

# GLAD GROUP

## Modern Slavery Statement

FY2023



[gladgroup.com.au](http://gladgroup.com.au)

1300 283 233





Glad Group Services acknowledge the Traditional Owners of the land and pays respect to their Elders, ancestors, cultures and history.

We pay tribute to First Nations Peoples' resilience and culture. We acknowledge their continuing connection to the land upon which we all live, work and play.



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## 1. About this statement

The statement is submitted as a joint statement on behalf of the Glad Group of Companies (Glad Group), which includes Glad Group Pty Ltd, Glad Cleaning Services Pty Ltd trading as Glad Retail Cleaning, Glad Security Pty Ltd trading as Glad Group Services, Glad Maintenance Pty Ltd, Australian Protective Services Pty Ltd, Glad Group NZ Limited, Auxus Pty Ltd and Stratium Global Pty Ltd trading as Unifyd Technology.

This is Glad Group's fourth Modern Slavery Statement. This Modern Slavery Statement has been prepared to meet the mandatory reporting criteria set out under the Australian Modern Slavery Act 2018 (Cth) for the financial year ended 30 June 2023. It describes the steps taken by the Glad Group of companies to mitigate modern slavery in our business' operations and supply chains. This statement includes reference to actions undertaken prior to the FY23 reporting period to provide relevant context for our actions during the FY23 year.

### *Glad Group Advisory Board*

The Glad Group Advisory Board is responsible for the governance and oversight of all Glad Group of companies. These companies have a common set of:

- Governance policies and procedures
- Environment, social and governance (ESG) strategy and goals
- Risk management and compliance framework

The companies also share a Chief Executive Officer and Senior Management team who have been consulted and who have contributed to the preparation of this statement. Employees of these companies form part of the Glad Group of companies. As such, we have actively engaged and consulted with all companies in the development of this Statement. This includes reviewing details of the reporting requirements under the Modern Slavery Act 2018, requesting input and feedback and sharing information on progress and actions planned to address these requirements.

This statement was approved on 14 December 2023 by the Glad Group Advisory Board.



Nick Iloski

Executive Chairman

Glad Group Advisory Board



## 2. Foreword from Glad Group's Chief Executive Officer

At Glad Group we believe that everyone has a fundamental right to respect, dignity and safety at work. We continue to prioritise actions to minimise the potential risks of modern slavery occurring both within our own operations and supply chain, in line with a commitment to expand our due diligence activities on broader human rights issues. These issues were also identified as priorities for Glad Group to address in our recent materiality assessment of our 'A Force for Good' Environmental, Social and Governance (ESG) strategy review. I'm proud to share an update on the work we have done to understand the potential risks and the actions we have taken in this, our fourth Modern Slavery Statement.

Glad Group's value creation model is anchored in our purpose – we create welcoming experiences and safe places, every day. This provides the foundation for all our business practices and decision making, and supported by our environmental, social and governance strategy 'A Force for Good' that ensures we are focused on leaving a positive impact on stakeholders in the delivery of our services. Understanding and managing our potential modern slavery risks is a critical part of this commitment.

FY23 saw us build on the work we had done so far to develop a comprehensive and robust approach to addressing modern slavery. This includes completing our annual risk mapping for both our own operations and supply chain, which has been enhanced this year to ensure we have a more comprehensive understanding of our potential modern slavery risks. This has been particularly helpful for our procurement activities, guiding targeted engagement and conversations, as well as the introduction of assurance activities, with our higher risk suppliers. We are also looking beyond our tier 1 suppliers, to gain greater transparency across our supply chain. Being at different levels of maturity and resourcing, for some of our suppliers these conversations can be uncomfortable. We are committed to supporting them to build capability and capacity to enable them to play their part in addressing this heinous issue.

Glad Group continues to support the principles of the Cleaning Accountability Framework (CAF) and in FY23 participated in three building certifications in partnership with our customers, and also commenced the process of prequalification for our own business. We remain committed to collaborating with organisations such as the United Nations Global Compact who advocate for best practice and knowledge sharing.

It was saddening to see that the 2023 Global Slavery Index has revealed that the number of people living in modern slavery has grown since 2018. We must therefore continue to build on the work we have done to date, and we welcome all feedback to help us to continue to evolve our response.



Steve Iloski  
Chief Executive Officer  
Glad Group



### 3. Glad Group's Feedback and Grievance Mechanisms

#### Modern Slavery happens in Australia.

Modern slavery refers to a range of acts which are serious crimes and grave forms of human rights abuses. It includes servitude, slavery, forced labour, deceptive recruiting for labour services, forced marriage, debt bondage, trafficking in persons and child labour. Situations where modern slavery takes place likely include a range of other violations of the human rights of workers and there are many complex factors that enable it still to persist.

All workers in Australia have basic rights that are protected by law. These laws cover all workers including those from overseas, regardless of the length of their stay or visa type.

IF YOU OR SOMEONE YOU KNOW IS BEING EXPLOITED, HELP IS AVAILABLE.

- For information or confidential advice please contact Australian Red Cross. Call 03 9345 1800 or email [national\\_stpp@redcross.org.au](mailto:national_stpp@redcross.org.au)
- For free and confidential legal advice, contact Anti-Slavery Australia on 02 9514 8115 or email [ASALegal@uts.edu.au](mailto:ASALegal@uts.edu.au)
- If it is an emergency or a threat to someone's safety, call the police on 000. To report a possible case of modern slavery, call the Australian Federal Police on 131 237.
- Call or email our Whistleblower Service. Anyone lodging a report through this independently managed service can feel confident that extensive measures are in place to protect your privacy.

