

MODERN SLAVERY STATEMENT



2021



GLAD GROUP[®]
INTEGRATED PROPERTY SERVICES

Contents

Requirement 1 & 2 Identify the reporting entity and describe its structure, operations and supply chains	04
Requirement 3 Describe the risk of modern slavery practices in operations and supply chains of the reporting entity and entities it owns or controls	08
Requirement 4 Describe the actions taken by the reporting entity and any entities that it owns or controls to assess and address these risks, including due diligence and remediation processes	12
Requirement 5 Describe the process of consultation with any entities the reporting entity owns or controls	18
Requirement 6 Describe how the reporting entity assesses the effectiveness of actions being taken to assess and address modern slavery risks	20
Requirement 7 Roadmap: next 12 months and beyond	21



This is an interactive PDF.

The best way to view this report is with Adobe Reader.

Contents

Click on the page numbers to navigate through the report.

Home

Use the home button to navigate back to this page.

About this statement: (Consultation with owned or controlled entities)

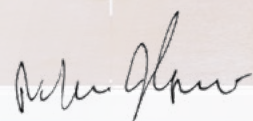
This Modern Slavery Statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) for the financial year ended 30 June 2021. It applies to and describes the steps taken by Glad Group companies to mitigate modern slavery in our business' operations and supply chains.

The statement is submitted as a joint statement on behalf of the following companies:

Glad Group Pty Ltd trading as Glad Commercial Cleaning, Glad Cleaning Service Pty Ltd trading as Glad Retail Cleaning, Glad Security Pty Ltd, Glad Maintenance Pty Ltd, Australian Protective Services Pty Ltd, Mutual Cleaning and Maintenance Pty Ltd, Glad Group NZ Limited, Stratium Global Pty Ltd, Auxus Pty Ltd and Glad Indigenous Pty Ltd¹.

The Glad Group Advisory Board is responsible for the governance and oversight of these companies. They have a set of common governance policies and procedures and a common sustainability, risk management and compliance framework. The companies also share an Executive Director and Senior Management team who have been consulted and contributed to the development of this statement. Employees of these companies form part of the Glad Group of employees. As such, we have actively engaged and consulted with all companies in the development of this statement. This included discussing details of the Modern Slavery Act 2018's reporting requirements and sharing information on progress and actions planned to address these requirements.

On 30 November 2021 this statement was approved by the Advisory Board, as the principle governing body for all Glad Group companies.



Nick Iloski

Executive Chairman
Glad Group Advisory Board

1. Glad Indigenous is a new business in the Glad Group of companies, in which Glad Group has a 49% interest. The business did not trade in FY21. In future, this business will be governed by a separate Advisory Board which be consulted and be required to approve this statement.

Introduction

This is Glad Group's second Modern Slavery Statement. It describes the steps we have taken to identify, mitigate and manage the risk of modern slavery in our operations and supply chains.

Taking these actions aligns with our culture and values and our commitment to operating a responsible and ethical business, putting the welfare and rights of our own people and those people in our supply chain, first.

What is modern slavery?

Modern slavery includes 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 are likely already to involve a range of other violations of the human rights of workers and there are many complex factors that enable it still to persist. The vast international trade networks mean that we are all responsible for focusing on modern slavery beyond our own countries of operation and must take action to understand the labour conditions in which goods and services have been produced to proactively identify, investigate, address, and ultimately prevent human rights issues among our own workforces and supply chains.





Glad Group structure, operations and supply chain

Proudly Australian-owned, Glad Group has been dedicated to working in partnership with customers to achieve their goals since 1989. Glad Group provides integrated property services to clients, including cleaning, security, concierge and maintenance services.

Our Services

 Cleaning	 Security	 Maintenance	 Concierge	 National Communications Centre
---	---	--	--	---

Glad Group’s headquarters are located in Rockdale, NSW, with a total of four Australian state-based offices. We have more than 2,500 people based at client assets around Australia and have recently expanded into 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 clients include ASX listed property companies, government agencies and tertiary institutions.

Our 2,500 people come from culturally and geographically diverse backgrounds, with more than 60 nationalities across our business. We take great pride in this diversity and celebrate and recognise it.

