



ANTI-BRIBERY, FRAUD AND CORRUPTION POLICY

1.0. PURPOSE

Glad Group is committed to creating and maintaining a culture of corporate compliance and ethical behaviour in which employees are responsible and accountable, behave with honesty and integrity and are able to raise any concerns regarding unethical, unlawful or undesirable conduct, without fear of reprisal.

Fraud and/or corruption in all forms, including bribery, are behaviours that are contrary to Glad Group's values and culture. Glad Group is actively committed to preventing fraud and corrupt conduct throughout the organisation.

We expect that all of our people to do the right thing and comply with applicable laws, codes and policies. Glad Group with zero tolerance and prohibits bribery, corruption, fraudulent or dishonest conduct. This policy provides information and guidance on how to recognise and deal with bribery, corruption and fraud issues.

This policy forms part of Risk Management Framework.

2.0. SCOPE

This policy applies to all Glad Group employees (whether permanent, fixed -term or temporary) including the Directors of all Glad Group entities, in relation to their employment with Glad Group.

3.0. DEFINITIONS

For the purposes of this policy:

- A Bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage and can take the form of gifts, loans, fees, rewards or other advantages.
- Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust.
- Corruption is a dishonest and intentional activity in which a person acts against the interests of Glad Group and abuses their position of trust in order to achieve personal gain for themselves, another person or entity. Examples include:
 - The deliberate falsification, concealment, destruction or use of falsified documentation;
 - The improper use of information or position;
 - Theft of cash;
 - Accounting fraud (for example, false invoicing);
 - Giving or taking bribes or secret commissions or improperly accepting gifts;
 - Using Glad Group intellectual property, information or resources (including computers) for personal gain;
 - Theft or misuse of Glad Group assets, equipment or facilities;
 - Use of Glad Group corporate credit card for personal expenses;
 - Not disclosing conflicts of interest; or
 - Improper conduct in procurement and/or contract management processes.
- Facilitation Payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, e.g. Processing papers, issuing permits and other actions of an official in order to expedite performance of duties of a non-discretionary nature (i.e. which they are already bound to

perform).

- Fraud is a dishonest and intentional activity committed to secure an unfair or unlawful personal gain, regardless of whether or not deception is used.
- Immediate Family means your spouse or de facto partner, child, father, mother, brother or sister or other relative who customarily seeks your advice, or acts on your recommendation, in financial matters.
- Personal Benefits include any type of gift, favour, service, invitation or anything of monetary value received from a client/service provider or any individual or organisation doing or seeking to do business with Glad Group.
- A Sanctions Law is one which restricts trade or prohibits other transactions with particular countries, individuals or entities and which has been imposed by Australia, the United Nations or by any country with which Glad Group does business.

4.0. WHAT WE REQUIRE OF YOU

4.1. Bribes

You are not permitted to give, promise, accept, request or authorise a Bribe, whether directly or indirectly on behalf of, or for the benefit of Glad Group, or in any way in connection with your employment at Glad Group.

It is irrelevant whether the Bribe is accepted or ultimately paid. Merely offering a Bribe will be a contravention of this policy.

4.2. Facilitation Payments

You are not permitted to give, promise or authorise a Facilitation Payment, whether directly or indirectly on behalf of, or for the benefit of Glad Group or in any way in connection with your employment at Glad Group.

It is irrelevant whether the Facilitation Payment is accepted or ultimately paid. Merely offering a Facilitation Payment will be a contravention of this policy.

4.3. Personal Benefits: Gifts and Entertainment

If permitted under this policy, you may receive gifts or attend legitimate business functions or events sponsored by clients or service providers, or potential clients or service providers. The general principle applying to offers of gifts and entertainment is that there must not be any reasonable likelihood of, or a perceived likelihood of, improper influence on the performance of your duties as a Glad Group employee.

Glad Group's policy relating to Personal Benefits applies to you and your Immediate Family.

