

MODERN SLAVERY STATEMENT



2020



GLAD GROUP[®]
INTEGRATED PROPERTY SERVICES

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What is modern slavery?

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.

Purpose of this Statement and Consultation with Controlled Entities

This statement, in line with the Australian Modern Slavery Act 2018 (Cth), sets out the actions taken by the Glad Group to address modern slavery risks in our business operations and supply chain for the financial year ending 30 June 2020. This will be reviewed and updated annually.

This Statement covers Glad Group Pty Ltd trading as Glad Group Commercial Cleaning, Glad Cleaning Service Pty Ltd trading as Glad Retail Cleaning, Glad Security Pty Ltd, Glad Maintenance Pty Ltd and Mutual Cleaning and Maintenance Pty Ltd. Glad Group entities operate across Australia and New Zealand. Employees of these companies form part of the Glad Group of employees.

The Directors of these businesses, Governance Committee and Senior Managers of these businesses have contributed to and reviewed the content of this Statement.

On the 8 March 2021, this Modern Slavery Statement was approved by Glad Group's Advisory Board, acting as the principle governing body for all Glad Group companies. This statement is signed by Nick Iloski, as chair of the Advisory Board and Managing Director of all Glad Group companies.



Statement from our Managing Director

I am pleased to present Glad Group's first Modern Slavery Statement.

Modern slavery is a complex issue that cannot be solved without commitment from business, government and society together. At Glad Group we recognise our responsibility and the opportunity to help eradicate modern slavery and so have welcomed the modern slavery Act 2018 (Cth). Our core values of Trust, Respect and Integrity underpin how we manage our business operations and how we approach the relationships that we have with our people, our business partners, our suppliers and the broader community. In turn, these values inform the expectations that we have of our business partners and suppliers, about how they conduct and manage their relationships with their stakeholders.

As a provider of cleaning, security, concierge and maintenance services, we recognise that these industries are considered to have the potential to pose a high level of risk regarding modern slavery. We are addressing this through good governance, transparency and holding ourselves and our business partners to the highest ethical standards. For example, we understand the importance of responsible procurement and ensuring that environmental, social and ethical considerations are considered when making procurement decisions. Our suite of People and Culture policies, our Human Rights Commitment, Sustainable Procurement approach and Supplier Code of Conduct guide how we manage modern slavery risk and embed sustainable practices into our day to day operations.

We know that today there are more than 40 million people living in modern slavery¹, with many of them working in the supply chains of the businesses that operate around the globe to provide the goods and services we buy and consume. And, with the COVID-19 crisis affecting health and economies around the world, the most vulnerable in society are now under additional threat. It is therefore imperative that we come together and take action to work towards eradicating this terrible issue.

This is a time for us to be bold and ask the difficult questions. Any form of modern slavery is unacceptable and all of us at the Glad Group are proud of the steps we are taking as a business to assess and address the risk of modern slavery within our operations and supply chain. We have developed a Modern Slavery Action Plan which is governing and guiding our next steps and we will continue to build on these actions and keep up to date with industry and international best practice approaches through collaboration with our suppliers, peers and specialist advisors.

Everyone has the right to live a free and equal life, and so we need to come together to do everything that we can to deliver on this vision.

Nick Iloski
Managing Director
Glad Group



Everyone has the right to live a free and equal life, and so we need to come together to do everything that we can to deliver on this vision.

