



# Glad Group 2024 Modern Slavery Statement

We create welcoming experiences and safe places, every day.



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## *Acknowledgment of Country*

Glad Group acknowledges 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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This Modern Slavery Statement forms part of our broader reporting suite. Visit [gladgroup.com.au](https://gladgroup.com.au) to read our latest ESG reports.

Mandatory reporting criteria	
Criteria 1 & 2	Identify the reporting entity and describe its structure, operations and supply chains.
Criteria 3	Describe the risk of modern slavery practices in operations and supply chains of the reporting entity and any entities it owns or controls.
Criteria 4	Describe the actions taken by the reporting entity and any entities that it owns or controls to assess or address these risks, including due diligence and remediation processes.
Criteria 5	Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks.
Criteria 6	Describe the process of consultation with any entities the reporting entity owns or controls.
Criteria 7	Provide any other relevant information.



# 01. About this statement

This joint statement is submitted 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, Auxus Pty Ltd and Stratium Global Pty Ltd trading as Unifyd Technology.

This is Glad Group's fifth 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 2024. It describes the steps taken by the Glad Group of companies to mitigate modern slavery in our business' operations and supply chains.

## 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.

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 (Cth).

This statement was approved on 20 December 2024 by the Glad Group Advisory Board.



**Nick Iloski**

Executive Chairman  
Glad Group Advisory Board



## 02. Message from the CEO



I am pleased to present Glad Group's fifth joint Modern Slavery Statement for the financial year ending 30 June 2024 (the Reporting Period).

Glad Group's purpose is to create safe and welcoming experiences every day. This purpose is grounded in our belief that everyone has a fundamental right to respect, dignity and safety at work.

During the Reporting Period, no instances of modern slavery were identified in our operations or supply chain. However, we acknowledge the ongoing risk and remain vigilant in our efforts to mitigate it.

Our approach to modern slavery is guided by the United Nations Guiding Principles on Business and Human Rights, and we continue to prioritise actions to minimise the potential risks of modern slavery within both our operations and supply chain.

Addressing these issues remains a priority for Glad Group, as identified in our refreshed ESG strategy. Our strategy ensures that we focus on the material issues that impact our business and stakeholders in delivering our services. Managing and mitigating potential modern slavery risks is central to our approach.

The preparation of our FY24 statement has provided an opportunity to reflect on our actions and progress during the reporting year, as well as to identify future improvements to further reduce potential risks.

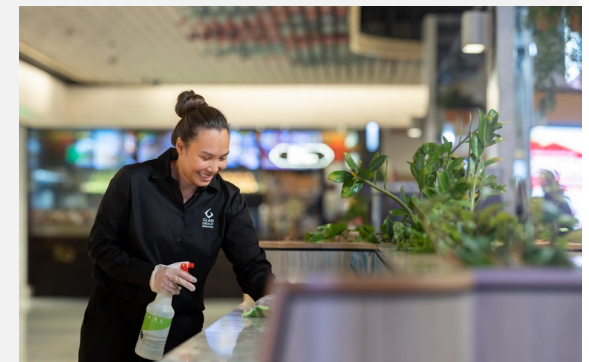
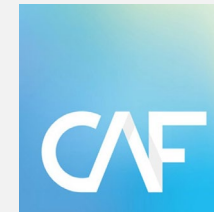
A handwritten signature in dark ink, reading "Steve Iloski".

**Steve Iloski**  
Chief Executive Officer  
Glad Group

**Steve Iloski**  
Chief Executive Officer

## Key progress in FY24 includes:

- Partnering with the Cleaning Accountability Framework (CAF) to act against modern slavery in commercial cleaning, including:
  - Progressing our **CAF Contractor Prequalification** to assess our systems, policies and procedures and support our customers to achieve CAF Building Certification at their assets.
  - Partnering with our customers to achieve the **CAF 3 Star Standard** across work practices, safety conditions, responsible contracting, and worker engagement at four assets, including **EastCo** and **Eastland** in VIC and **Westpoint** and **Castle Towers** in NSW.
- **Leveraging third-party ESG risk data** to inform assessment and engagement of our most significant and high-risk suppliers.
- Remaining an **active signatory to the United Nations Global Compact (UNGC) and Modern Slavery Community of Practice**.
- **Collaborating with our customers on third-party audits** (Workplace Wizards, FairSupply) of our operations and responses to modern slavery.
- Receiving an **EcoVadis Silver Medal** in 2024 (up from Bronze in 2023) in recognition of our environmental, labour and human rights performance, placing Glad Group in the top 25% of companies assessed.