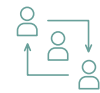
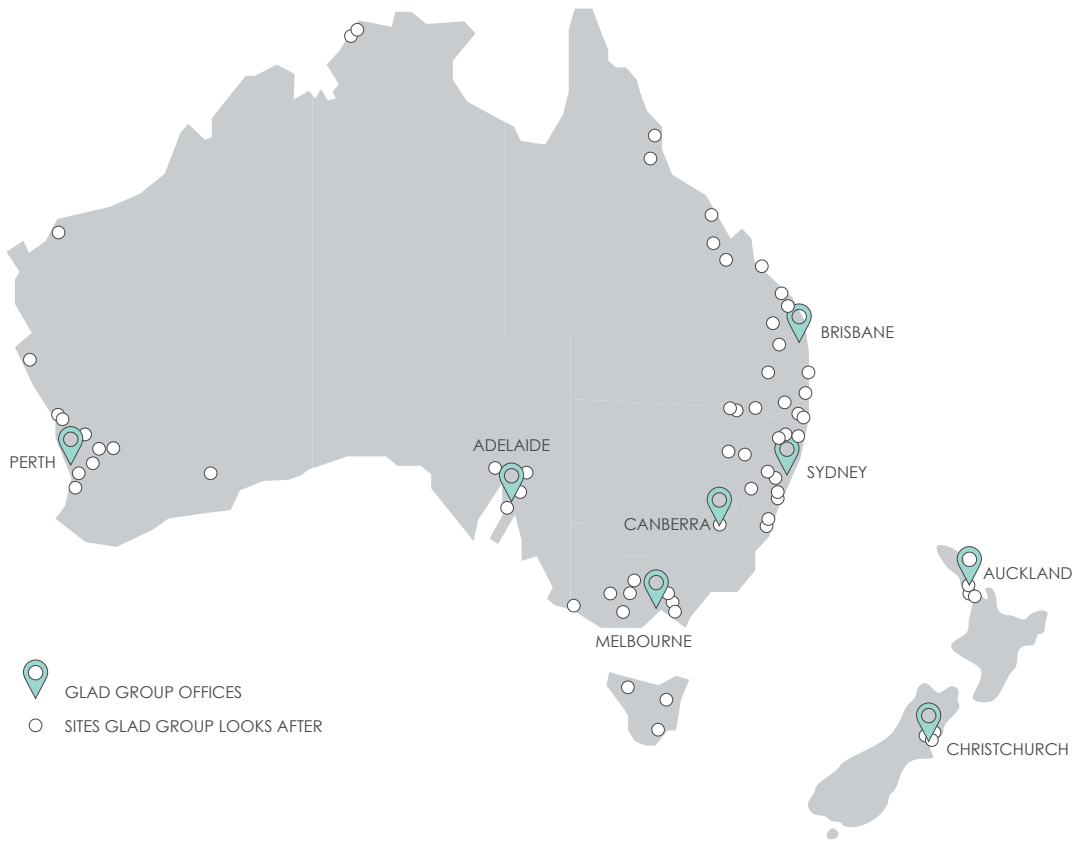
Products procured to deliver services include cleaning materials, cleaning equipment, bathroom and kitchen products, fleet vehicles, tools, materials, information technology supplies such as radios and mobile phones, electrical items such as light globes and electrical wiring, uniforms and personal protective 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. From a corporate perspective office stationery and supplies, furniture, IT equipment and professional services are procured.

Whilst 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 details on our supply chain profile see page 10.*





Our Locations



2,500
people based
at client
assets



2
global locations -
Australia & New
Zealand



400
sites
managed by
Glad Group

For more information about our business refer to gladgroup.com.au





Update of actions from our previous statement

In our first Modern Slavery Statement, we looked ahead to the activities we planned to undertake in FY2021. Below is a summary of our progress:

Policy & engagement

In FY2021 we developed and delivered training for our people to increase their understanding of modern slavery and the risks within our business and supply chain. This included training for all of our people as well as more detailed training on Modern Slavery legislation and requirements for our senior people. *Read more on page 12.*

We engaged with non-government organisations, including the United Nations Global Compact, to ensure we remained up to date on leading practice. Importantly we continued our direct engagement with high priority suppliers, sharing knowledge and training, building greater transparency of the supply chain beyond tier one suppliers and sharing resources and information, for example those shared by the Supply Chain Sustainability School.

Identify & assess risks

We undertook a detailed mapping and assessment of modern slavery risks and delved deeply into our supply chain, adopting a risk-based approach to understand where our greatest potential risk of modern slavery will be. *See page 8 for more details.*

This included reviewing our supplier risk assessment framework and due diligence approach and developing a Self-Assessment Questionnaire to help us understand more about our suppliers and their potential risk profiles. *Read more on page 16.*

Take effective action

Throughout the year we integrated all learnings into our processes and procedures and began to include modern slavery requirements in standard on-boarding and contractual requirements across our supply chain.

Track & monitor

During FY2021 we began to explore in more detail how we better measure the effectiveness of our actions. *See page 20 for more details.*

Communicate & report

We have annually reported on our progress and learnings through our Modern Slavery Statement.

Remediate

We commenced development of a remediation policy and framework, in the event of the identification of an adverse human rights impact. *Read more on page 18.*

We are committed to continuing to build on these activities. *See page 21 for our planned activities in 2022 and beyond.*



Glad Group's approach to assessing and governing modern slavery risk

Our approach

First and foremost, this is about people, and we put those people and the potential impacts to them at the heart of our approach. At Glad Group, modern slavery is considered in the broader context of Human Rights and labour rights. This approach is articulated in our Human Rights Commitment and is supported by our Code of Conduct, and various People & Culture policies including Diversity, Equal Employment Opportunity and Discrimination, our Anti-bribery and Corruption policy, and our Sustainable Procurement Policy and Supplier Code of Conduct. These policies are publicly available at gladgroup.com.au

Our approach continues to be aligned to the UN Guiding Principles on Business and Human Rights:

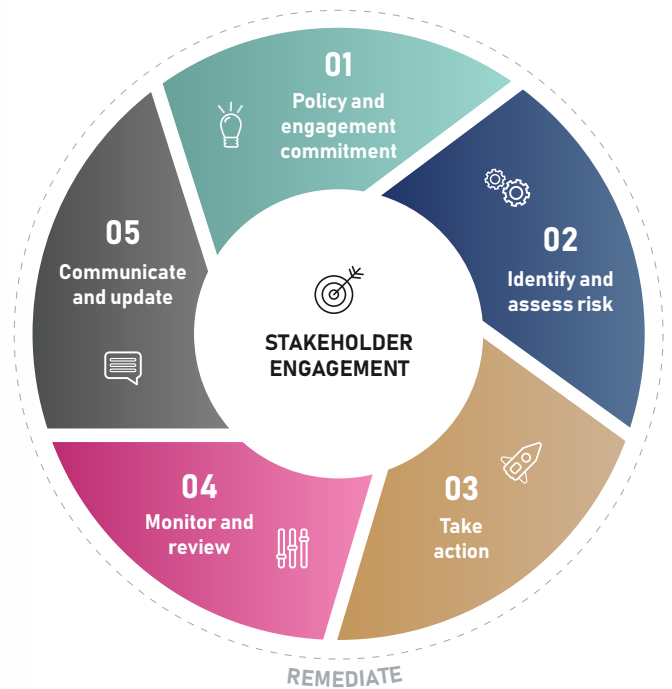
We are focused on building our capability and extending our reach over time, adopting a risk-based and continuous improvement approach to enhance transparency, understanding and management of modern slavery risks.

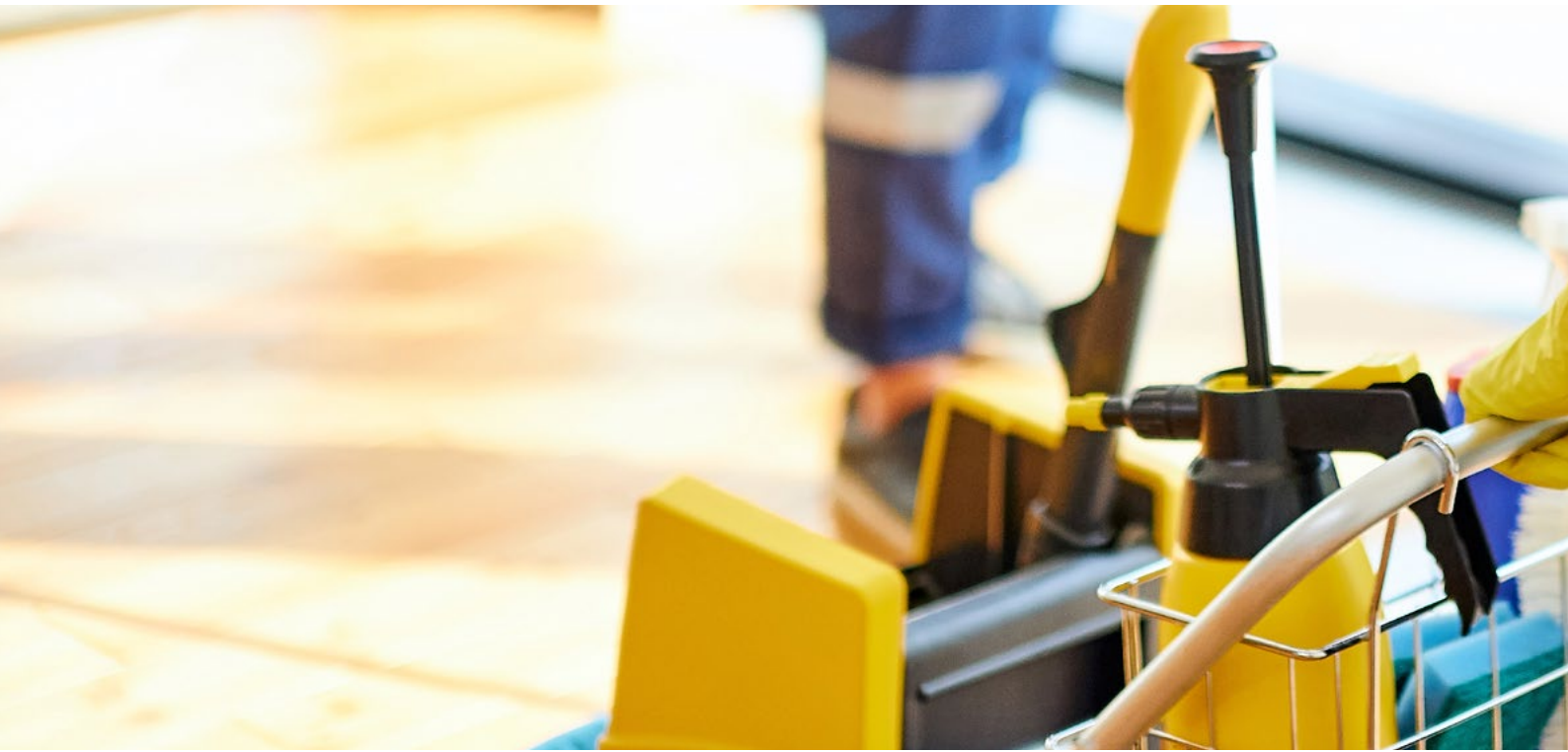
Within the business we have brought together our experienced and specialist Risk & Compliance, Sustainability and People & Culture teams to bring this approach to life and develop and implement connected and holistic actions that we embed into everyday processes and procedures.