Nick Iloski
Managing Director

OUR VALUES



TRUST



RESPECT



INTEGRITY



INNOVATION

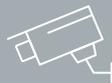




About Glad Group and our operations

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

Our Services

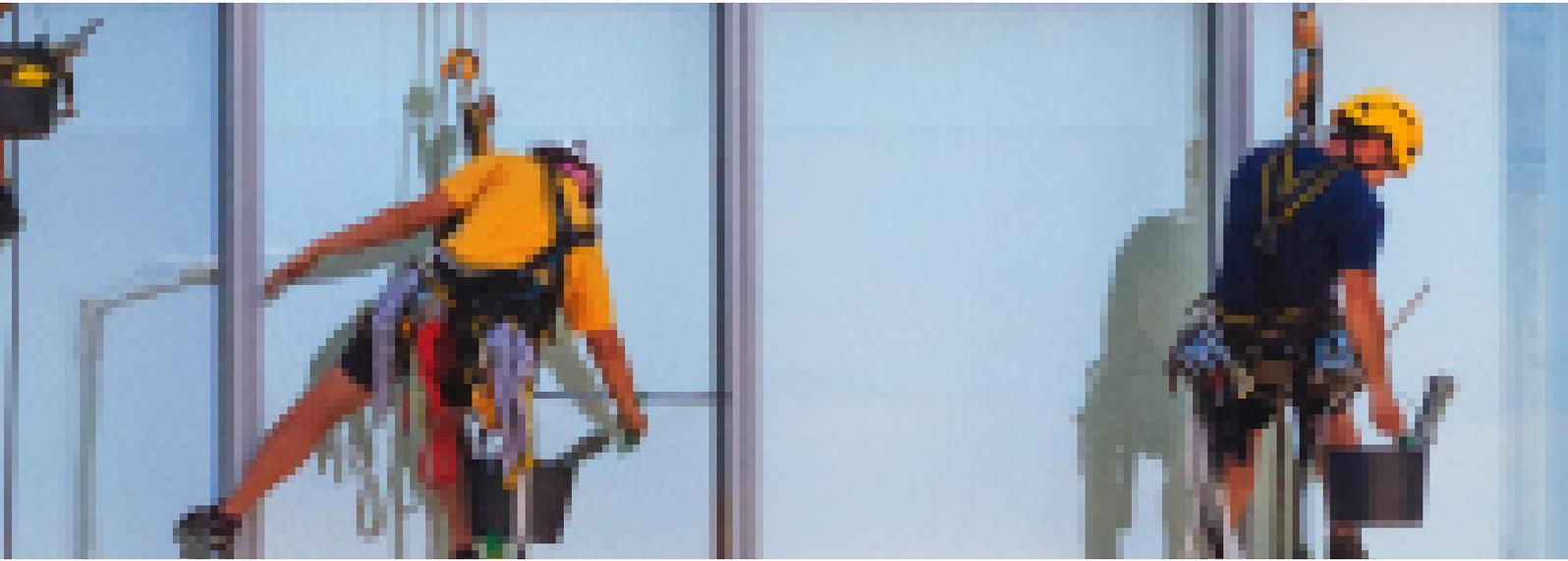
 Cleaning	 Security	 Maintenance	 Concierge	 24/7 Help Desk
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Glad Group’s accredited Integrated Business Management Systems (IBMS) underpins all aspects of Glad Group’s business, combining functions relating to the quality of the service, work health and safety standards and environmental management. The IBMS is designed to support and continuously improve our integrated property services model, in compliance with relevant legislation, regulations, codes of practice, and to the applicable standards.

2020 Highlights

 Built our understanding of modern slavery risk	 Became a signatory to the United Nations Global Compact and a partner of the Supply Chain Sustainability School, participating in knowledge sharing and capacity building forums	 Improved our governance, policies and processes by: <ul style="list-style-type: none"> • Introducing our Human Rights Commitment • Making our expectations of our people clear by revising our Code of Conduct • Making our expectations of suppliers clear by revising our Sustainable Procurement Policy and Supplier Code of Conduct 	 Undertaken a supply chain mapping, risk and spend analysis	 Enhanced our engagement with key higher risk suppliers, including introducing our supplier risk assessment questionnaire as part of our supplier due diligence process	 Commenced internal employee engagement and training program	 Refreshed our sustainability strategy, with Responsible Business practice as a key focus
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Glad Group's headquarters are located in Rockdale, NSW, with a total of four State-based offices.

