WHISTLEBLOWER POLICY

1.0. SCOPE

This Policy is applicable to all Workers (including employees, contractors, and volunteers) of Glad Group.

Glad Group, comprising of:

- **Glad Group Pty Limited** | ABN 62 092 928 115
- **Glad Cleaning Service Pty Limited** | ABN 43 054 617 891
- **Glad Security Pty Limited t/as Glad Group Services** | ABN 122 097 590
- **Glad Maintenance Pty Limited** | ABN 85 127 522 481
- **Glad Indigenous Pty Limited** | ABN 13 648 519 957
- **Auxus Pty Limited** | ABN 12 655 147 292
- **Stratium Global Pty Ltd trading as Unifyd Tech** | ABN 55 627 094 366
- **Glad Group NZ Limited** | NZBN 9429 047 106 437
- **Australian Protective Services Pty Ltd 47 610 471 424**

2.0. PURPOSE

Glad Group is committed to operating legally, properly and ethically. We are focused on detecting and eliminating misconduct and promoting and supporting a workplace and relationships that drive our values of trust, respect and integrity. This means creating a culture where people are comfortable to speak up. We will not tolerate victimisation of anyone who intends to report or has reported non-conformance or misconduct.

3.0. OBJECTIVES

The objectives of this policy are to encourage people to make a report about potential non-conformance and misconduct and ensure that these reports are properly and lawfully dealt with, supporting and protecting the confidentially of all parties involved.

4.0. WHAT SORT OF CONDUCT CAN I REPORT UNDER THIS POLICY?

It is not possible to provide an exhaustive list of the activities that can be reported for the purposes of this Policy.

Non-conformance include but not limited to:

- Not operating to Glad Group's Quality, Safety and Environmental Standards.
- Not following or applying a policy or procedure as expected.

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Misconduct include but not limited to:

- Dishonest, corrupt, fraudulent or illegal conduct.
- Conduct or behaviour which could give rise to significant risks to health and safety.
- Inappropriate or unethical conduct.
- Breaches of the Corporations Act, or other financial sector laws enforced, for example, by ASIC.
- Bullying, discrimination or other unacceptable behaviour.
- Victimising someone for making a report.

5.0. WHAT SORT OF CONDUCT IS NOT INCLUDED UNDER THIS POLICY?

The protections under the Whistleblower Laws do not apply to typical workplace grievances. If you have a personal employment matter, please talk to your manager, seek advice from People and Culture gladacademy@gladgroup.com.au or contact the Fair Work Ombudsman (FWO) via their website https://fairwork.gov.au or call 13 13 94.

Examples of matters that are not Whistleblower matters are:

- A decision related to your employment, such as transfer, promotion, disciplinary action or termination.
- A decision related to the terms and conditions of your employment.
- Conflict between you and another employee.
- If you are unsure about this, please contact one of Glad Group's Whistleblower Disclosure Officers (WDOs) whose details are set out below. In addition, you can contact the FWO for information about workplace rights and obligations.

Whistleblowing is a constructive process and should be used as a last resort, when other reporting systems have been exhausted or are not effective, or where anonymity in reporting is desired.

6.0. AM I ELIGIBLE TO REPORT NON-CONFORMANCE OR MISCONDUCT? IF SO, HOW DO I DO THIS?

This Policy applies to an individual who is (or has been):

- An employee, contractor or subcontractor of Glad Group.
- A supplier of goods and services to Glad Group and that supplier's employees.
- A relative, spouse or dependent of anyone listed above.

If you do not feel able to use alternative reporting channels due to the nature and/or seriousness of the non-conformance or misconduct, Glad Group has a number of ways in which reports can be made. These include:

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Directly to one of Glad Group's WDOs.

Name	Position	Location
Hardeep Kaur	Business Support Manager	3 Garnet Street, Rockdale NSW 2216
Trevor Lewis	Operations Manager	3 Garnet Street, Rockdale NSW 2216
Brianna Taylor	Head of Strategic Growth	3 Garnet Street, Rockdale NSW 2216
Ann Shanahan	Manager People & Insurance	3 Garnet Street, Rockdale NSW 2216

If for any reason you do not want to make a report internally, you may do so through Glad Group's independent Whistleblower service provider, via the phone contact details provided below.

7.0. HOW DO I MAKE AN ON-LINE REPORT VIA THE INDEPENDENT WHISTLEBLOWER SERVICE PROVIDER?

To make an **Online** report please click on the **"Make a Report"** link below. You will be redirected to the new page where you need to enter '**GLAD2021**' in the "Unique Key" field. Click on **"next"** and follow the prompt. You will then be asked for your **"Client Reference Number"** that is **"GladGroup21"**.

Glad Group | whistleblowingservice.com.au

8.0. HOW DO I MAKE A PHONE REPORT VIA THE INDEPENDENT WHISTLEBLOWER SERVICE PROVIDER?

To make an **Phone** report please call the following numbers:

- Australia – 1300 687927.
- New Zealand – 0800 687927

You will be asked to supply the same information to validate your report. When asked for the **"Unique Key"** please state **"GLAD2021"** to the support person. The support person will then ask you for your **"Client Reference Number"** that is **"GladGroup21"**.