Our governance

Glad Group has established robust corporate governance structures and we leverage this to oversee our human rights and modern slavery approach and deliverables.

No single action can eliminate the risk of modern slavery. These governance structures support us to remain vigilant that our strategies and actions continue to evolve and grow.





Risks of modern slavery practices in our operations and supply chains

Glad Group actively monitors the risk of modern slavery in our operations and supply chain, understanding that our business activities could cause, contribute to, or be directly linked to modern slavery².

In 2021, Glad Group built upon the initial risk assessment that we had conducted in the previous year. We undertook a more detailed risk mapping for our own operations and supply chain, adopting a risk-based approach which directs us to focus our resources and actions where we have identified the greatest potential for modern slavery risk. To do this we have drawn on credible publicly available resources and globally recognised forums including Cleaning Accountability Framework, Walk Free, and United Nations Global Compact resources.

We have identified that supporting labour rights and the safe working conditions for workers both within our own operations and supply chain are the key areas of focus.

We understand that breaches in these areas can be an early signal of worsening conditions for people, and could be a precursor to incidents of modern slavery.

Our operations

Whilst our business operations are conducted in what are considered low modern slavery risk geographies, the cleaning and security industries are regularly identified as having a higher potential for modern slavery risk. This is due to these industries attracting more vulnerable workers, for example migrant workers or workers for whom English is not their first language. While migrant workers make up a small proportion of the global workforce, it is likely that they

represent a disproportionate number of global instances of forced labour³.

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 industry in Australia.

Such issues have stemmed from an industry where customers have inflated expectations and demand excessive compliance. With low margins the cleaning industry has therefore been tight on resources resulting in complex supply chain structures.

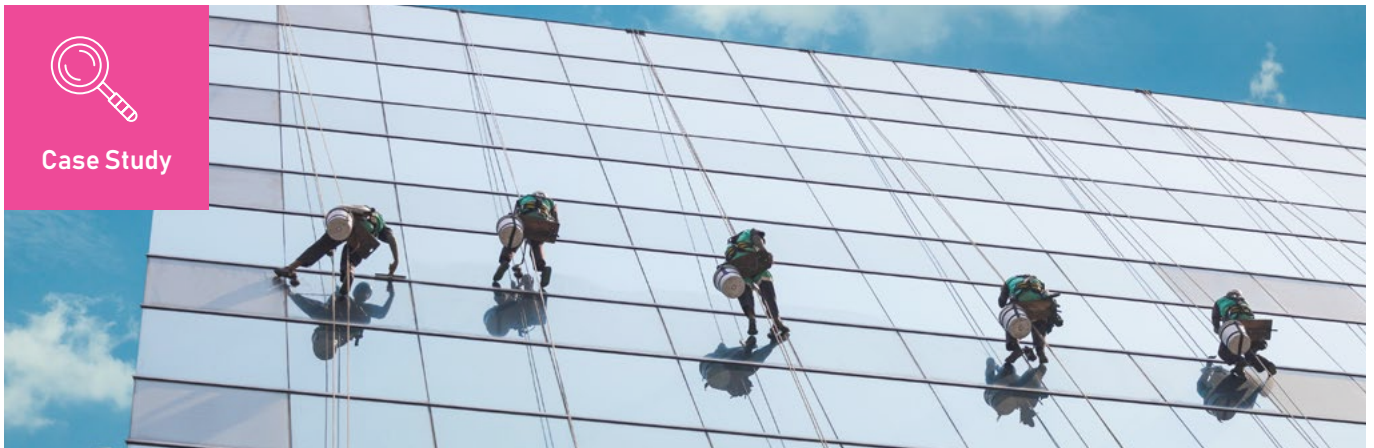
We are acutely aware of these potential risks and are clear in our commitment that all our people have a right to fairly paid work, should feel safe and are respected, having freely chosen to be with us.



2. UN Guiding Principles on Business and Human Rights.
3. "Migrants and their Vulnerability", IOM, 2019.



Case Study



The True Cost of Shaving 2% off the price

There is a significant rise in expectations for the property services industry to be providing their services in the most socially conscious and environmentally friendly way possible. For many organisations in the industry, this rise in expectations is welcomed and there is a great desire to continue to learn and grow, and seek new and innovative ways of doing things to drive positive environmental, social and governance outcomes

But it must also be remembered that adopting these practices and policy guidelines takes time, resources and comes at a cost. This cost applies increasing pressure on service providers, and the demands to manage this compliance must be considered by our stakeholders when seeking to engage our services.

It's a simple equation: for a business to deliver great service in a sustainable 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. Sustainability initiatives must be sustainable – and the cost of compliance must be shared.



Our supply chain

Glad Group considers that the risk of exposure to modern slavery practices in our supply chain is greater than in our own operations.