[@:whistleblowing.com.au/gladgroup/](https://www.whistleblowing.com.au/gladgroup/)

Call: 1300 687 927 (AUS)

0800 867 927 (NZ)

To make a report you will need:

Unique key: GLAD2021 | Reference number: GladGroup21



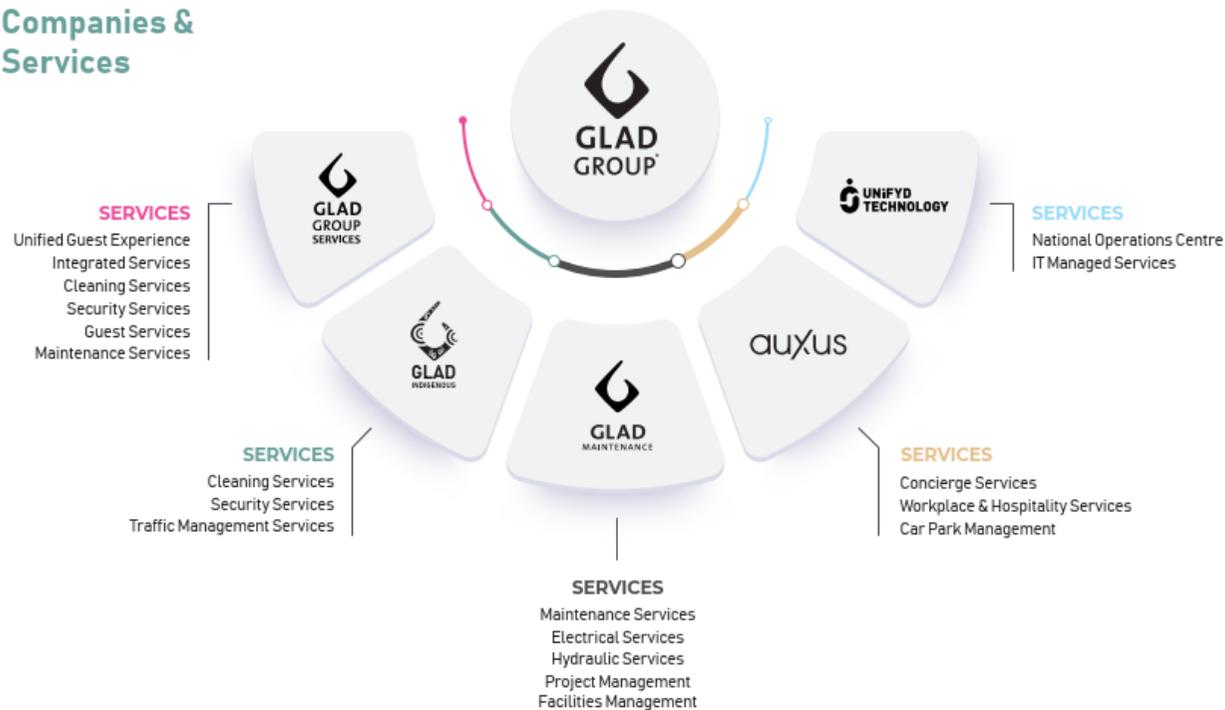
#### 4. Glad Group's Structure, Operations and Supply Chain

Australian-owned, Glad Group provides integrated property services to customers, including cleaning, security, concierge and maintenance services. Glad Group's headquarters are located in Rockdale, NSW, with a total of four Australian state-based offices. We have approximately 2,500 people based at customer assets around Australia and New Zealand. These people are either directly employed as permanent employees, or in some cases as casual support staff to meet variable operational demands.

Our customers include ASX listed property companies, government agencies and tertiary institutions.

Our people come from culturally and geographically diverse backgrounds, with more than 90 nationalities across our business.

#### Companies & Services



In FY23, Glad Group worked with 437 suppliers. These suppliers provided:

- **Products procured to deliver services** include cleaning materials, cleaning equipment, bathroom and kitchen products, fleet vehicles, tools, materials, information technology supplies such as radios and mobile phones, electrical items such as light globes and electrical wiring, uniforms and personal protective equipment.
- **Services procured** include technical or specialist cleaning services (such as high-rise window cleaning), specialist security services (such as mobile patrols) and labour hire for specific projects.
- **Corporate products & services procured** include office stationery and supplies, furniture, IT equipment and professional services.

The majority of our tier 1 suppliers are located in Australia. Behind this sits a multi-layered supply chain that spans many different countries. This makes the gaining of transparency of this supply chain much harder, leading to a lack of clear oversight of working conditions and in turn a greater potential risk of modern slavery. We recognise the potential risk with respect to labour exploitation globally, particularly regarding certain geographies and local contexts, and the many thousands of workers that will be employed in these supply chains. For more details on our supply chain profile and the work we are doing to address modern slavery risk see page 8.



## 5. Our Commitment to Human Rights

As an organisation that promotes inclusivity and ethics, we publicly support and respect the Universal Declaration of Human Rights (UDHR), the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO Declaration), the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

## 6. Highlights in FY23

- Enhanced our understanding of operations and supply chain modern slavery risk.
- Partnered with our customers on three successful CAF certifications and commenced CAF prequalification for the Glad Group business.
- Continued the operationalisation of our Responsible Procurement Approach, including on-going and deeper engagement with our highest risk suppliers.
- 99% of our tier 1 suppliers are Australian based businesses.
- Continued to build awareness and educate our 2,500 people.
- Remained an active signatory to the United Nations Global Compact, participating in their Human rights-based Accelerator Program and their Modern Slavery Community of Practice, joining their annual Australian Dialogue on Business and Human Rights.

