



# HUMAN RIGHTS POLICY

## 1.0. SCOPE

This policy applies to all Glad Group operations. It is also a reference position for stakeholders in our value chain, including customers, employees, suppliers, contractors and the broader community regarding our approach and expectations. Glad Group, comprising of:

- Glad Group Pty Ltd | ABN 62 092 928 115
- Glad Cleaning Service Pty Ltd | ABN 43 054 617 891
- Glad Security Pty Ltd trading as Glad Group Services | ABN 99 122 097 590
- Glad Maintenance Pty Ltd | ABN 85 127 522 481
- Glad Indigenous Pty Ltd | 13 648 519 957
- Auxus Pty Ltd | 12 655 147 292
- Stratium Global Pty Ltd trading as Unifyd Technology | 86 923 901 715
- Glad Group NZ Limited | NZBN 9429 047 106 437
- Australian Protective Services trading as APS Global | 47 610 471 424

## 2.0. PURPOSE

Glad Group believes that all people are entitled to basic rights and freedoms without discrimination. We recognise that the responsibility to respect human rights exists over and above compliance with national laws and regulations that protect human rights and extends to our own operations and across our value chain.

This policy articulates how Glad Group supports fundamental human rights as defined in the International Bill of Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work. It also details our alignment to the United Nations Guiding Principles on Business and Human Rights.

## 3.0. GENERAL PRINCIPLES AND COMMITMENTS

Glad Group is committed to upholding the human rights of our employees, customers, suppliers and other stakeholders.

We have a responsibility to:

- Avoid causing or contributing to adverse human rights impacts through our own activities and to address such impacts should they occur.
- Prevent or mitigate human rights impacts that are linked to our operations, even if we have not caused or contributed to these impacts.

In meeting our responsibilities, we are prioritising the human rights that are most relevant to our operations and supply chain, which we have set out below. We will review our priority human rights issues on an annual basis. We do not tolerate retaliation against human rights defenders who are acting to address human rights on behalf of individuals or groups.

Glad Group is committed to the following principles in both our own operations and supply chain:

- No child labour or forced labour is used, and that employment is freely chosen.
- Employees have fair wages and employment agreements and work hours do not exceed the maximum limit set by relevant legislation.
- Employees are free to exercise their right to form and/or join trade unions and to bargain collectively.
- Employees experience fair and equal treatment and access to opportunity and enjoy a work environment that is free of discrimination, harassment, intimidation or coercion.



- All employees' health and safety is protected in the workplace.
- Employees have access to fair procedures and remedies.
- Employees have a right to privacy.

These principles are relevant to us as an employer, purchaser of goods and services as well as being an active member of the communities in which we operate.

#### 4.0. IMPLEMENTATION AND REVIEW

Our commitment to human rights is embedded in the policies, systems, procedures and action plans that support our day-to-day operations.

Glad Group operates wholly within Australia and New Zealand where there are established legislative regimes relating to human rights including labour standards, privacy and anti-discrimination laws. We do not tolerate behaviour that is in breach of the law or our corporate policies. This helps us achieve our mission to engage and empower our people at all levels of the organisation to deliver sustainable service that will exceed our stakeholders' expectations and reflects our belief that all people are entitled to basic rights and freedoms no matter their origin, religion, race, gender or any other status.

Our commitment to human rights is implemented through a number of policies, procedures and structures:

- Our governance structure, corporate values and Code of Conduct require us to articulate and monitor the behaviour and conduct expected of all Glad Group directors and employees. This includes setting clear expectations through training at induction and throughout the careers of our people with the Glad Group's Environment, Social and Governance (ESG) Committee responsible for monitoring Glad Group's commitment to Human Rights and ensuring it is implemented consistently in line with this policy.
- Our approach to risk management and compliance: Glad Group has a comprehensive approach to risk management and compliance, which provides oversight and defines the processes for identifying, assessing, managing, mitigating and reporting on all material risks, including human rights related risks.
- Our approach to health and safety: Glad Group's Integrated Business Management System guides our approach to ensuring the health and safety of not only our employees but all of our stakeholders. This approach is certified to ISO45001:2018.
- Our people practices support workplace inclusivity. We are an equal opportunity employer that believes an engaged and diverse workforce is our greatest asset. We do not condone discrimination on the basis of protected attributes including, race, religion, national or ethnic origin, citizenship status, political opinion, age, marital or relationship status, carer responsibilities, sex, sexual orientation, gender identity, intersex status, pregnancy, parental status, breastfeeding, disability, veteran status, trade union activity or other legally protected status. We expect the same from all business partners, customers and suppliers.