The activities that we have undertaken to date seek to obtain a greater understanding of these potential exposures in order to perform more targeted supplier risk assessments across our supply chain.

The potential risks that we have identified include suppliers:

- not adhering to appropriate and fair labour standards.
- applying insufficient or dangerous health and safety processes and procedures.
- providing unfair pay, working hours or lack of entitlements.

In addition, there are the potential risks of child labour, forced labour or a lack of freedom of association in the supply chain.

We understand that we could contribute or be directly linked to an adverse human rights impact via our supply chain, for example if we put pressure on our suppliers to deliver a product or service below a reasonable price, or within an unreasonable timeframe. It is our responsibility to act in a fair, ethical, and consistent manner with our suppliers. This includes undertaking due diligence to ensure that we partner with suppliers that share our values and approach and for whom the mitigation of modern slavery risk is a priority. Consequently, we have delved deeply into our supply chain to understand exactly where we should be prioritising our focus for more understanding and transparency.

In 2021, we completed a modern slavery supply chain assessment of our suppliers over the last 2 years. 424 directly engaged suppliers were identified in 2021, which were ranked into five different categories. The assessment was used to prioritise our focus for future supplier risks assessments.

As a result of this assessment, 21 Category A and 45 Category B priority suppliers were identified. These suppliers make up approximately 88% of Glad Group’s annual procurement spend.



How labour hire suppliers support our business

On occasion, Glad Group relies on labour hire suppliers to support business operations. This tends to be for ad hoc services; technical and/or specialised cleaning services, technical and/or specialist maintenance services, security and guest/concierge services as well as remote or rural customer locations.

The level of labour hire suppliers undertaking these services has decreased significantly from the previous year, from 64% of our spend to 42% of our total spend. Where labour hire suppliers are used, it is done so with the explicit approval of the relevant customer in all instances.

Glad Group works with a limited number of labour hire suppliers and is ensuring that there are executed agreements in place with each of them.

Many of these businesses are small to medium sized business owners and they play a key role in providing employment opportunities for their local communities. This labour plays an important role in our business model and enables us to be flexible when needed.



Supply Chain Assessment Profile

	FY2019-2020		FY2020-2021	
Number of direct suppliers (Tier 1)	418		424	
Supplier Type	No. of Suppliers	% of Spend	No. of Suppliers	% of Spend
Category A Large Value Procurement - \$500,001 and above. The Global Slavery Index 2018 Hot Spot Industries, all International Suppliers & Labour Hire Services	20	77	21	66
Category B Large Value Procurement - \$100,001 to \$500,000	35	13	45	22
Category C Medium Value Procurement - \$20,001 to \$100,000	85	7	80	8
Category D Small Value Procurement - \$5,001 to \$20,000	90	2	108	3
Category E Low Value Procurement - \$0 to & \$5,000	188	1	170	1
Country of origin				
Australia	418	100	424	100
International	0	0	0	0
Category type				
Goods & services	402	36	408	58
Labour hire suppliers	16	64	16	42
Length of relationship ⁴				
Less than a year	14	4	0	0
1-5 years	293	33	324	76
6-9 years	99	62	92	22
10+ years	12	1	8	2
Business type				
Small business ⁵	393	94	396	93
Large business	25	6	28	7

Glad Group has used the following criteria to identify suppliers at a higher risk of modern slavery:

- Large value procurement - \$100,001 and above.
- The Global Slavery Index 2018, top five products at risk of modern slavery.
 - Garments used to produce uniforms
 - Electronics manufacturing and materials.
- All international suppliers.
- Labour hire services.

Any suppliers within these products and services categories have been included in Glad Group's priority category A or B level of supplier.

These priority suppliers are being invited to complete our Supplier Assessment Questionnaire during the next 12 months, enabling Glad Group to collect more information on their approach to managing modern slavery and other risk.

We recognise that this approach must be extended to all of our suppliers, irrespective of spend, and beyond our Tier 1 suppliers and in the coming year we will begin to do this. This is a complex process and will take time, but we recognise the importance of taking these steps which will provide a level of transparency that is important to mitigating modern slavery risk.

4. Data available since 2012.

5. Defined as suppliers with whom Glad Group spends under \$250,000 per year.



Actions taken to address modern slavery

We have put in place robust policies, processes and procedures to support the labour rights of our own people and provide a safe and healthy working environment for them.

Our Values



TRUST



RESPECT



INTEGRITY



INNOVATION

We are working closely with our suppliers to understand the approach they take and, where possible, are using our purchasing power and influence to drive them to adopt the same level of rigour that we adopt within our own business.

We adopt a continuous learning approach to modern slavery to ensure the actions that we take reflect best practice and are effective. We work in collaboration with industry-wide and global initiatives to promote a coordinated and scalable approach to modern slavery.

We are a signatory to the UN Global Compact and also a partner of the Australian Supply Chain Sustainability School, which provides free sustainability resources to the property, infrastructure and construction sectors.



Supporting our suppliers



Case Study

Glad Group is a partner of the Supply Chain Sustainability School.

The School is a not-for-profit initiative that aims to create more sustainable supply chains for the property, construction and infrastructure industries in Australia. They do this by providing free learning resources to support upskilling in the built environment sector.

