SOCIAL COMPLIANCE POLICY

1.0. PURPOSE

This policy outlines Glad Group's commitment to social responsibility and provides a framework for ensuring that all business operations, including those of our suppliers and partners, adhere to the highest social and ethical standards.

This policy aims to foster a safe, fair, and respectful working environment and to promote ethical business practices throughout Glad Group's supply chain.

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 t/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 t/as **Unifyd Technology** | 55 627 094 366
- **Australian Protective Services Pty Ltd** | 47 610 471 424

It aims to cover all aspects of Glad Group's operations, including but not limited to workplace conditions, human rights, labour practices, and environmental control.

This policy must be read in conjunction with other Glad policies as outlined in but not limited to section 4.0 related policies and procedures.

3.0. POLICY STATEMENT

Glad Group is committed to maintaining the highest standard of social responsibility and ethical conduct across all our operations. This policy reflects Glad Group's dedication to ensuring that our business practices not only comply with applicable laws and regulations but also uphold the principles of trust, respect and integrity.

3.1. Modern Slavery and Human Rights

The Glad Group workforce is represented by many nationalities with diverse backgrounds. Glad Group's commitment to human rights and the abolition of modern slavery is embedded in policies, systems, procedures and action plans that support the day-to-day operations.

Forced Labour

Glad Group does not condone or engage in forced, bonded, or involuntary labour. To identify and ensure that forced labour does not occur, Glad is committed to understanding activities occurring within the supply chain.

Glad Group's commitment:

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- all work must be performed voluntarily, and employees can start and leave their employment at their own free will
- employees have the right to speak up about their work conditions without threats of reprisal
- employees can refuse to work overtime that unreasonably exceeds the maximum weekly hours without the risk of threat of a penalty, for example threats of dismissal or threats of reduction in shifts for refusing such overtime
- ensure that employees are provided with information about their employment rights and obligations
- employees are paid in accordance with their applicable industrial instrument and are provided with payslips as per regulatory requirements
- not deliberately delay or withhold wages as a form of punishment
- not engage directly or indirectly in cash in hand, cash payments or paid-in-kind (for example goods) to employees, suppliers, sub-contractors or customers for work undertaken
- not engage directly or indirectly in debt bondage or cash back schemes with employees, suppliers, sub-contractors or customers
- not retain employee's original personal documents such as but not limited to passports.

Child Labour

Glad Group defines child labour as per the International Labour Organization (ILO):

- work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development

It refers to work that:

- is mentally, physically, socially, or morally dangerous and harmful to children
- interferes with their schooling by:
  - depriving them of the opportunity to attend school
  - obliging them to leave school prematurely
  - requiring them to attempt to combine school attendance with excessively long and heavy work

Glad Group strictly prohibits the use of child labour under any circumstance and generally does not employ anyone under the age of 18 years. Glad Group will comply with all relevant laws and regulations regarding the minimum age for employment. Age is verified as part of the recruitment process.

Migrant Workers

Visa holders and migrant workers have the same workplace entitlements and protections as domestic employees, regardless of their migration status. Glad Group must comply with immigration laws including rules for work visas and working rights.

There may be times when a migrant worker does not comply with their visa conditions or is in breach of migration laws. A breach of visa conditions or migration law does not however affect the validity of an employment contract.

Glad Group will not exploit any person because of their migration status including but not limited to:

- coerce or pressure a temporary visa holder to breach a work-related visa condition

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- coerce or pressure a non-citizen without a valid visa to accept or agree to a work-related arrangement
- use an employee's temporary visa status to exploit them in the workplace
- pay or process wages any differently to that of domestic employees

Identity and Immigration Documents

Glad Group has an obligation to ensure that employees are eligible to work. Therefore, Glad Group must sight appropriate documentation such as but not limited to birth certificate, visa details or passport to verify working rights (both prior and during employment). Glad Group will, however, never request employees to provide original documentation or hold an employee's original documentation.

Should an employee not be able to provide evidence of their eligibility to work when asked to do so, the employee cannot continue to work. Under these circumstances the employee may utilise their leave entitlements or leave without pay until such time suitable evidence has been obtained and shared with Glad Group. People and Culture will verify the documentation before the employee can return to duties.

3.2. Employment

The Fair Work Act 2009 is the primary federal legislation governing employment in Australia, and it applies to Glad Group and its employees including migrant workers. It sets out but is not limited to minimum terms and conditions of employment such as:

- wages
- leave entitlements
- hours of work
- termination of employment

Recruitment

Glad Group generally does not engage third party recruiters for recruitment purposes within its site operations however should this occur, Glad Group will pay all recruitment fees. First and foremost, Glad Group expects that applicants receive a free service, and Glad Group pays the recruitment fees. Glad Group is committed to identifying whether applicants are receiving a free service prior to engaging a third-party provider by way of requesting this information from the provider prior to entering an engagement and/or during interview stages with applicants.

Employment Contracts

All employees must be provided with a written employment contract outlining the terms and conditions of employment at the time of commencing with Glad Group. Employees have the right to access their employment contract at any time. The employment contract cannot leave employees worse off than the minimum legal or industrial entitlements whichever is the highest. The employment contract must include, but is not limited to:

- employing legal entity including ABN
- commencement date
- employment type
- position title
- industrial instrument
- work location
- ordinary hours of work

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- remuneration
- notice of termination/resignation
- superannuation guarantee

Independent Contractors

Glad Group is committed to maintaining clear and compliant employment relationships and prioritises transparency and integrity in all business practices, including the engagement of independent contractors.