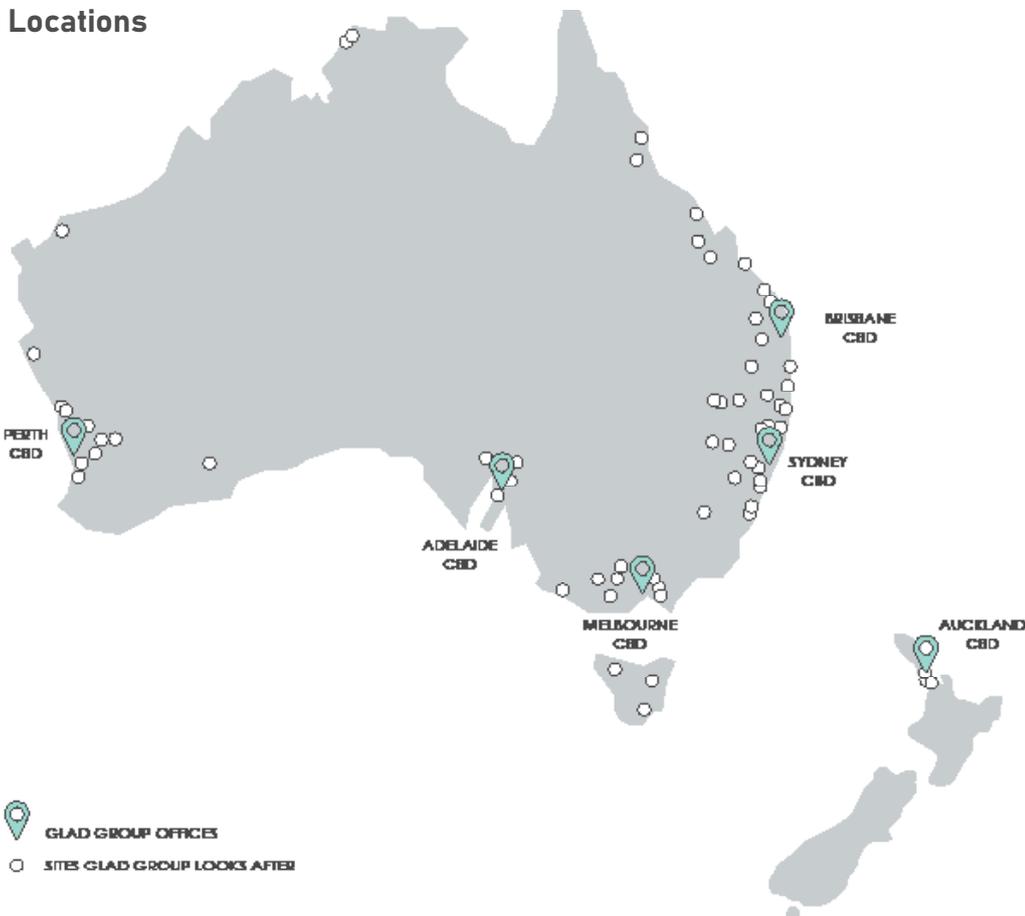
We have more than 2,500 people based at client assets around Australia and have recently expanded into New Zealand. These people are either directly employed as permanent employees, or in some cases as casual support staff to meet variable operational demands. Our clients include ASX listed property companies, government agencies and tertiary institutions.



2,500

people based at client assets

Our Locations



2

global locations - Australia & New Zealand



400

sites managed by Glad Group



Our approach and commitment towards human rights and addressing modern slavery

Our approach to human rights and modern slavery is articulated in our Human Rights Commitment and is supported by our:



Code of Conduct



People & Culture policies including Diversity and Equal Employment Opportunity and Discrimination Policy



Sustainable Procurement Policy and Supplier Code of Conduct

The Glad Group Sustainability Committee meets regularly and is responsible for the oversight of the implementation of these policies. The Sustainability Committee is responsible for providing updates to the Glad Group Governance Committee which provides oversight over all governance matters. All policies and procedures are consistent across all of Glad Group’s subsidiaries and operations.