4.4. What personal benefits are prohibited?

You must not request or solicit a Personal Benefit from clients/service providers.

You must not give or accept cash payments, discounts or cash equivalents (including gift vouchers and gift certificates).



You must not accept a Personal Benefit from a supplier when you and the supplier are directly or indirectly involved in a sourcing event to select a supplier to deliver goods or services to Glad Group (e.g. during a tender process).

You must not accept or retain a Personal Benefit unless it is:

- Normal business entertainment (e.g. a meal, tickets to theatre, sporting events etc.)
- An appropriate gift or personal benefit given on a festive occasion under customary practice.

You must not give or accept a Personal Benefit if there is a reasonable likelihood, or a perceived likelihood, of improper influence on your performance of your duties.

4.5. Accepting and declaring personal benefits

In the course of your work for Glad Group, you may at times be offered gifts or hospitality (eg. food, drinks, entertainment) that help encourage good working relationships with clients and service providers. You are generally permitted to accept modest gifts and offers of work-related hospitality. These do not need to be declared, unless they are excessive, regular or frequent. As a guide, a third or subsequent Personal Benefit from the same client/supplier within a calendar year is considered frequent.

If you receive or are offered a Personal Benefit valued at, or that may be perceived to be valued at, over \$250, you must seek the approval of your manager and the COO before accepting it. The COO will, in consultation with your manager, determine whether the benefit may be accepted or whether it should be returned/rejected.

Where time away from the office during normal business hours is associated with a Personal Benefit, e.g. golf or sailing day, this must be approved by your manager.

If an offer of a Personal Benefit includes travel or accommodation, this should be made clear in your application for approval.

If you are aware that a Personal Benefit you have received, or have been offered, has also been received by, or offered to, multiple employees by the same donor, your manager should be advised of this.

4.6. Reporting personal benefits

If the COO determines that you may accept a Personal Benefit valued at, or that may be perceived to be valued at, over \$250, you must record details of the Personal Benefit in the Conflict of Interest/Personal Benefits Register using the [Conflict of Interest/Personal Benefit Declaration Form](#).

The Group Compliance Manager reports the Conflict of Interest/Personal Benefits Register to the Sustainability and Risk Committee.

If it is determined that you cannot accept a Personal Benefit:

- You must return or refuse it immediately with an explanation that acceptance of the benefit would be contrary to Glad Group's Code of Conduct.
- You should explain the situation as tactfully and courteously as possible and take all steps to ensure that no offence is taken by the donor.
- In some circumstances it may not be practicable to return a gift. In these circumstances, the gift will be donated to a nominated charity or made available to all employees.



4.7. Political Donations

Glad Group does not make political donations. We aim to engage with government in a bipartisan, ethical and open way to meet the objectives of the Group, the property industry and the community. The [Government Relations Policy and Protocols](#) must be complied with in all dealings with government.

You must not attend political fundraisers as a representative of Glad Group. If you need guidance on whether an event constitutes a political donation or fundraiser, or whether a political party may use Glad Group's property for political purposes, contact the Head of Investor Relations and Corporate Affairs.

If you participate in political activities and/or advocacy, including making political contributions in your own name, you must ensure that you comply with this Code and the [Government Relations Policy and Protocols](#).

4.8. Prohibition on breach of Sanctions

Glad Group prohibits the making of any payment or engaging in any transaction that is in breach of any Sanctions Law. This includes:

- The providing or receiving of any payment, other benefit, goods or service, directly or indirectly, to or from any individual or entity that is subject to a Sanctions Law;
- Any activity in connection with a designated country, where that activity is prohibited by a Sanctions Law;
- Encouraging, permitting or otherwise allowing any person or entity acting on behalf of Glad Group to engage in any conduct or transaction that is prohibited by a Sanctions Law; and
- Any measure intended to circumvent prohibitions imposed under a Sanctions Law.