## 7. Glad Group's Approach to Assessing Modern Slavery Risk

At Glad Group, modern slavery is considered in the broader context of human rights and labour rights. It is informed by the United Nations Guiding Principles on Business and Human Rights, the recognised global standard for assessing and addressing potential human rights impacts because of business operations. We understand that our business activities could:

- Cause
- Contribute to, or
- Be directly linked to modern slavery.

This is aligned to the UN Guiding Principles continuum of involvement. Understanding our risks is a continuous process that is supported by Glad Group's Risk Management Framework and our robust corporate governance approach. It is brought to life on a daily basis by our experienced and specialist Risk and Compliance, Procurement, ESG and People and Culture teams.

## 8. Identifying the Risks of Modern Slavery Practices in our Operations and Supply Chain

It is critical that we remain committed to strengthening our approach to assessing and addressing potential risks both within our own operations and supply chain.

### Our operations

Glad Group operates in industries that have been identified as having higher risks for labour rights violations and the potential for modern slavery risk. Security and cleaning businesses tend to attract more vulnerable workers such as migrants and those for whom English is not their first language. This is true for our business, and we know that migrant workers represent a disproportionate number of the global instances of modern slavery<sup>1</sup>. The potential to exploit such vulnerable workers has been exacerbated historically in the cleaning industry where profit margins are low due to high expectations from customers regarding service delivery and meeting increasing compliance requirements.

### Our supply chain

Whilst most of our Tier 1 suppliers are based in Australia, the multi-layered global nature of our supply chain means that we do not have control or full visibility over it.

This year, Glad Group piloted a Modern Slavery Supply Chain Risk assessment with FairSupply Analytics' Integrated Assessment Engine, which links supply chain data from 190 countries in relation to 15,909 industry sectors. We piloted this with ten of our most significant / highest risk suppliers. This means that for these suppliers we can now understand their location and corresponding business activities, and the economic inputs required to produce their products and services which can be traced and mapped to tier 10 of the supply chain. This assessment has provided significant insights into exactly where in our key suppliers' supply chains the potential for modern slavery risk is highest, and therefore where our suppliers should be targeting their due diligence and investigations. Glad Group is sharing this information with our suppliers and is also committed to working further with FairSupply Analytics to risk assess additional suppliers in our supply chain in the coming year.

The assessment of these suppliers included the following industries:

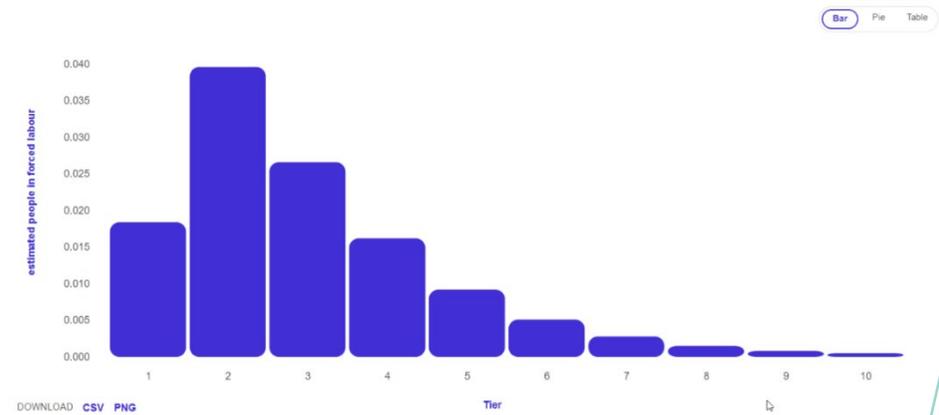
- Labour hire
- Uniform provision
- Cleaning supplies and solutions
- Cleaning equipment
- Software services
- Electrical product distribution
- Telecommunications.

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<sup>1</sup> 'Migrants and their vulnerability', IOM 2019

The pilot identified the following spread of potential modern slavery risks in this subset of our supply chain:

It also highlighted that for this subset of our supply chain the greatest potential risk of modern slavery lies in Tier 2 of our supply chain, followed by tier 3.



Glad Group will be using this risk assessment to determine which suppliers require further due diligence to be conducted on them, and with whom we must be engaging the most to understand what they are doing to manage and mitigate the potential risks of modern slavery.

### Case Study: The intersectionality of issues

It is important to recognise the intersectionality of human rights (and modern slavery) risks with climate risks. Climate change can have a profound and often disproportionate impact on human rights. An example of this can be seen with solar panels. Glad Group is committed to reducing our impact on the environment, and two years ago put 296 solar panels on the roof of our headquarters in Rockdale, to reduce our reliance on grid electricity. While this has driven a positive environmental outcome, we acknowledge the potential risk of modern slavery in solar panel procurement. We are committed to learning more about this high-risk product and its supply chain.

### Overall assessment

Glad Group has assessed that the potential for modern slavery risk in Glad Group's own operations is relatively lower than across our supply chain; most of the employees working for our business are employed directly which means that we have control of their terms and conditions of employment, including the practice of ensuring that every employee receives a contract of employment. (See page 12 for more details about actions to address the potential for modern slavery risk in our operations).