9.0. WHAT HAPPENS WHEN I LODGE A REPORT?

When you lodge a report, you will be provided with your own unique reference number which will be up to 20 characters long. Please keep a record of the unique reference number. It will be important if you wish to resume a report, upload more information for your report or monitor progress of your report.

If I speak up, do I have to identify myself?

No. You can remain anonymous if you want to.

If I make a report, how will it be dealt with?

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9.1. Provision of Information

Information received will be kept confidential to the extent possible, subject to Glad Group's escalation and reporting processes and to meet Glad Group's legal obligations. If you have not consented to your identity being disclosed, your identity will not be shared. All records produced by Glad Group as part of receiving or investigating a report will be securely retained with access restricted.

By making a report, you consent to your information being collected and reported in accordance with the procedures set out above.

9.2. Investigation

Following a report, the sWDO will assess and use the information provided in the report to decide the best action to take. This may result in a request for further information or an investigation of:

- Systems issues
- Personal conduct
- Processes breaches

An appropriate investigative lead who is either internal or external will be appointed.

Investigations will be conducted in a fair and objective manner, including external parties where appropriate and will be initiated and progressed as quickly as practicable. Once an investigation of a Report has been completed, the findings will be provided to the Glad Group Governance Committee.

9.3. Possible outcomes of an investigation

Where an investigation confirms policy or systems breaches, misconduct or an improper state of affairs, Glad Group will take appropriate action in relation to anyone found to have acted improperly and will provide recommended steps that should be taken to the Governance Committee to reduce the risk of recurrence. Where a person or persons have been found to be a victim of improper conduct, appropriate steps will be taken to remediate any losses and/or provide support as appropriate.

9.4. Internal reporting

Reports to the Governance Committee will include:

- All relevant facts.
- Whether the report is proven, not proven or otherwise.
- Recommendation/s, as to any action that may be taken in respect of the findings.

Reports will not contain any information that could lead to your identification if you have requested anonymity.

9.5. External reporting

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Glad Group will refer to relevant external agencies (such as the police or ASIC), information in a whistleblower report and the findings of an investigation which have revealed conduct that may constitute a legal or criminal offence or where there is a legal obligation to do so.

What will happen to me if I do Speak Up?

Any person making a report shall not suffer any sanctions from the Company provided that their actions:

- Are in good faith, and
- Are based on reasonable grounds.

Glad Group will treat reports in the strictest confidence. All reports and records relating to a report will be stored securely and able to be accessed only by authorised staff.

Glad Group will do everything reasonably possible to support and protect from victimisation or detrimental treatment, anyone who:

- Intends to or actually makes a report.
- Is mentioned in a report.
- Acts as a witness.
- Otherwise assists with the investigation and resolution of the report.

Glad Group will thoroughly investigate reports of victimisation or detrimental treatment of Whistleblowers. If proven, those who have victimised others may be subject to disciplinary action in line with Glad Group's policies.

Victimisation is an offence under Whistleblower Laws and carries serious penalties.

Glad Group is also committed to providing appropriate support to Whistleblowers. The nature of the support will depend on the misconduct that is reported and the circumstances of the person making the report. For example, confidential assistance is available through Glad Group's Employee Assistance Program to those employees making, mentioned or involved in a report.

All reasonable steps will be taken by Glad Group to ensure that you do not suffer detrimental treatment as a result of speaking up.

What information should I provide?

We do not expect an initial report to include absolute proof of misconduct. You will be asked to provide information such as:

- The name, job title and workplace address of the person who is the subject of the report.
- Details of the misconduct including dates and places.
- Names of anyone who may substantiate the report.
- Any other evidence that supports the report such as email, documents etc.

These details will assist us in deciding how best to deal with the report.

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10.0. WHAT IF A REPORT HAS BEEN MADE AGAINST ME?

Unless and until an allegation is proven, any persons accused are entitled to a presumption of innocence and will be treated accordingly.

11.0. WHAT ARE THE CONSEQUENCES OF MAKING A FALSE REPORT?

Where it is found that a person has knowingly or recklessly made a false report of misconduct, that of itself will be considered a serious matter and will render the person concerned subject to disciplinary action, which may include dismissal. The type of disciplinary action will depend on the severity, nature and impact of the false report.

12.0. MONITORING AND REPORTING OF WHISTLEBLOWER REPORTS

The WDO will provide high level updates to both the Governance Committee and the Senior Leadership. All updates will maintain the confidentiality of the Whistleblower.

13.0. WHERE CAN I GET INFORMATION AND ADVICE?

If you need information and advice about making a report or the support and protection available, you may discuss the matter in confidence with one of the WDOs or you can contact our external provider on the phone contact details provided above.

14.0. WHAT DO I DO IF THE MATTER IS URGENT?

If the matter is urgent, please contact a WDO whose details are included within this policy.

15.0. LOG OF CHANGES

DATE	AMENDMENTS	AUTHORISED BY	REVISION
May 2014	Initial Policy	Nick Iloski	1
February 2021	General updates	Ivana Iloski	2
October 2022	General updates	Kiri Chase	3
February 2024	New WDOs	Ann Shanahan	4

16.0. RELATED POLICIES

- Code of Conduct
- Grievance Resolution Policy
- Bullying and Harassment Policy

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- Anti-bribery, fraud and corruption Policy

Authorised by:



Kiri Chase

Head of People and Culture

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