal, unethical or a breach of trust. ▪ Accept bribes or kickbacks for any purpose, either directly or indirectly or through a third party. ▪ Accept a personal benefit when you are directly or indirectly involved to select a supplier to deliver goods and services to Glad Group. ▪ Abuse you position to achieve personal gain for yourself, another person or entity.

Related Policies

- Anti-Bribery, Fraud and Corruption policy

4.13. Following Reasonable and Lawful Direction

Employees are obligated to comply with directions from Glad Group that are:

- Lawful.
- Related to the subject of their employment; and
- reasonable, which is determined by examining the specific circumstances on a case-by-case basis.

A failure to comply with a lawful and reasonable direction may serve as valid reason for disciplinary action including termination.

4.14. Workplace Communication

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Good communication practices can help prevent workplace problems from occurring and resolve issues quickly. Employees are expected to communicate any workplace issues with Glad Group and refrain from raising concerns directly with its customers unless authorised to do so.

Related Policies

- Grievance Resolution policy

4.15. General Obligations

All employees must comply with:

- All state, federal, commonwealth and international legislations and regulations including but not limited to Fair Work, anti-discrimination, work health and safety and human rights legislation.
- Obligations and requirements within your contract of employment.
- Policies and procedures of Glad Group and its customers.
- Lawful directions made by a person with appropriate authority including but not limited to police and WorkSafe inspectors.
- Lawful and reasonable directions made by the Company.

5.0. RELATED POLICIES

- As specified under each section.

6.0. LOG OF CHANGE

DATE	AMENDMENTS	AMENDMENTS BY	REVISION
30/03/2023	General updates	Ann Shanahan	2
14/04/2025	Minor Amendments, new section 4.14 Workplace Communication	Ann Shanahan	3

Authorised by:



Kiri Chase
Head of People & Culture

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