## 03. Our structure, operations and supply chain

Glad Group is a privately Australian-owned integrated property services company providing cleaning, security, concierge and maintenance services.

Glad Group's headquarters are in Sydney, NSW, with three Australian state-based offices in VIC, QLD and WA. During this reporting period, we have 2,750 people based at customer assets across Australia and New Zealand.

Our 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 funds and managers, government agencies and educational institutions.

### Our structure and operations



#### Glad Group Services

- Cleaning services
- Security services
- Guest services
- Maintenance services
- Integrated services

#### Unifyd Technology

- IT managed services

#### Glad Maintenance

- Maintenance services
- Electrical services
- Hydraulic services
- Project management
- Facilities management

#### Auxus

- Concierge services
- Workplace services
- Hospitality services

## Our locations



**2,750**  
experienced team  
members



**4**  
offices in  
Australia



**400**  
assets we clean, secure  
and maintain every day

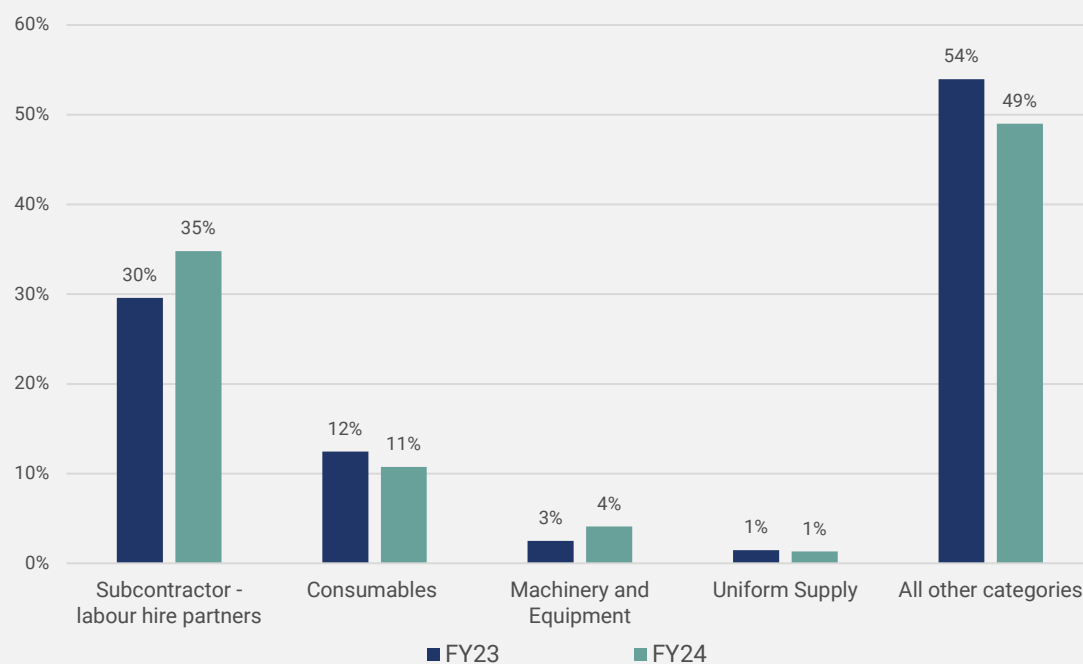
## Our supply chain

Our main spend categories comprise:

- **Products procured to deliver services** include cleaning materials and equipment, fleet vehicles, tools, information technology supplies, electrical items, 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 and services procured** include office stationery and supplies, furniture, IT equipment and professional services.

Glad Group has mapped the spend in the reporting period against high-risk categories for modern slavery. This highlights the areas where our efforts to mitigate modern slavery risks are concentrated. See pages 15-18 for how Glad is managing these risks in our supply chain.

### Supply chain spend by category





# 04. Identifying our modern slavery risks in our operations and supply chain

Understanding our risks is a continuous process that is supported by Glad Group's risk management framework and our corporate governance approach. It is brought to life daily by our experienced and specialist Operations & Service Delivery, Risk & Compliance, Procurement, People & Culture, and ESG teams.

Glad Group has assessed that the potential for modern slavery risk in Glad Group's own operations is lower than across our supply chain. 87% of our employees are employed directly and we have control over their terms and conditions of employment.