In line with last year, the key risks that we have identified as relevant to both our own operations and supply chain include:

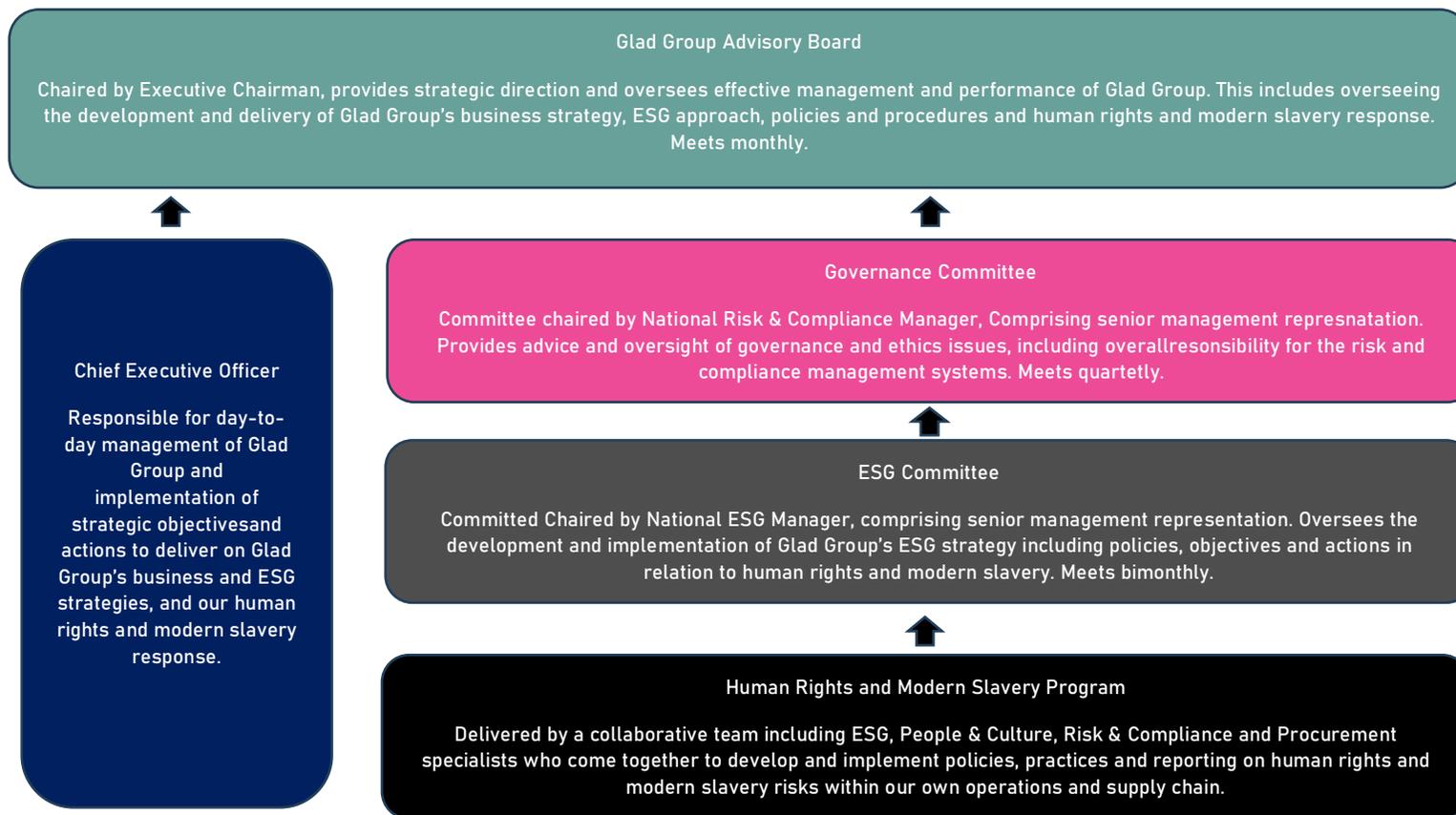
- The upholding of all labour rights.
- The right to a safe work environment.

Breaches in either of these areas can be an early signal of worsening conditions for people and could be a precursor to incidents of modern slavery.

Deceptive recruitment, immigration related coercion and threats, debt bondage, confiscation of personal and travel documents, withholding wages, excessive overtime and dangerous or substandard working conditions are all practices that have been found in the cleaning and security industry in Australia. In addition, there are the potential risks of child labour, forced labour or a lack of freedom of association in our supply chain.

## 9. Taking Action to Address the Risks of Modern Slavery Practices in our Operations and Supply Chain

Whether the risk be related to our own operations or supply chain, Glad Group's response to identifying and mitigating the risk of modern slavery is led by our Advisory Board and Senior Management team. We leverage Glad Group's existing corporate governance structures to oversee our human rights and modern slavery approach and deliverables, understanding that it will take many and collaborative actions. These governance structures ensure we remain vigilant and adopt a continuous improvement approach to the activities that we undertake.



## Policy Framework

Our policy framework articulates our human rights expectations to both our own people as well as our suppliers and other stakeholders. Our Human Rights Policy articulates our commitment to respecting and promoting human rights. It reflects our commitment to upholding ethical principles and values and sends a clear message that we understand the intrinsic value and dignity of every individual. This is supported by our Code of Conduct, Anti-Bribery Fraud and Corruption Policy, Supplier Code of Conduct and various People & Culture policies including Diversity, Equal Employment and Opportunity and our Whistleblower program which are communicated to all employees through mandatory training, with all policies also available on our intranet and website for our external stakeholders. These policies are publicly available at [gladgroup.com.au](http://gladgroup.com.au).