In 2020 we became a signatory to the UN Global Compact. This reflects our ongoing commitment to driving sustainable outcomes and addressing key environmental, social and governance issues such as modern slavery.

We participate regularly in the Australian network and the ten principles of the UN Global Compact have underpinned our refreshed Sustainability Strategy.



Our supply chain

Glad Group has a diverse supply chain, working with large global suppliers through to smaller local suppliers. This network of suppliers has been built over time and is founded on trusted and open relationships.

Our suppliers can be split into the following categories relating to the delivery of our services:



Suppliers of products

- Cleaning supplies
- Equipment
- Bathroom and kitchen products
- Fleet vehicles
- Information Technology supplies such as radios and mobile phones
- Uniforms and personal protective equipment



Suppliers of services

- Technical or specialist cleaning services (such as high rise window cleaning)
- Specialist security services (such as mobile patrols)
- Labour hire for specific projects



Corporate services

- Office stationery and supplies
- Furniture and IT equipment
- Professional services (including legal, auditing and consulting services)

Whilst many of these suppliers are based in Australia, the products that they source will come from all around the world. We recognise the potential risk with respect to labour exploitation globally, particularly with regard to certain geographies and local contexts. Consequently, we are engaging with our suppliers to build shared understanding and commitment to the protection and promotion of human rights through their and our supply chains.



Understanding the risks of modern slavery in our operations and supply chain

Glad Group understands that our business activities could cause, contribute or be directly linked to modern slavery.

We have commenced our risk assessment by completing a review of our own business operations and suppliers, adopting a risk-based approach to identifying the highest-risk industries, categories or areas, and prioritising these for delving deeper and building further understanding and transparency. This has been supported by a detailed literature review and support from relevant experts.

In particular, we have used the following risk factors to inform our risk analysis:

- High risk geographies
- High risk business models
- High risk categories
- Materiality to Glad Group

Priority Risk Areas



Textiles used for the production of employee uniforms



Cleaning chemical suppliers



Cleaning equipment manufacturing



Electronics manufacturing and materials



Subcontracting/outsourcing of labour

Due diligence and addressing these risks

Our approach is informed by the UN Guiding Principles on Business and Human Rights. We know that due diligence is an on-going process and must be embedded into how we do business every day.



We also understand this is about continuous improvement and building our capacity and extending our reach over time, adopting a risk based approach, to enhance transparency and understanding of modern slavery risks. We cannot do this without our people – they have a key role to play in identifying, mitigating, managing and reporting on modern slavery risks and issues.



Across the business we have:

- Assessed the maturity of our policies, frameworks and systems and identified opportunities for improvement to ensure that our expectations regarding human rights are clearly articulated. This includes:
 - Updating our Sustainable Procurement Policy and Supplier Code of Conduct, setting out our explicit expectations for suppliers
 - Developing our Human Rights Commitment
 - Updating of Code of Conduct which defines our values and company-wide commitment to ethical business practices and legal compliance
- Undertaken a supply chain mapping, risk and spend analysis to guide the priority areas for further due diligence. This mapping and assessment will be completed annually.
- Enhanced our supply chain due diligence process by explicitly embedding modern slavery considerations within the existing procurement process, including adding to our supplier risk assessment framework to help identify greatest areas of risk. This applies to the assessment of a new supplier as well understanding the supply chains of our existing suppliers.
- Stepped-up our engagement with suppliers and encouraged them to build their knowledge and capability, through on-going face to face meetings and the sharing of information and knowledge building resources.
- Actively participated in relevant human rights focused collaborative initiatives including the UN Global Compact and Supply Chain Sustainability School, of which Glad Group is a partner.