We understand that suppliers are some of our key business partners and we want to support them and help them build their understanding and capability to manage key sustainability issues, including the risks of modern slavery.

This work represents the start of what will be a long journey in building supply chain transparency. We know that requests for additional information can be a burden and sometimes intimidating, and remain committed to working with our suppliers, sharing resources and building capability and understanding. We also understand that our level of influence will vary; where we represent a significant proportion of business, our influence will be high; where it is very small and we don't have influence, we will instead be proactive in working with companies that have a proven track record of taking action.

supplychainschool.org.au



Our operations

At Glad Group we recognise we are a people-first organisation. The services we offer to our customer partners are the direct result of the labour, contribution and participation of our people.

We are committed to ensuring our people are treated with respect and that their contributions are valued, recognised and fairly rewarded. Not only is this a basic human right, it is also fundamental to our service methodology: valued and respected people are more engaged, and more productive.

We have established a clear policy framework to address human rights issues in our workforce, supported by robust processes that have been designed to meet or exceed all legal and compliance requirements. This includes:

- Our policies (written in plain English) are developed and regularly reviewed to ensure they support a high standard working environment so that our people can perform their jobs safely, and for which they are remunerated fairly and appropriately.
- These policies are made available to all our people via our company intranet and are also communicated regularly to ensure they remain top of mind. For example, at team meetings or through our internal communications channels.
- Formal training on our human rights and modern slavery policies is provided.
- Implementation of these policies is lead from the top; they are visibly supported by our Advisory Board, Executive Director and Senior Management team.
- Adherence to our policies is managed through allocating responsibilities and accountabilities, as well as implementing processes and controls to support them.
- All policy implementation is overseen by our Risk & Compliance function and broader governance forums.
- Key performance indicators are included in the Glad Group scorecard for regular review by Senior Management and the Advisory Board. For example, this includes reporting on whistleblower incidents and themes, and feedback from stakeholders





Our operations (continued)

Our hiring practices and induction processes support applications for candidates of all backgrounds. However, we are very clear about the information that must be provided by people joining our business before they are hired. All new starters must provide details of their date of birth, and this information must be verified with identification that confirms their working rights within Australia and New Zealand.

On joining Glad Group:

- All new people receive information on key policies (including modern slavery) and training to ensure they can perform their role in a safe manner (for example, in the safe handling of chemicals).
- All permanent people receive a contract of employment that clearly articulates compliance with the Modern Award or Enterprise Bargaining agreement, as relevant, covering wages and entitlements.
- We acknowledge that everyone has the right to freedom of association in the workplace and with others, including the right to join or leave a group voluntarily for the protection of their interests.
- We maintain robust internal policies, systems and processes to comply with our legal and contractual obligations and to manage entitlements relating to our people irrespective of their employment type.



Glad Academy

With a workforce located in many different locations, the training is delivered through our on-line Learning Management Platform, Glad Academy, which also enable us to track training completion rates.

We also test understanding by requiring our people to complete questions at the end of the training. For example, with our modern slavery training all of our people were asked to confirm what it is and identify how they could raise an issue or concern.



Throughout their career at Glad Group, our people will:



Complete ongoing training

This covers important topics related to the work we do every day, including our commitment to acting ethically and responsibly. Training includes key obligations under our Code of Conduct, legal and regulatory obligations and how to stay safe at work, as well as specific Human Rights and modern slavery training.

As at 30 June 2021, 100% of Glad Group's Senior Management team had completed comprehensive modern slavery training provided by the Supply Chain Sustainability School.

Mandatory modern slavery training has also been rolled out through Glad Academy to commence engagement across the entire workforce on what modern slavery is, what it might look like and what to do if it is suspected. It has been important to design this training to be visual and easy to understand to ensure that our diverse workforce understands it. This year 70% of our people have completed this mandatory training, which will be built on in the coming period.



Have access to our People & Culture programs

These programs are designed and implemented by our People & Culture team to promote diverse and inclusive workplaces which are free from discrimination, bullying and harassment; support good health and wellbeing including through flexible working arrangements to ensure work-life balance; and encourage learning, development and equal opportunities. These programs collectively help to create a workplace that supports our people professionally and personally and minimise the risk of modern slavery practices.



Have access to our Whistleblower approach

Have access to our Whistleblower approach to reinforce that all our staff have another way of raising any concerns they might have if they do not feel comfortable taking a more informal route via their manager, or perhaps more formally through People & Culture.



Have access to our Employee Assistance Program

Our Employee Assistance Program is there to provide any support required by our people.



Have significant contact with the Senior Management team

Our Senior Managers are hands on and attend site regularly, seeking feedback from our people.

At a broader business level:

- We continue to participate in customer-led independent auditing and have commissioned specific audits of our business.
- 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. All tendering is conducted by an experienced team with a deep knowledge of all requirements.

As a result of these actions, Glad Group has assessed the risk of modern slavery in our operations to be low because the workforce is in Australia and New Zealand, and we have in place robust People & Culture policies and procedures and independent grievance mechanisms.

However, given the nature of our business, we are vigilant and seek feedback regularly from our people on wellbeing and concerns.