## Risk Management Framework

Glad Group is also leveraging our risk management framework – in line with the integration of ESG risks more broadly, modern slavery risk sits as a key risk that the organisation must manage. In line with all our identified risks, once the risk is identified we develop policies and procedures and define responsibilities for the implementation of actions to address the risk and review the effectiveness of these actions within the requirements of the framework.

## Building Capability and Awareness

Building capability and awareness of what modern slavery is, and what to do if it is suspected, remains an area of focus. Throughout FY23 we have delivered mandatory training modules to our employees through our on-line learning platform, Glad Academy. This has been supplemented with communications, for example posters at all sites where we have employees, information on Central (our intranet) as well as information provided through our bi-monthly Townhall updates. FY24 will see the launch of Glad Life, a series of communications in different formats that will reinforce key messages around expected behaviours in the workplace and the channels available to our people to raise a concern if they have one. This general training has been supplemented with the requirement for all of our people managers to complete the Supply Chain Sustainability School Modern Slavery beginner and intermediate level modules, which provides information not only on what modern slavery is but our obligations to identify, mitigate and report on potential modern slavery risk in line with the Australian Modern Slavery Act 2018 (Cth). For Glad Group this is about fostering a culture of awareness and responsibility throughout the entire business.

## Stakeholder Engagement

Listening to our stakeholders and having in place the means to respond to potential and actual instances of human rights violations both within our own businesses and supply chains is a critical part of a comprehensive approach to addressing modern slavery. This is discussed later in this Statement.

## Collaboration

Collaborating with industry peers and NGOs also forms part of the actions we take, sharing ideas, information and best practice in combatting modern slavery.

Glad Group engages with the following global and industry groups to continue to build and deepen our understanding of modern slavery risks and responses and help our business partners build their capability and understanding.



**United Nations**  
Global Compact

United Nations Global Compact



Supply Chain Sustainability School



Australian Security Industry Association Limited



Partnering with customers for CAF certified buildings and undertaking pre-qualification.



UWU partnership with Glad Group

Importantly, our response relies upon ongoing collaboration and engagement across all areas of our business. We remain committed to preparing our annual Modern Slavery statement and being transparent about our actions to combat modern slavery, including progress and challenges.

## Operations

Our actions to address the risk of modern slavery within our own operations are also informed by Cleaning Accountability Framework Modern Slavery Spectrum in Cleaning. This explains that there is a spectrum of harmful behaviour with the potential for any infringement of decent work conditions to lead to far worse situations for employees if not address.



As in previous years, modern slavery risk in Glad Group's operations remains relatively low. This is due to:

- Of our 2,500 people, most are in Australia, with only a small proportion overseas in New Zealand.
- A contract of employment is issued to all our employees, which details the terms and conditions of their employment. All new starters are also issued with Fair Work documentation providing information on basic rights and entitlements at work, and this guidance is also provided in many different languages.
- More than 80% of our people are covered by a Modern Award<sup>2</sup>.
- Our comprehensive suite of policies and grievance mechanisms (including our independent Whistleblower hotline) provide the foundation for a fair, equitable and safe work environment and so that our employees can raise concerns and issues without fear of retribution.

<sup>2</sup> A modern award refers to a legal document that provides for the minimum pay rates and conditions of employment (including entitlements).

- We have implemented consistent recruitment processes that clearly communicate to candidates the specific documents and information they need to provide during the hiring process. This may include proof of age, work authorisation, and licensing (for example for security roles). We also have clear and consistent processes to on-board new employees and ensure they are input into our time and attendance system. Only when these steps have been taken can an employee be paid.
- We continue to undertake detailed auditing of our own systems and participate in customer-led independent auditing including CAF.
- Focusing on safety in the workplace, in line with our ISO45001 accredited Workplace Health and Safety Management System.
- Oversight by the Glad Group Senior Management Team, ESG Committee and Advisory Board, including the review and monitoring of themes being raised through all our grievance channels.
- When tendering for new business we ensure that the contract is costed and priced appropriately and is sufficient to meet the full (and true) cost of the service provision.

#### Case study: The real cost of reducing the price of the contract.

Customer expectations of property services industry participants to provide their services in the most socially conscious and environmentally friendly way possible continue to rise, in line with the broader community focus on environmental and social impact. Glad Group welcomes this and has a great desire to continue to learn and grow and seek new and innovative ways of delivering services to drive positive environmental, social and governance outcomes.

It is important to note that embedding these principles into our business and operations takes resource and so comes at a cost. It is not a cost we are unwilling to incur but these additional costs do apply increasing pressure on service providers like ourselves. Consequently, the demands to embed and manage compliance must be considered by our stakeholders, in particular our customers, when seeking to engage our services.

For any business to deliver great service in a sustainable and ethical way, they must be financially viable, and to do that they need to be receiving a fair price for the services provided. There must be balance between competitive pressures that enable cost-effective service solutions, fair margin and the confidence that employees are paid a fair wage. The implementation and adoption of ESG initiatives must themselves be sustainable – and the cost of compliance must be shared.

#### Supply chain

We know that the risk of modern slavery practices in our supply chain is greater than in our own operations so assessing modern slavery risk in our supply chain is an area of priority. We remain committed to optimising the number of suppliers that we have in our supply chain and are prioritising a partnership approach that sees us having open and honest conversations, to understand our suppliers' approach and maturity to modern slavery risk identification and management and support their development. Our goal is to only work with suppliers who share our values and respect of human rights, but not to penalise those who may not have the resources or understanding to have fully developed their due diligence activities as yet. We are very clear with our suppliers about our expectations of their behaviours, and these are articulated not only in our contractual arrangements with them but also our Supplier Code of Conduct which they are required to formally acknowledge. If our suppliers do not have their own Supplier Code of Conduct, we are supporting them in the development of their own so that they can be clear about their expectations of their suppliers.