In line with previous years, 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 these areas are an early warning signal of worsening conditions for people and may indicate the need for additional proactive measures to prevent incidents of modern slavery.

## 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. Cleaning and security businesses can attract more vulnerable workers such as migrants and those for whom English is not their first language.

We know that migrant workers represent a disproportionate number of global instances of modern slavery. 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 99% 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.

Following a pilot in FY23, in FY24 Glad Group continued our audit of high-risk suppliers via the Modern Slavery Supply Chain Risk Assessment with FairSupply Analytics, focusing on our most significant and highest risk suppliers. 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 insights into where the potential for modern slavery risk is highest in our key suppliers' supply chains, and therefore where our suppliers should be targeting their due diligence.

We continue to share this information with our suppliers and are focused on leveraging third-party analytics to assess risk for additional suppliers in our supply chain.

The assessment of these suppliers included the following industries:

- Subcontracting
- Uniform provision
- Cleaning supplies and solutions
- Cleaning equipment
- Software services
- Electrical product distribution
- Telecommunications

Glad Group uses this analysis to determine which suppliers require further due diligence and with whom we must be engaging to manage and mitigate the potential risks of modern slavery.



# 05. Managing our modern slavery risks

During FY24 Glad Group continued to manage modern slavery risks in our operations and supply chains through our governance, policies, management systems, industry collaborations, supplier engagement, and grievance mechanisms.

## Our Governance

Glad Group's response to managing 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, actions and reporting. This approach ensures we remain vigilant and adopt a continuous improvement approach to the activities that we undertake.

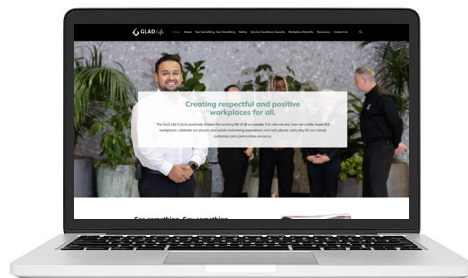


## Our policies

Our policies articulate our human rights expectations to both our people, our suppliers and other stakeholders.

Our Human Rights Policy details 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.

Supported by our Code of Conduct, Anti-Bribery Fraud and Corruption Policy, Supplier Code of Conduct, Remuneration Policy, Whistleblower Policy, Sustainable Procurement Policy, Diversity, Equal Employment Opportunity Policy and Anti-Discrimination and Grievance Resolution Policy. All policies are publicly available at [gladgroup.com.au](https://gladgroup.com.au)



## Risk management framework

Glad Group leverages our risk management framework, which integrates ESG risks more broadly, with modern slavery being a key risk the organisation must manage.

In line with all our identified risks, we develop policies and procedures and assign responsibilities for implementing actions to mitigate the risk and access the effectiveness of these actions in accordance with the framework's requirements.

## Our management and training

Building internal capability and awareness of what modern slavery is and what to do if it is suspected continues to be an area of focus. In FY24, we continued to deliver mandatory Modern Slavery Awareness training modules to all our employees through our online learning platform, Glad Academy. We also launched Glad Life, a dedicated online portal designed to positively shape the working life of all our people. Building internal capability and awareness of what modern slavery is and what to do if it is suspected continues to be an area of continued focus.

In FY24, we continued to deliver mandatory Modern Slavery Awareness training modules to all our employees through our online learning platform, Glad Academy. We also launched Glad Life, a dedicated online portal designed to positively shape the working life of all our people. It includes critical information, including our commitment to a Speak Up culture, which details the ways in which our team members can privately raise concerns over any wrongdoings or workplace misconduct, including relevant phone numbers and emails as well as an ability to view and download all our policies.

In addition, Glad Life is also where our workers can find a QR Code to find their state WHS regulator to report unsafe work practices and a link to send a private email to our compliance team to raise any concerns. See more about our grievance mechanisms on page 18.

This is supplemented with communications, including posters at all sites, intranet information as well as information provided through our bi-monthly Townhall updates.

**GLAD** Life



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## Collaboration and engagement

Glad Group continues to engage with global and industry groups to build and deepen our understanding of modern slavery risks and help our business partners build their capability and understanding.



We've been a signatory of the United Nations Global Compact since 2020.

We continue to support the principles of the Cleaning Accountability Framework (CAF), working in partnership with our customers to achieve CAF 3 Star Standard. We're undertaking Contractor Prequalification for Glad Group.