Our supply chains

Our procurement team works closely with our suppliers to source goods and services in a manner aligned with our policies and expectations.

Supplier self-assessment covers:



Corporate background information



Corporate governance



Business conduct and ethics



People



Supply chain and modern slavery



Compliance



Outstanding issues

We require that suppliers formally acknowledge and comply with our minimum standards articulated in our Sustainable Procurement Policy and Supplier Code of Conduct. We encourage them to build capacity and understanding that translates into practice regarding the management of the many different risks that could impact their business.

It is through our supplier due diligence processes that we assess their level of compliance with our policies and minimum standards. We have continued to build on these processes (supply chain assessments), explicitly including human rights and other environmental, social and governance factors into our supplier chain assessment framework for onboarding of new suppliers also for assessing existing suppliers.

Consequently, our pre-qualification and on-boarding process requires that all new suppliers complete a comprehensive Self-Assessment Questionnaire (SAQ), which includes detailed questions on human rights and modern slavery identification, mitigation and management practices. This information informs our approach to future engagement with a particular supplier, including whether more information or verification is required.

Where SAQ information provided is insufficient or the level of action is not considered appropriate, the supplier is required to address the gap within a reasonable timeframe. If a supplier is not willing or able to address an issue, as a last resort we have the option to exercise our right to terminate the agreement. It is though our intention to work with and build the capability of suppliers wherever possible.

The SAQ forms part of an on-going risk identification and assessment approach for our suppliers and we will be asking them to review their SAQ responses annually with a view to adopting a continuous improvement approach.

This approach is being supported by increased engagement with our suppliers and we have stepped up the regularity of meetings that we hold with them. Contractual obligations compliance and performance is discussed at these meetings. The agreements that we have with our suppliers also include enhanced provisions and requirements regarding modern slavery and subcontracting practices, and a requirement to comply with Fair Work Australia regulations.

We intend to implement a framework for verification of supplier Self-Assessment Questionnaire responses in the coming year.

Sitting behind these minimum requirements is a broader approach to the factors assessed when taking on a new supplier; while cost remains an important consideration, the Glad Group tender process has greater weighting towards an organisation's quality of product, sustainability and worker safety credentials. This is about seeking business partners that understand their responsibilities and impacts, and that are aligned with our values and approach.





The COVID pandemic

Glad Group recognises that the COVID-19 pandemic may expose our people and supply chain to additional risks.

In response, we have worked closely with our people and suppliers whilst consulting with industry groups and peers to identify and address potential issues.

Specific actions we have undertaken:

- Working with our people and suppliers to protect everyone from COVID-19, including the provision of personal protective equipment.
- Where possible, enabling the redeployment of people to alternate sites or roles to mitigate the impact of workforce reductions.
- Working with people and suppliers to facilitate the job sharing of roles.
- Supporting people under the Federal Government's Job Saver program.
- Working with people to utilise long service or annual leave.
- Continuing to implement scheduled award wage increases across our people including the introduction of our annual remuneration program for salaried staff.
- Avoiding procurement practices that may increase modern slavery risk, such as requiring short production timeframes, seeking excessive discounts and unnecessary discretionary ordering.



Grievance and remediation mechanisms for Glad Group's operations and supply chain

A response to modern slavery is not complete without an accessible and trustworthy grievance mechanism. All of our people are responsible for reporting or resolving an issue as soon as it is detected, before it has the opportunity to escalate.

As an organisation we are ready to hear about any grievance raised and have allocated responsibilities internally to ensure this happens in a consistent and appropriate manner. Our Head of People & Culture oversees the approach with support from nominated (and trained) Whistleblower Disclosure Officers nominated from around the business. We encourage our people and suppliers and their employees and relatives, spouses or dependents of anyone listed to make a report about potential misconduct, which includes but is not limited to potential human rights and modern slavery issues.

Whilst we actively encourage our people to speak up, it is imperative that we remain focused on building understanding and awareness of human rights and encourage people to voice their concerns in confidence without fear of retribution. We recognise that migrant workers, women and members of other vulnerable groups often face individual or group-specific barriers that prevent them from accessing an effective remedy. These community members make up a significant portion of our people so we have worked hard to ensure that our approach is accessible to them by regularly communicating and using different forums and formats.

Glad Group has both formal and informal grievance mechanisms to identify and escalate issues in line with our Whistleblower Policy, ensuring that they are resolved in a fair, equitable and prompt manner.

Reports and concerns can be made to a person's Line Manager or our People & Culture team. However, if a person is not comfortable to do this, they can make a report via our independent whistleblower provider, either on-line, in person or over the phone. Irrespective of how they are raised, reports can be made anonymously and remain confidential. Once received, the information is reviewed to determine the next steps. This might include the commencement of a formal investigation, which is performed in line with Glad Group's investigation guidelines, with an experienced (and independent) investigative lead appointed.

If the investigation reveals that the grievance is valid, then specific actions will be determined depending on the nature of the issue. Should there be an issue of modern slavery, first and foremost protections for the victim(s) will be put in place to ensure they are physically and mentally safe. Actions for the offending team member involved range from training being provided through to dismissal.