We are also cognisant that our activities could directly or indirectly drive an adverse human rights impact in our supply chain. Placing unreasonable demands on our suppliers could result in unacceptable labour practices down the supply chain drive. We take a partnership approach to working with our suppliers – by moving beyond a transactional focus, we can create win-win situations that benefit both parties in the long run.

With more than 400 suppliers in our tier 1 supply chain, we have adopted a risk-based approach which directs us to focus on applying our extended due diligence procedures on all new suppliers and those existing suppliers with most significant spend / that we have identified as greatest potential risk for modern slavery.

Glad Group has used the following criteria, in line with previous years, to identify suppliers and supply chains at a potentially higher risk of modern slavery:

- Large value procurement, \$100,000 and above
- Global Slavery Index 2023 – top products at risk of modern slavery relevant to Glad Group being electronic goods, garments, solar panels and textiles.
- All international suppliers.
- All labour hire providers.

Suppliers that meet one or more of these criteria are included in our priority category A or B level of supplier and are subject to extended due diligence.

For the first time, Glad Group has also piloted an approach with FairSupply to assess our supply chain and understand where the greatest risk of modern slavery lies. While this process has only been conducted on ten of our most significant suppliers to date, it has validated our assessment of the highest risk suppliers and supply chains that we should be focusing on and importantly helped to identify where in these industry supply chains the greatest risk of modern slavery is and so where we can direct our suppliers to be increasing their due diligence efforts.



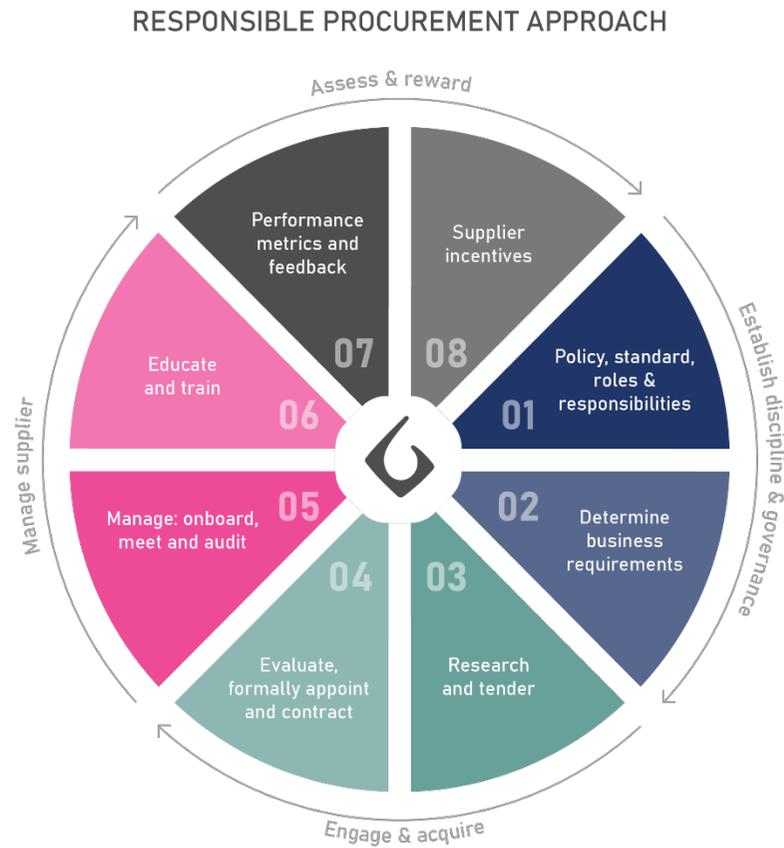
## Supply Chain Assessment Profile

Year	2020-2021		2021-2022		2022-2023	
	No of suppliers	% of spend	No of suppliers	% of spend	No of suppliers	% of spend
<b>Supplier Types (% of spend)</b>						
Number of Direct Suppliers (Tier 1)	424		421		437	
CATEGORY A: Large Value Procurement - \$500,001 and above, The Global Slavery Index 2018 Hot Spot Industries, Country of Origin (All International Suppliers) & Labour Hire Services	21	65%	26	68%	30	65%
CATEGORY B: Large Value Procurement - \$100,001 to \$500,000	45	22%	46	21%	34	21%
CATEGORY C: Medium Value Procurement - \$20,001 to \$100,000	80	9%	69	7%	74	10%
CATEGORY D: Small Value Procurement - \$5,001 to \$20,000	108	3%	116	3%	121	3%
CATEGORY E: Low Value Procurement - \$0 to & \$5,000	170	1%	164	1%	178	1%
<b>Country of Origin</b>						
Australia	424	100%	402	99%	425	99%
International	0	0%	19	1%	12	1%
<b>Category Type</b>						
Goods & Services	408	58%	408	69%	420	70%
Labour Hire	16	42%	13	31%	17	30%
<b>Length of Relationship (% of suppliers)</b>						
1 – 5 Years	324	76%	221	29%	258	44%
6 – 9 Years	92	22%	164	66%	120	30%
10 Year +	8	2%	36	5%	59	26%
<b>Business Type (% of spend) <sup>1</sup>[Our definition for small business &lt;\$250K spend per year]</b>						
Small Business	396	93%	392	93%	413	33%
Large Business	28	7%	29	7%	24	67%

*Note: since year end our labour hire providers have reduced to 11 partners.*

For some of our larger suppliers, such as computer equipment suppliers or government institutions, Glad Group has limited (if any) ability to influence the practices of the business. For these companies, we monitor publicly available information on their human rights and modern slavery practices and make informed purchasing choices.