We maintain a strong partnership with the United Workers Union (UWU) which represents the interests of cleaning and security officers across Australia.

We've been a member of the Australian Security Industry Association Limited since 2016.

We've been a Property Council of Australia (PCA) member since 2023 and participate in the PCA's Informed 365 platform modern slavery survey.

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



## In our operations

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

- Of our 2,750 people, most are in Australia, with only a small proportion overseas in New Zealand.
- An employment contract is issued to all our employees, which details the terms and conditions of their employment.
- We do not employ anyone under 18 and all new starters are also issued with Fair Work documentation providing information on basic rights and entitlements at work, which is also provided in many different languages.
- More than 80% of our people are covered by a Modern Award.
- Our suite of policies and grievance mechanisms (including our independent whistleblower hotline) provides the foundation for a fair, equitable and safe work environment so that our employees can raise concerns and issues without fear of retribution.
- We have implemented consistent recruitment processes that clearly communicate the specific documents and information candidates 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 a clear and consistent process to onboard new employees and ensure they are entered 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.
- Our robust focus on safety in the workplace in line with our ISO 45001 accredited Workplace Health and Safety Management System.
- Oversight by the senior management team and Advisory Board, including reviewing and monitoring themes being raised through all our grievance channels.



## In our 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.

With more than 453 suppliers in our Tier 1 supply chain, we have adopted a risk-based approach which prioritises extended due diligence procedures for all new suppliers as well as existing suppliers with the highest spend and those identified as posing the greatest potential risk for modern slavery.

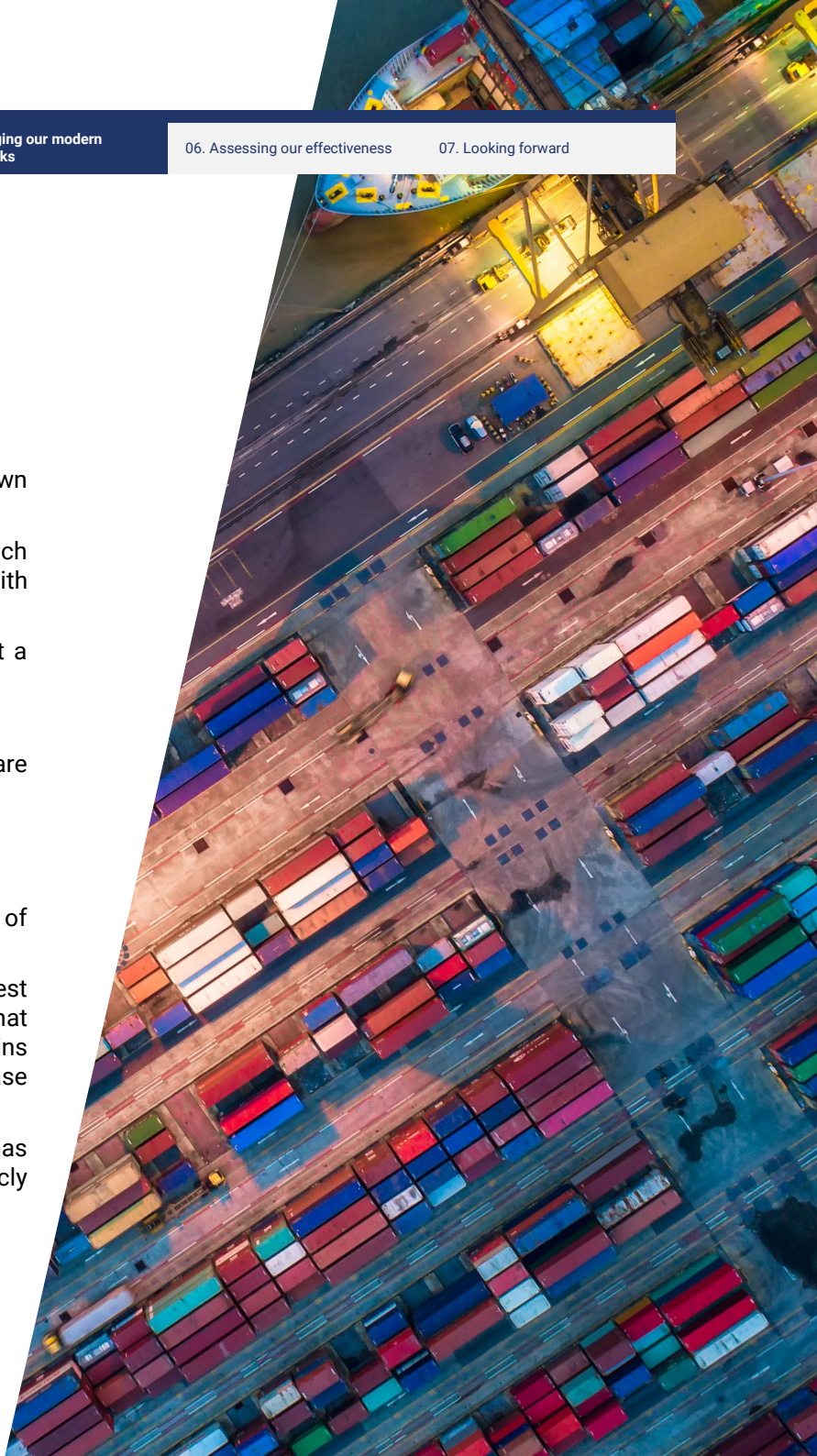
We use the following criteria, in line with previous years, to identify suppliers and supply chains at a potentially higher risk of modern slavery:

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

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.

Glad Group has again used FairSupply to assess our supply chain and identify areas with the highest risk of modern slavery. This has validated our assessment of the suppliers and supply chains that require the most attention. It has also highlighted specific areas within these industry supply chains where the risk of modern slavery is greatest, guiding us on where to direct our suppliers to increase their due diligence efforts.

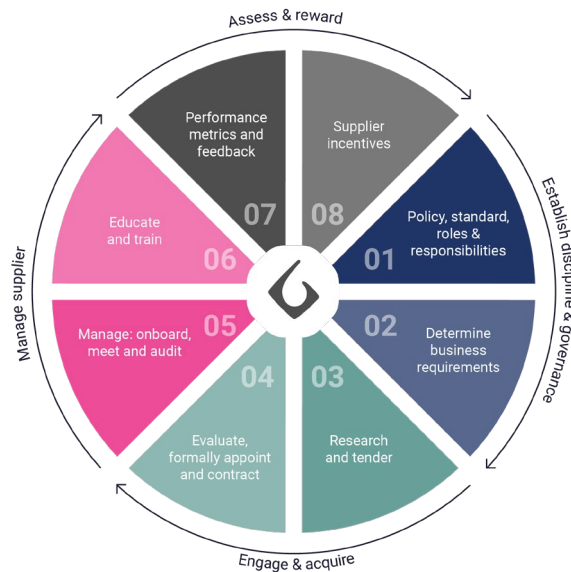
For some of our larger suppliers, such as those who supply computer equipment, Glad Group has limited ability to influence the practices of the business. For these companies, we monitor publicly available information on their human rights and modern slavery practices.





## Supplier due diligence

Glad Group continues to implement a responsible procurement approach to ensure we adopt a consistent process in the management of our supply chain.



Due diligence activities include:

- Establishing clear contractual agreements that specify the terms and conditions and supplier 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 us of our level of management approach (see below) and informs our risk assessment.
- Implementing one-on-one engagement, education, and ongoing monitoring of supplier performance and compliance.
- Undertaking an audit program with our subcontractor providers.

Glad Group continues to ask new category A and B suppliers to complete supplier self-assessments. The remainder of the A and B suppliers are government and statutory entities, utilities, or large global corporations that provide public information on their modern slavery management approach.

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

### Glad Group Questionnaire



#### ESG Questionnaire

This is completed by all new suppliers and Category A & B suppliers.



#### Assessment

Responses drive assessment of supplier performance and opportunities for improvement.



#### Active management

Driving how we actively manage the supplier, build their knowledge and capability and get to know them better.



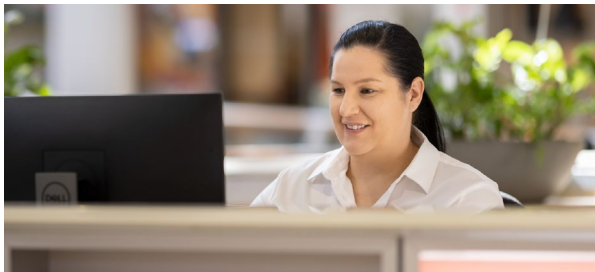
## Labour hire partners

On occasion, Glad Group relies on subcontractor providers to support business operations. This group of suppliers is also included in our priority category A suppliers which means that they are subject to the highest level of supplier due diligence.