We adopt a continuous improvement approach by monitoring the use of our whistleblower channels, the issues being raised and their resolution. These insights are used to update and adapt policies and processes, and even the grievance processes themselves to ensure they are truly trusted, accessible and effective grievance mechanisms.

Redressing a grievance

Whilst formally the expectations of remedy will depend on whether Glad Group has caused, contributed or been directly linked to an adverse human rights activity, Glad Group is committed to being proactive and taking action wherever we have influence. We adopt a human-centric approach to remediation, with the protection and remediation of the victim(s) the priority.

Where the business does not cause or contribute to a human rights or modern slavery issue but is directly linked to the harm (for example, through a supplier), then we will use our influence to prevent or mitigate the harm from reoccurring, and to ensure the person harmed is remediated⁶.

Should we detect modern slavery within our own business operations, our actions would be swift to verify and investigate the issue, understand the cause, and resolve that as soon as possible, ensuring an appropriate remedy to any harm suffered.

If we were to detect a non-conformance in our supply chain, we will work closely with that supplier to develop a corrective action plan to resolve the identified issues. Suppliers must identify root causes and implement actions within specific timeframes.

As with our grievance approach, any remediation undertaken will be monitored and evaluated. This allows us to adjust corporate policies and due diligence approaches to better respond to the realities on the ground.



6. Remediation can take many forms and will depend on the individual's needs.

Key steps for inclusion in the remediation process include:

01

Safeguarding the victim

02

Engagement of experts for support and referral to authorities

03

Support and remediation for the victim

04

Corrective actions to prevent the situation from occurring again



Assessing the effectiveness of our actions

It is difficult to assess the impact of any one action, so Glad Group has identified the following as key components of an effective response to modern slavery.

Key components of an effective response to modern slavery:

- Clearly defined roles, responsibilities and accountabilities.
- Our stakeholders (both internal and external) clearly understand our expectations of them with regard to modern slavery.
- We have processes in place to facilitate early identification of instances of modern slavery, including trusted and accessible grievance mechanisms in place that our stakeholders can use to raise issues.
- Our subsequent interventions achieve the outcomes of non-recurrence and appropriate remediation for the victim(s).
- A continuous improvement approach is adopted – we regularly receive feedback and learn from it, adjusting our policies and approach accordingly.

This means asking ourselves, and seeking feedback on, answers to the following kinds of questions:

- Do our stakeholders really understand what modern slavery is and the actions that we expect them to be undertaking?
- Are our due diligence processes robust enough to identify issues (early) so that they can be addressed?
- Are the actions we implement really going to ensure that it can't occur again? Are we getting the right advice on these?
- Are our people really comfortable to use our whistleblower hotline? Do they have confidence that we will respond in the way they would like us to?

These are difficult questions that we cannot answer overnight, and how we measure the effectiveness of our actions is evolving over time.

Actions we have taken to date include:

- Allocating accountabilities and setting clear expectations through our policies and performance metrics with both internal and external stakeholders.
- Engaging openly with our people and suppliers and seeking their feedback.
- Embedding better practice into existing processes and procedures.
- Using our corporate governance structure to regularly assess our performance at addressing risks of modern slavery across our operations and supply chain.
- Reviewing the number and type of grievances received.
- Completing self-assessment questionnaires as requested by our customers.

We know we need to do more. We have begun to develop a more formal framework of assessment, that identifies qualitative and quantitative performance metrics that we can measure to enable us to assess the effectiveness of our actions more rigorously.

For each key component that we have identified, we are articulating intended outcomes, the actions that we must have completed to achieve that outcome and the metric that we will measure to assess achievement.



Roadmap: next 12 months and beyond

Looking ahead, we plan to undertake the following actions in FY2022 and beyond:

Policy & Engagement

Review and assessment of policies guiding our approach to the identification and mitigation of human rights and modern slavery risks.

Develop and deliver the continuing training pathway for our people including a formal learning and development framework for all our people.

Formalise our approach to engaging with our people, customers and suppliers to request and receive feedback.

Identify & assess risks

Build a deeper understanding of our suppliers through our Self-Assessment Questionnaire approach, including the introduction of a verification framework.

Execute new supplier agreements with updated terms and conditions with our labour hire suppliers.

Carry out detailed assessments of our category A & B priority suppliers.

Working with our suppliers to map the supply chain beyond Tier 1 (Tier 1 being the suppliers we directly engage).

Take effective action

Continue to integrate the learnings into processes and procedures within Glad Group and improve our modern slavery risk review process.

Engage with industry peers and non-government organisations to understand leading practice and explore potential future opportunities for collaboration.

Track & monitor

Further develop our framework of assessing the effectiveness of our actions.

Track our modern slavery performance metrics through the Glad Group scorecard.

Implement a supplier management framework with our Category A & B suppliers.

Communicate & report

Annually report on progress and learnings through our Modern Slavery Statement.

Remediate

Continue to build our remediation framework, including identifying a community partner to support this.



GLAD GROUP[®]
INTEGRATED PROPERTY SERVICES

Contact Us
gladgroup@gladgroup.com.au
gladgroup.com.au
1300 283 233