Workplace Surveillance Policy

1. Purpose

The purpose of this policy is to outline the circumstances in which Glad Group may conduct workplace surveillance and to ensure that any surveillance undertaken is carried out in a lawful, transparent and reasonable manner. Workplace surveillance is used to support the safety and security of employees, customers and members of the public, to protect Glad Group's assets, information and systems, and to assist in meeting operational, contractual and regulatory obligations.

This policy provides employees and other users with clear information about the types of surveillance that may occur in the workplace and the reasons for it.

In addition, this policy sets out the responsibilities of users in relation to workplace surveillance and makes it clear that no employee or other person may conduct surveillance in the workplace unless it is authorised by Glad Group and permitted by law.

2. Scope

The workplace surveillance 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** | 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

This policy applies to all employees, consultants, contractors and outsourced service providers (users) performing work for and behalf of Glad Group.

3. Policy Statement

Glad Group conducts workplace surveillance in accordance with the Workplace Surveillance Act 2005 (NSW), the Privacy Act 1988 (Cth) and any other applicable state and federal legislation.

Workplace surveillance is undertaken for legitimate business purposes, including but not limited to:

- protecting the health and safety of employees, customers and members of the public
- safeguarding Glad Group assets, equipment, systems and information
- ensuring service delivery and meeting contractual and regulatory obligations
- detecting, investigating and preventing misconduct, unlawful activity or serious breaches of Glad Group policies and procedures
- supporting operational management, workforce planning and quality assurance

Glad Group is committed to ensuring that workplace surveillance is:

- carried out in a reasonable and proportionate manner
- conducted with appropriate notice where required by law
- limited to what is necessary to achieve a legitimate business purpose
- managed in accordance with Glad Group's privacy, confidentiality and information security obligations

Workplace surveillance may include computer surveillance, camera surveillance and tracking surveillance as described in this policy.

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Information obtained through workplace surveillance will only be accessed by authorised persons and may be used for operational, safety, compliance, performance management, misconduct investigations and disciplinary purposes in accordance with applicable legislation and Glad Group policies.

Glad Group prohibits employees and other users from conducting any form of surveillance in the workplace unless expressly authorised and permitted by law.

3.1. Computer Surveillance

Glad Group is committed to meeting its statutory obligations under applicable legislations and regulations and this policy represents formal notification to users about activities of Glad Group that fall within the definition of computer surveillance.

Glad Group may at any time conduct computer surveillance of all user devices that access the Glad Group Information Systems for the purpose of:

- Protecting its assets, property and finance from suspected unlawful activities or activities
- Conducting its business and operational requirements
- Protecting its reputation
- Compliance with legislative requirements
- Meeting the expectations of stakeholder and the general public

Computer surveillance will be carried out by all means available including but not limited to:

- accessing Glad Group email accounts or emails, files, work computers, including activity logs, recording internet usage (including sites and pages visited, files downloaded, video and audio files accessed and data input) and
- accessing these records, telephone usage logs, personal devices that have been used to conduct Glad Group business.
- records of use of security cards, mobile devices, smart-phones and other electronic devices, created, modified, sent, received or stored using electronic resources.

Users acknowledge that computer surveillance may prevent delivery of an email sent to or by a user, access to internet websites and access to software applications.

3.2. Camera/Video Surveillance

Glad Group premises and customer sites at which users may be required to work, may carry out overt camera surveillance of its operations and equipment throughout the premises. Camera surveillance is primarily carried out for the purpose of ensuring the security of the workplace premises, equipment and persons in the workplace. However from time to time camera surveillance may occur for non-security related reasons.

Where camera surveillance is to take place, the cameras and/or camera casings should be clearly visible. Signs will be installed at the entrance(s) to the area being surveilled to notify people that they may be under camera surveillance. Such camera surveillance may be intermittent and ongoing.

It is not acceptable that an employee record, film, tape or photograph another employee or a customer in the workplace without their expressed consent, which includes Glad Group's and customer premises.

3.3. Tracking Surveillance

A number of Glad Group vehicles and equipment may be installed with an electronic tracking device (such as a Global Positioning System) with the primary purpose to determine and record the geographical location or movement of the person, vehicle or equipment in which it is installed.

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Where a tracking device is installed in a vehicle or other piece of equipment, the vehicle or piece of equipment will be marked with a sticker indicating that the vehicle or piece of equipment is the subject of tracking surveillance.

Tracking surveillance of Glad's vehicles and equipment is intermittent and ongoing.

Where other devices, including but not limited to Glad Group mobile phones, come with a Tracking device automatically installed, Glad will notify the employee of the tracking device.

3.1. Lighthouse, Daelibs and Other Similar Systems

Glad Group utilises Lighthouse and Daelibs (as amended from time to time) as the workforce tracking solution at customer sites to provide evidence of services performed for the purpose of meeting contractual obligations. Logging in to Lighthouse is a requirement for all Glad Group onsite employees. Data gathered from Lighthouse is primarily used for:

- Ensuring service obligations are meet
- Workplace safety risk and compliance

Tracking is conducted using Glad Group's issued devices and employees are not to use personal devices. Tracking is performed when employees sign into the lighthouse application during their rostered shift. Upon the shift ending and signing out of the application, tracking will cease.

No tracking is performed using personal devices unless the employee installs the application and therefore provides the application the necessary permissions to track.

Glad Group reserves the right to use the tracking data for other purposes as required.

4. Related Policies, procedures and guidelines

- Glad Group Code of Conduct
- Confidentiality Policy
- Mobile Device and Service Usage Policy
- Social Media Policy
- IT Acceptable Use Policy

5. Contact for questions

People and Culture, gladacacemy@gladgroup.com.au

6. Log of change

Date	Amendments	Authorised by	Revision
November 2014	New Policy	**Nick Iloski**	1
March 2026	General Policy Updates	**Ann Shanahan**	2

Authorised By:

Riccardo Furnari

National Technology & Transformation Manager

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