As a general practice Glad Group does not engage individuals as independent contractors.

Glad Group will not:

- engage in any form of sham contracting
- represent to an employee that they are a contractor when the Company does not reasonably believe this
- knowingly make a false statement to convince an employee to become a contractor to do the same work (or mostly the same work)

Pay Secrecy

Glad Group does not condone pay secrecy and employees have the right to share or not to share information about their pay and employment terms and conditions with other employees. Employees cannot be forced to give this information to another employee if they don't want to and employees can also exercise these rights post-employment.

Equal Employment Opportunity (EEO)

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.

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

3.1. Fair Wages and Entitlements

Glad Group is committed to providing fair wages and entitlements in accordance with the National Employment Standards (NES) or applicable instrument, whichever is the highest. Payment of wages will be provided in accordance with the applicable instrument or the Fair Work Act 2009 for award free employees, generally weekly or fortnightly.

Employees will be informed of their wages and entitlements by way of payslips and employment contracts.

Employees must be paid money for all work undertaken and cannot be 'paid in-kind' (for example, with goods such as food). Glad Group does not allow for wages to be paid cash-in-hand and wages are paid via electronic funds transfer.

3.2. Discrimination and Bullying and Harassment

All employees have the right to equality, non-discrimination and a workplace free from bullying and harassment.

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Non-Discrimination

No employee will be subjected to any form of discrimination based on but not limited to

- gender
- race
- religion
- age
- disability
- sexual orientation
- nationality, ethnic or social origin
- political opinion
- social group
- experiencing (or having experienced) family and domestic violence

Bullying and Harassment

Glad Group is dedicated to maintaining a workplace free from harassment, abuse, or intimidation. All employees have the right to work in an environment that respects their dignity and personal well-being.

Glad Group has zero tolerance against discrimination, bullying and harassment including sexual harassment. Any reported concerns or allegations will be taken seriously and handled with sensitivity and sympathetically. Every case will be dealt with on its merits and Glad Group will take appropriate, proportionate and timely action.

3.3. Freedom of Association

Glad Group respects and promotes freedom of association for all employees including the right for employees to:

- collectively bargain
- to form and join an association such as a trade union
- assemble peacefully

Any limits by Glad Group must be lawful and necessary in the interests of national security or public safety, public order, the protection of public health or morals, or the protection of the rights and freedoms of others.

Glad Group will not treat employees differently because of their membership of a lawful group or association such as a trade union.

Employees:

- are entitled to meet with union representatives during work hours
- have the right to have the union or other support person present during disciplinary meetings with Glad Group

3.4. Health and Safey

Glad Group is committed to providing a safe and healthy working environment. Glad Group will adhere to all applicable health and safety laws and regulations and ensure that appropriate measures are in place to protect employees from workplace hazards.

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Glad Group will implement and maintain effective procedures for dealing with emergencies and ensuring the safety and well-being of its employees.

3.5. Labour Hire

Glad Group expects that all vendors and sub-contractors will pay their employees in accordance with the applicable regulatory requirements relating to minimum wage, overtime, maximum work hours, and any other conditions of entitlements. Glad furthermore expects that there will be no cost to employees of the sub-contractor for placing them on a Glad site.

Glad Group may from time to time undertake audits on its sub-contractors to ensure that employees are treated fairly. This can include but not be limited to:

- request for timesheets and payslips
- request for employment contracts
- interview sub-contractor employees
- engage an external auditor firm to conduct the audit

3.6. Environmental and Community

Glad Group takes a proactive stance regarding environmental and community issues through its business practices. As responsible corporate citizens, Glad Group aims to conduct business with organisations who share our commitment to the community and the environment.

3.7. Ethical Business Practices

Glad Group is dedicated to conducting business with the highest ethical standards. Glad Group's commitment to ethical practices underpins our relationships with customers, employees, suppliers, and the communities we serve.

Glad Group upholds integrity and honesty in all business dealings. Glad Group and its employees are expected to:

- communicate transparently and truthfully
- avoid conflicts of interest and disclose any potential conflicts to management
- refrain from engaging in any form of deception or fraud

Glad Group is committed to full compliance with all applicable laws, regulations, and industry standards. Glad Group and its employees are expected to:

- stay informed about relevant laws and regulations affecting work
- report any suspected violations of laws to the appropriate authorities

3.8. Grievance Procedure

Glad Group promotes a Speak Up culture and encourages all employees, contractors, suppliers and partners to report grievances and 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

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If there is a reason to believe that anyone covered by this policy has failed to comply with the policy, Glad Group 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
October 2024	Initial Policy	Ann Shanahan	1

5.0. RELATED POLICIES AND PROCEDURES

- Glad Group Code of Conduct
- human rights policy
- equal employment opportunity and anti-discrimination policy
- supplier code of conduct
- procurement policy
- anti-bribery, fraud and corruption policy
- diversity policy
- environmental policy
- WHS policy
- whistleblower policy
- remuneration policy
- bullying and harassment policy
- social sustainability and community engagement policy
- conflict of interest policy

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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