The level of engagement from existing suppliers for more supporting information on their internal processes and supply chain is often reflected by their existing commitment to ethical practices and / or the size of the entity. We understand that these requests for information can be a significant burden for some of the smaller businesses that Glad Group works with, and are committed to working with them and sharing resources to help them build their level of engagement and capability over time.



Commitment to industry-wide capability and knowledge building

In 2020 Glad Group became 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. Partnering with the School means we are directly supporting a great resource and education platform, through which knowledge and great practice can be shared not only to the benefit of our suppliers, but also the broader industry.

supplychainschool.org.au



Due diligence within our own operations

Glad Group recognises that the cleaning and security industries are regularly identified as having a high potential for modern slavery risk due to the nature of the workforce. We believe that everyone has the right to work that is paid fairly, where they are safe and respected in the work environment, having freely chosen to be there.

Glad Group is a diverse business with employees from all walks of life and geographies. We celebrate this diversity and the different perspectives that it brings to our business and service offering.

In addition to the actions undertaken regarding our supply chain, as a business:

- We have reviewed and updated our People and Culture policies to ensure they clearly articulate our commitment to fair and equal treatment and the expectations of our people in bring these to life.
- We are transitioning to a full direct employment model for specialist services. In case of works being performed by a subcontractor, we have engaged an external auditor who conducts random audits of our contractors to ensure that payment conditions of our subcontractor employees are in accordance with the relevant legislation.
- We have refreshed our Whistleblower approach to reinforce that all of our staff have another way of raising any concerns they might have if they do not feel comfortable doing so directly with their manager.
- We have commenced employee engagement and training. Our training 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, Group Policies, legal and regulatory obligations and how to stay safe at work, as well as specific modern slavery training. This has included building management-level capability about human rights issues and supply chain risk management. We believe it is critical to build knowledge and understanding at these leadership levels of the business.
- We are committed to ensuring continuity of employment, particularly of cleaners, when there is a change of contract.
- We ensure that the relevant awards and Enterprise Bargaining Agreements (EBAs) are appropriately administered by employing a dedicated and experienced payroll team.
- We remain committed to the Cleaning Accountability Framework.
- We are participating in client-led independent auditing, and have commissioned specific audits of our business.

Our objective is to embed and integrate the identification and mitigation of the risk of modern slavery into our business as usual processes and procedures, so that it becomes part of our regular compliance requirements.



Subcontracting

On occasion, Glad Group relies on subcontract labour to support business operations. This tends to be for technical or specialised cleaning services, or for security services in remote or rural client locations. The level of labour subcontracting undertaken has decreased significantly over the last few years.

Where subcontracting is undertaken, it is done so with the explicit approval of the relevant client in all instances. Glad Group works with a limited number of labour hire providers, many of whom are small to medium sized business owners and play a key role in providing employment opportunities for their local communities.

In addition to the broader actions being undertaken to engage and build transparency in our supply chain, and to ensure that employees of these labour hire organisations are treated equitably and fairly, Glad Group is:



Enhancing systems

used to manage our contractors



Engaging with labour hire organisations

and implementing a supplier risk assessment questionnaire, the responses to which are being validated and may trigger additional requests for information or a compliance audit.

In the short to medium term Glad Group has committed to moving away from any need for subcontracting of labour towards a direct employment model for specialised services offered.

“

We believe that everyone has the right to work that is paid fairly, where they are safe and respected in the work environment, having freely chosen to be there.

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Assessing the effectiveness of our approach and actions

When taking action, it is important to understand the impact of our activities, to ensure they are achieving their intended outcome.

Glad Group regularly reports to, and participates in discussions and forums with our clients, for whom we form a key part of their supply chain, as well as with our suppliers, for whom we are at the top of their supply chain. This communication and dialogue ensures that we receive regular feedback on our actions.