Glad Group also prohibits engaging or continuing to engage with a third party where it is expected or likely that the nature of that engagement may breach a Sanctions Law.

Sanctions are subject to frequent change. If you are uncertain whether a Sanctions Law applies in a particular situation you should consult with the Risk and Compliance Manager.

5.0. HOW TO RAISE A CONCERN

If you become aware of behaviour contrary to this policy, you should report this inappropriate behaviour as soon as possible. You are encouraged to speak to your Manager, however you may also contact the Head of Risk and Compliance Manager, Head of People and Culture. Where a Manager receives a report they must inform the Head of Risk and Compliance.

If you do not feel able to use the existing reporting channels due to the nature and/or seriousness of any inappropriate behaviour or you wish to remain anonymous, there are a number of channels for you to make a report of suspected misconduct under our Whistle-blower Policy.

Glad Group promotes a culture that expects and encourages the reporting of improper conduct including fraud, bribery and corruption and is committed to protecting people who disclose reasonably suspected mismanagement, corruption, illegality, or some other wrongdoing occurring at Glad Group.



6.0. INVESTIGATION AND MANAGEMENT OF REPORTS OF INAPPROPRIATE BEHAVIOUR

The Head of Risk and Compliance Manager will determine the most appropriate approach for investigation of reports of inappropriate behaviour. Employees and Managers must not initiate their own investigation.

Where it is found that an employee has knowingly or recklessly made a false report of fraud or corruption, that conduct itself will be considered a serious matter and render the person concerned subject to disciplinary action as provided by the Code of Conduct.

7.0. WHAT HAPPENS IF I BREACH THIS POLICY?

Any breach of this policy will be viewed seriously by Glad Group. Outcomes could include disciplinary action and termination of your employment with Glad Group.

Glad Group may also decide to bring civil proceedings and/or refer for criminal prosecution. Where appropriate, Glad Group will vigorously pursue the recovery of money or property lost through fraud or corruption, including bribery.

8.0. ROLES AND RESPONSIBILITIES

Governance Committee

The Governance Committee is responsible for ensuring there is an appropriate approach to fraud and corruption prevention in place and for receiving regular reviews of this policy.

Head of Risk and Compliance Manager

The Head of Risk & Compliance Manager is responsible for establishing a fraud and corruption prevention framework including:

- Regular review and communication of this policy;
- Development and maintenance of an anti-bribery, fraud and corruption plan; and
- Maintenance of appropriate insurance protection arrangements.

The HRC is also responsible for co-ordinating investigations into allegations of bribery, fraud and corruption with assistance from the Risk and Compliance and People and Culture team where required and in consultation with senior management where appropriate.

The Head of Risk & Compliance Manager will report all suspected and actual instances of bribery, fraud and/or corruption to the Glad Group Governance Committee.

Risk and Compliance Manager

The Risk and Compliance Manager is responsible for maintaining the Conflicts of Interest/Personal Benefits Register and reporting it to the Governance Committee.



Line Managers

Line Managers are responsible for:

- Ensuring that employees in their team are aware of and comply with this policy and related policies and procedures and Glad Group internal controls and limits of authority.
- Dealing with breaches of this policy, or complaints about inappropriate behaviour quickly, effectively and confidentially.

Employees

Employees are responsible for:

- Complying with this policy, related policies and Glad Group internal controls including limits of authority;
- Raising concerns regarding improper conduct or inappropriate behaviour; and
- Co-operating with any investigations related to suspected breaches of this policy.

9.0. FURTHER INFORMATION

If you require additional information about this policy and/or you have any questions issues or concerns, please contact the Head of Risk & Compliance Manager.

10.0. RELATED POLICIES, PROCEDURES AND GUIDELINES

- Code of Conduct
- Delegations of Authority
- Personal Dealing Policy
- Procurement and Expense Policy
- Recruitment Policy
- Travel, Entertainment and Corporate Card Policy
- Supplier Code of Conduct
- Whistle-blower Policy