Glad Group has representation of people from diverse backgrounds across our business and we are focused on ensuring that all our people feel supported. To this end we invest in the learning and development of our workforce, take a proactive approach to career pathway development and succession planning. We also support our workforce through a dedicated recognition and benefits program that has a positive impact of the lives of our employees.

- Glad Group is committed to respecting the rights of First Nations Peoples in line with the United Nations Declaration on the Rights of Indigenous Peoples. Our Reconciliation Action Plan commits us to embedding reconciliation in the delivery of core business and community engagement practices.



- The United Nations Guiding Principles on Business and Human Rights set out the key elements of human rights due diligence, including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses, and communicating how impacts are addressed.

Glad Group understands that human rights due diligence is an ongoing process – one which is most effective when it is embedded in the risk and procurement processes of our business. As such, we commit to implementing and updating appropriate systems and controls to identify and assess our human rights risks and integrate those findings to manage them effectively. We are committed to enhancing our capability to track the effectiveness of our responses and to communicating our human rights progress for external stakeholders, including our annual modern slavery statement, made in accordance with the Modern Slavery Act 2018 (Cth).

- The United Nations Guiding Principles on Business and Human Rights fundamentally acknowledge that grievance mechanisms must be known, trusted and accessible to those who need it. We maintain grievance and whistleblower mechanisms for stakeholders to raise concerns safely and confidentially regarding potential human rights impacts in our operations and supply chain. This enables the Glad Group to address potential issues swiftly and appropriately. Glad Group employees and external parties can confidentially report concerns about improper conduct by Glad Group or its suppliers through the whistleblower program.
- Our Supplier Code of Conduct articulates the behaviour and conduct expected of organisations that we engage to provide us with goods and services. We implement this through our Supplier Management Approach which focuses on the identification and management of potential risks and building strong and transparent relationships. We ask our suppliers to adopt similar principles with their key suppliers.
- Glad Group is committed to treating the right to privacy as a fundamental human right in line with the International Covenant on Civil and Political Rights. We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of Personal Information.
- We collaborate with community partners and organisations to build understanding and capacity, for example with the Cleaning Accountability Framework and United Nations Global Compact.

We understand that best practice engagement involves proactive efforts that go beyond grievance and whistleblower mechanisms. We use best endeavours to engage our own employees, our suppliers, and other stakeholders to better understand potential human rights impacts and increase awareness of human rights obligations.

*Resolution*

We will take appropriate action to cease or prevent adverse human rights impacts that we have identified or that have been brought to our attention. The appropriate action will depend on whether we have caused the impact, contributed to the impact, or are linked to the impact through our business relationships. In all cases, our focus will be on mitigating the risk to the individual(s) experiencing the impact and using our leverage to foster continuous improvement and appropriate remediation.

*Public reporting*

We communicate our human rights progress as required under the Australian Modern Slavery Act 2018 and also talk about salient human rights risks in our annual ESG Report.

**5.0. ROLES AND RESPONSIBILITIES**



The below table lists roles and responsibilities relevant to the policy and to related policy documents, including procedures, guidelines, frameworks or plans.

ROLE	RESPONSIBILITY
National ESG Manager	Oversight of human rights and modern slavery approach and activities, responsibility for external reporting.
Head of People & Culture	Establishment of policies, procedures and activities for the upholding of human rights for Glad Group employees.
Procurement Manager	Establishment of policies, procures and activities for the upholding of human rights in the supply chain.
National Risk & Compliance Manager	Establishment of policies, procedures and activities to ensure employee health, safety and privacy is protected in the workplace.
ESG Committee	Responsibility for the oversight and assessing the effectiveness of Glad Group's approach to human rights.
Governance Committee	Responsibility for oversight and assessing the effectiveness of Glad Group's approach to health and safety.

## 6.0. LOG OF CHANGES

DATE	AMENDMENTS	AUTHORISED BY	REVISION
1/9/20	Human Rights Commitment Finalised	Steve Iloski	1.0
30/06/22	Policy included in new template	Tara Matthews	2.0
30/03/23	Updated for feedback from stakeholders	Nina Collinson	3.0
3/05/23	Updated for feedback from internal stakeholders	Nina Collinson	4.0

## 7.0. RELATED POLICIES AND PROCEDURES

- WHS Policy
- Privacy Policy
- Diversity Policy
- EEO and Anti-Discrimination Policy
- Code of Conduct
- Supplier Code of Conduct
- Whistleblower Policy
- Procurement and Expense Policy

## 8.0. REVIEW OF THE POLICY

In line with our commitment to review our priority human rights issues on an annual basis, this policy will be updated accordingly.

## 9.0. CONTACT FOR QUESTIONS

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Authorised by:

Chief Executive Officer  
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