Effective supplier due diligence processes are crucial for ensuring that we engage with suppliers that meet our standards for ethical, legal, and operational performance. Glad Group has implemented a Responsible Procurement Approach which ensures that we adopt a consistent process in the management of our supply chain.



In addition to setting clear expectations for our suppliers of their behaviour (and that of our suppliers' suppliers), our other due diligence activities include:

- Conducting desktop research as an initial screening step to assess whether a potential supplier is worth further consideration.
- Establishing clear contractual agreements that specify the terms and conditions, and their responsibilities.
- Requiring completion of our annual supplier self-assessment questionnaire (which is also a key document in Glad Group's assessment of potential new suppliers) which informs our level of management approach (see below) and informs our risk assessment. In the coming year, Glad Group will look to leverage the questionnaires from the FairSupply platform.
- Provision of training resources. In the previous year's statement, we advised that we were commencing the Glad Group Supplier Academy. Feedback from our suppliers noted that they preferred one on one engagement, and the sharing of resources, rather than face to face sessions. As such we have adapted our approach in line with their feedback.
- Fostering open communication to address issues early and find opportunities for improvement.
- Implementing on-going monitoring of supplier performance and compliance.
- Undertaking a program of assurance with our labour hire providers.

Supplier self-assessments play a significant role in supplier due diligence processes. They are a valuable tool that allows suppliers to provide information and insights about their own operations, practices, and compliance with various standards and requirements. They promote transparency in the supplier relationship and give our suppliers an opportunity to openly communicate their capabilities, strengths, and areas where they may need improvement. Particularly for those suppliers who are not mature in the space, they can use self-assessments to identify and disclose potential risks within their own operations. This includes risks related to governance, ethical practices and human rights and modern slavery. The assessment also allows our suppliers to confirm their compliance with various requirements, such as legal, environmental, labour, and quality standards.

During the year, Glad Group asked 44 category A and B suppliers to complete the self-assessment. The remainder of the A & B suppliers are government/statutory entities, utilities or large global corporations who provide public information on their Modern Slavery management approach. The challenge with many of our suppliers is ensuring that we receive a timely response. A large number of the businesses that Glad Group works with are small and medium sized enterprises and do not have dedicated ESG or Human Rights resources; for many of them, it is not that they don't want to respond, rather they have not received this kind of self-assessment before or are concerned that their responses will dictate whether they continue to work with Glad Group. Consequently, we continue to spend significant time working with our suppliers on an individual basis, supporting them through the processes of completing the questionnaire and reminding them that it is about continuous improvement.

Working through the assessment responses is a continual process and informs our engagement and management of them:



Glad Group has also commenced an audit program for our labour hire providers. This program is a proactive approach to review the operating practices of labour hire providers to ensure the organisations have compliant labour rights practices and to improve the transparency and integrity of the industry. The program sees Glad Group visit each of our labour hire providers at least once a year, with the potential for additional visits if issues are identified. We look forward to sharing more about the program in future statements as the program matures.

We understand the value of building trusted and deeper partnerships with our suppliers. It is essential for fostering collaboration, reducing risks and driving mutual success. It stands us in good stead to have sometimes uncomfortable conversations with our suppliers to support them to do more in their businesses and supply chain to mitigate the risks of modern slavery. We are also finding when we ask deeper questions about our suppliers' supply chains, they are sometimes hesitant to share information as they consider it commercially sensitive. This has never been about catching our suppliers out or gaining a competitive advantage with them; rather it is about driving continuous

improvement in their businesses, and we are committed to pushing this message with our suppliers moving forward. It is only if a supplier is not willing or able to address risks and drive improvements that as a last resort, we take the option to exercise our right to terminate the agreement. The reality is that progress and improvement takes time, and we are committed to staying the course.

### Case study: The role of labour hire partners in our business

On occasion, Glad Group relies on labour hire providers to support business operations. Labour hire providers are defined as businesses providing temporary workers to work as part of the Glad Group team. This tends to be for security services, including in remote or rural customer locations, and for technical or specialised cleaning services.

We know that labour rights risks might be higher for these workers as we have less visibility of how these workers are engaged, remunerated and treated. This group of suppliers is also included in our priority category A suppliers (see below) which means that they are subject to the highest level of supplier due diligence (see above).

The level of labour hire provision undertaken continues to decrease year on year in line with our longer-term commitment to move away from engaging these providers, from 31% of our total spend to 30% in FY23. Where a labour hire provider is engaged, it is done so with the explicit approval of the relevant customer. Glad Group works with a limited number of these businesses, many of whom are small to medium sized business owners and play a key role in providing employment opportunities for their local communities.



## 10. Grievance and Remediation

Grievance mechanisms are important to have in place to provide our employees and other stakeholders with both formal and informal processes to raise concerns or complaints. They offer a structured and consistent way to address and resolve issues or conflicts and enable people to seek resolution and remediation. They also promote fairness and equity by ensuring that everyone has equal access to a process for raising concerns. Ideally, grievance mechanisms allow businesses to identify and address issues and risks early.