In FY24, the proportion of our total spend allocated to labour hire partners increased from 30% to 35%. This increase reflects customer demand for specific services including technical and specialised cleaning, maintenance and security services, and concierge services at remote or rural locations.

Where a subcontractor provider is engaged, it is done so with the approval of the relevant customer. Glad Group works with a limited number of these businesses and continues its engagement program for our partner providers. This proactive initiative reviews subcontractor operating practices to ensure compliance with labour rights standards to improve industry transparency and integrity. As part of the program, Glad Group visits each provider at least once a year, with additional visits if any issues are identified.






**If you see something say something**

If you have a concern about a risk or wrongdoing at work speak up.

You can do this by contacting our whistleblower service to report misconduct and help make our workplaces safe, inclusive, and respectful.

Whistleblower Service:

Call 1300 687 927 AUS | 0800 687 927 NZ  
Or visit [whistleblowingservice.com.au/gladgroup/](https://whistleblowingservice.com.au/gladgroup/)

## Grievance and remediation

We have different channels that allow employees and other stakeholders to voice their concerns. These start with informal channels such as a conversation with a direct manager, to differing levels of formal channels, for example by raising an issue with a trusted member of 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 behaviour 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 about formal grievance mechanisms 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 modern slavery issues were reported in FY24 through either the Glad Group whistleblower hotline or any of the other the channels available for raising concerns, an ongoing challenge remains in ensuring that our people feel confident in the trustworthiness of our grievance mechanisms.

Our workforce is diverse, with many employees for whom English is not their first language. To address this, we have increased our communications about the channels available for our employees and other stakeholders to report concerns. We also provide Fair Work information in many different languages and continue to explore opportunities to translate relevant communications into additional languages.








To improve our understanding of grievance mechanisms, we have maintained engagement with the UNGC Modern Slavery Community of Practice and participated in their Business and Human Rights Accelerator Program. We also continue to work in partnership with the Union and CAF to support Worker Voice, helping to improve the effectiveness of our approach to mitigating modern slavery risk within our own operations.

If Glad Group receives a report of modern slavery within our own operations, we take immediate action to verify and investigate the issue, understand its cause, and resolve it promptly in accordance with the wishes of the victim(s), ensuring an appropriate remedy for any harm suffered.



## 06. Assessing our effectiveness

Assessing the effectiveness of our actions is essential to understanding the impact of our activities and determining whether our modern slavery identification and mitigation processes are effectively addressing our modern slavery risks.

Modern Slavery Program	How actions contribute to assessing effectiveness	Key
 <b>Policies</b>	Policies are foundational in embedding modern slavery measures across our business, making them an effective tool.	■ Effective
 <b>Governance</b>	An effective governance structure, with clear accountability for risk identification and management among key senior leaders, supports continuous improvement in addressing modern slavery risks.	■ Continue in FY25
 <b>Collaboration</b>	Collaboration enhances understanding of industry trends and challenges in addressing modern slavery.	
 <b>Suppliers</b>	Direct engagement with our suppliers fosters collaboration in addressing and mitigating modern slavery risks.	
 <b>Training</b>	Training increases our awareness of where modern slavery risks may occur and supports the reporting of risks.	
 <b>Risk</b>	Monitoring our modern slavery risk profile enables deeper understanding of potential risks in our supply chain.	
 <b>Grievance and remediation</b>	Modern slavery reports through Glad Group's whistleblower hotline, allow us to encourage identification and remediation of issues.	

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, and Glad will continue to improve the effectiveness of our actions.

# 07. Looking forward

Glad Group seeks to focus on continuous improvement in strengthening our modern slavery approach.

Our priorities include:

- Continuing to uplift training to build modern slavery knowledge and awareness.
- Strengthening modern slavery risk oversight into existing governance forums.
- Continuing to our efforts to improve accessibility in our grievance mechanisms.
- Leveraging third-party ESG risk management tools to understand our supply chain risk as part of our responsible procurement approach.
- Working with our suppliers to gain transparency beyond Tier 1 of our supply chain.
- Engaging with our customers, industry peers and non-government organisations to understand best practice, and opportunities for collaboration on identifying and addressing modern slavery risk including through CAF and the UNGC.
- Continuously reviewing our business practices concerning modern slavery and incorporating changes into our policies and processes as needed.