We see this feedback as an opportunity to learn and grow our approach, with our Modern Slavery Action Plan revised to reflect best practice. For example, Glad Group responded to the Property Council of Australia's (PCA) Modern Slavery Questionnaire which included questions regarding knowledge and actions being undertaken to assess human rights and modern slavery risks. The questionnaire, developed by the PCA in collaboration with 14 other PCA members, has helped to inform our Modern Slavery Action Plan and priorities.

From a governance perspective, the cross-functional Sustainability Committee has been tasked with assessing and addressing risks of modern slavery across our operations and supply chain.

The Committee meets monthly and is responsible for driving collaboration across the business and ensuring the program of work is implemented appropriately. Their work is reported to and monitored by Glad Group's Governance Committee.





Our operations throughout the COVID-19 pandemic

The COVID pandemic of 2020 brought significant new challenges to not just the Glad Group, but business operations across Australia. The Glad Group as a provider of soft services to the commercial and retail property sectors was not immune to the contraction of service that resulted from unprecedented lock-downs and social distancing guidelines introduced to help manage the spread of COVID infection.

During the initial stages of the pandemic, Glad Group services across multiple retail and commercial properties were adversely impacted resulting in reduced hours for many staff members. Glad Group used the broad scope of our operational platform to re-deploy staff and support them with rostered hours where possible.

To avoid full stand-downs of staff, we worked closely with our people to share available hours across as many staff as possible to ensure jobs were protected to the best of our ability.

Glad Group maintained ongoing contact with our people via our online staff communication platform to ensure relevant, up-to-date pandemic information and opportunities were available in near real-time.

As pandemic conditions improved across Australia, Glad Group were progressively able to return people to full work engagement – with the vast majority of our 2,500 workforce returned to working pre-pandemic levels by early 2021.



Our approach to governance and remediation

We are focused on detecting and eliminating misconduct and promoting and supporting a workplace and relationships that drive our values of Trust, Respect and Integrity. This means creating a culture where people are comfortable to speak up. We will not tolerate victimisation of anyone who intends to disclose or has disclosed misconduct.

Our Whistleblower policy and approach, supported by our independent whistleblowing service provider WBS, enables whistleblowers to speak up in a supported and anonymous way. We actively encourage our staff to report potential concerns around modern slavery through this channel if they do not feel comfortable to do so to their direct manager. Concerns raised are subject to a robust and independent investigation process.

If we detect nonconformance in our supply chain, we will work closely with that supplier to develop a corrective action plan to resolve the identified issues. Suppliers will be required to identify the root cause and implement corrective actions within specific time frames.

We are adopting a human-centric approach to remediation, with the protection and remediation of the victim(s) as the priority.



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 compensation or remediation for the victim

04
Corrective actions to prevent the situation from occurring again



Looking ahead – continuous improvement

We recognise how important it is to continue to focus resource and actions of reducing the risk of modern slavery in our operations and supply chain. Looking ahead, we plan to undertake the following actions in 2021 and beyond:

Policy & Engagement

Continue to develop and deliver training for our people to increase their understanding of modern slavery and the risks within our business and supply chain.

Engage with industry peers and non-government organisation's to understand leading practice and explore potential future opportunities for collaboration. This will include surveying our people and suppliers to help inform our priorities and assess the effectiveness of the actions we have taken to date.

Continue our direct engagement with high priority suppliers, sharing knowledge and training, and build greater transparency of the supply chain beyond tier one.

Identify & assess risks

Undertake annual mapping and assessment of modern slavery risks.

Review the supplier risk assessment framework and due diligence approach, understanding that human rights risks may change over time as operations and operating contexts change and evolve

Take effective action

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

Include modern slavery requirements in standard on-boarding and contractual requirements across the supply chain.

Track & monitor

Understand how we better measure the effectiveness of our actions, including developing performance indicators.

Communicate & report

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

Remediate

Develop a remediation policy and framework, in the event of the identification of an adverse human rights impact.





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