At Glad Group we have different channels that allow stakeholders to voice their concerns. These start with informal channels (a conversation with a manager), to differing levels of formal (someone raising an issue with our People & Culture team or using our independent Whistleblower hotline). Each of these channels explicitly includes the opportunity for our employees or stakeholders to raise a concern about modern slavery. We remain clear, both internally and externally, about our expectations of behavior for our employees and stakeholders, with a view to us being able to hold people (or other businesses) accountable should behaviours occur that are not in line with these standards.

This includes being transparent in how our formal grievance mechanisms work in terms of process, confidentiality of comments, and level of support for both the victim(s) and person(s) accused of inappropriate behaviour. Feedback and complaints received through any of these channels are brought to our Senior Management Team in an appropriate (and anonymous) way for discussion and review.

While no slavery issues were raised in FY23 through either Glad Group Whistleblower hotline or any of the other the channels through which our people can raise an issue, an on-going challenge remains ensuring that our people feel confident that the grievance mechanisms we have in place can be trusted. Our workforce comprises people from many different backgrounds, and for who English is not always their first language. We have increased our communications about the channels available for our employees and other stakeholders to use to raise concerns or issues, including introducing Glad Life, an approach that will reinforce the communication consistent and critical information for all our employees. In FY24 we are also investigating translating this into different languages.

To improve our understanding of grievance mechanisms and modern slavery we have continued to collaborate with other businesses and NGOs through the UNGC Modern Slavery Community of Practice, as well as participating in their Business and Human Rights Accelerator Program.

Should Glad Group receive a report of Modern Slavery within our own operations, we would take action quickly to verify and investigate the issue, understand the cause, and resolve that as soon as possible in line with the wishes of the victim(s), ensuring an appropriate remedy to any harm suffered.

An ongoing area of improvement for Glad Group is in closing the gap we previously identified regarding the action we would take should an issue of modern slavery be raised in our supply chain. We do not have the knowledge, experience, capabilities and resources to investigate, coordinate stakeholders and facilitate the engagement between affected parties (who might also be overseas) required to develop a corrective action plan. For an organisation of our size, it is impractical to acquire and maintain a resource with the prerequisites required to perform this function and provide the workload necessary to maintain their skills and experience. We therefore continue to advocate for the development of a collaborative industry approach to remediation.

## 11. Addressing the Effectiveness of our Actions

Assessing the effectiveness of our actions to address modern slavery requires a systematic and ongoing evaluation process. It is important to undertake this assessment to ensure that our efforts to combat modern slavery are achieving their intended outcomes and making a meaningful impact.

Glad Group's Senior Management Team plays a key role in assessing the overall effectiveness of our actions. They

- Ensure there are clearly defined roles and responsibilities regarding modern slavery action.
- Review our policy commitments to ensure relevant and up to date. For example, in FY23 we updated our Human Rights Policy.
- Review, endorse and enforce training requirements.
- Facilitate feedback on our approach from different areas across the business, as well as external feedback.
- Review our risk assessment processes to ensure they are effective and fit for purpose, as part of our broader risk management framework
- Oversee assurance activities that we either participate in or conduct ourselves, ensuring corrective actions have been completed.
- Review KPIs including number and theme of internally reported grievances, number of whistle-blower complaints, completed training rates.
- Ultimately the effectiveness of our actions should be measured by whether we can identify modern slavery risks within our own business and supply chain. To date, we have not identified any in either therefore we need to do much more to improve the effectiveness of our actions.



### Case study: A review by FairSupply Analytics

In 2023, one of our customers engaged FairSupply Analytics to undertake an independent assessment of two of their office security contractors, one being Glad Group. The scope of the engagement included 21 employee interviews across the two contractors.

The assessment sought to understand and assess the right to work, pay and working conditions, the level of modern slavery understanding by workers, and the availability and effectiveness of modern slavery grievance and remediation processes.

The assessment found that there were no indicators of modern slavery occurring across either contractor workforce. It was also found that workers held higher educational qualifications and, in their interviews, appeared more empowered in terms of understanding their worker rights and relevant supporting grievance mechanisms.

### The key recommendations raised by the assessment were welcomed by Glad Group and included:

- Monitor the Modern Slavery Statements of contractors to ensure that grievance and remediation mechanisms that currently exist or are planned, are practically implemented and assessed for their effectiveness.
- Implement spot checks to confirm the outcomes of the assessment and ensure ongoing compliance.
- Ensure that all workers are covered by grievance remediation processes, and not just those subject to award or an industrial instrument.
- Evidence that grievance processes have been implemented, and how they have been accepted and used by workers, and
- Evidence that employees can access grievance materials in multiple languages.



## 12. Priorities for the next 12 months

- Continue to engage on and deliver training for our people including identifying and sharing training that is useful for our supplier partners, to build capability and knowledge.
- Focus on further building accessibility and trust in our grievance mechanisms, including sharing key information in languages other than English.
- Develop an internal Worker Voice forum which will be leveraged to facilitate feedback on the effectiveness of Glad Group's approach to addressing the risk of modern slavery within our own operations.
- Continue to work with our suppliers to gain transparency beyond tier 1 of our supply chain.
- Work with FairSupply Analytics to understand where the most potential for modern slavery risks lies within our supply chain, sharing this with our suppliers and supporting their activities to undertake due diligence, as part of the implementation of our Responsible Procurement Approach.
- Engage with other businesses, industry peers and non-government organisations to understand leading practice, and opportunities for collaboration.
- Regularly review our business practises with respect to modern slavery and identifying lessons learnt, embedding change in our policies and processes as appropriate.
- Annually report externally on progress and learnings through our Modern Slavery Statement and ESG Report.
- Advocate for a collaborative industry approach to remediation.



