

## SCOPE

Glad takes a zero tolerance approach to bribery and corruption and is committed to conducting our business with the highest standard of honesty and integrity.

Honesty and integrity are core values of Glad and the way it operates. Bribery and corruption are not compatible with these values and will not be tolerated.

The anti-bribery and corruption policy is applicable to all workers (including employees, contractors and volunteers) of Glad.

## OUR COMMITMENT

### We will:

- a. Comply with all applicable anti-bribery and corruption laws and this policy
- b. Act honestly and with integrity at all times
- c. Implement and maintain measures to prevent and detect bribery and corruption
- d. Be alert for instances of corruption and bribery and report any suspected or actual breach of this policy
- e. Ask questions and seek more information if unsure about obligations under this policy

### We will not:

- a. Engage in any acts that constitute bribery or corruption as defined in this policy
- b. Make a facilitation payment as described in this policy
- c. Permit or turn a blind eye to someone else engaging in corruption or bribery
- d. Authorise, provide, invite or accept any monetary or other benefit in order to obtain, retain or improve our business or for a business advantage
- e. Offer or accept gifts or hospitality if doing so may impair objective judgment, improperly influence a decision or create a sense of obligation
- f. Use company property or funds (directly or indirectly) for any unlawful, unethical or improper purpose
- g. Offer or give anything or value to a government official, or their representative to induce or reward improper conduct in the course of their duties or responsibilities
- h. Encourage someone else to do something that contravenes this policy.

## PROHIBITION AGAINST CORRUPTION AND BRIBERY

Glad workers must not do any act that constitutes bribery or corruption as defined in this policy. Glad workers must also not make a facilitation payment as described in this policy.

## PURPOSE

The purpose of the policy is to:

- (a) Set out the responsibilities of Glad Workers in observing and upholding the prohibition on bribery, corruption and related improper conduct; and
- (b) Provide information and guidance on how to recognise and deal with instances of bribery and corruption.

## WHAT IS BRIBERY AND CORRUPTION?

### Bribery

Bribery is the act of offering or accepting a benefit with the intention of influencing a person to behave outside of the responsibilities of their role or to not act in good faith, so that they may gain a personal or business advantage that is not legitimately due.

An act of bribery will typically have the intention to improperly influence the recipient to act dishonestly in the performance or discharge of their duty.

The benefit that is offered as part of the bribe may be monetary or non-monetary. It may include, non-cash gifts, political or charitable contributions, kickbacks, unwarranted allowances or expenses or lavish corporate hospitality.

Direct and indirect forms

Bribery may either be direct or indirect. It may involve arranging for an agent or intermediary to make an offer which will constitute a bribe to another person. It may also include where a bribe is made to an associate of a person who is sought to be influenced.

Corruption

Corruption is the misuse of office or power or influence for private or personal gain.

Facilitation payments

Facilitation payments are typically, but not always, minor unofficial payments made for the purposes of securing or expediting a routine government action by a government official or employee.

**RESPONSIBILITIES**

All of our workers commit to working in accordance with this policy and in addition all anti-corruption legislation pertaining to the jurisdiction in which they work. Key personnel (including senior managers, compliance managers, contract negotiators, business development managers and IT) will be required to complete bribery and corruption training annually or as directed by the Legal Team. Should you be unsure about your obligations under this policy or whether an act constitutes bribery or corruptions please contact the Legal Team for clarification.

**GIFT REGISTER**

This policy does not intend to prohibit reasonable and proportionate hospitality and promotional or other similar business expenditure intended for these purposes. All gifts and hospitality must be for a genuine purpose, reasonable and given in the ordinary course of business. Gifts and/or hospitality can never be given or received where there is an intention to influence or reward improper performance.

All employees of Glad who are in the receipt of a gift or hospitality that is valued more than \$250, must disclose the gift on the Company’s gift register and discuss the appropriateness of the gift or hospitality with their immediate Manager or Legal Team prior to receiving it.

**REPORTING VIOLATIONS AND SUSPECTED BREACHES**

All Glad workers have the responsibility to aid in the prevention, detection and reporting of behaviour in contravention of this Policy. Any employee who believes that a violation of this policy or any laws has been committed, is being committed or is being planned should report the matter immediately and may do so through the procedure set out in Glad’s Whistle blower Policy.

**PROTECTION**

Glad prohibits retaliation against anyone who reports on alleged suspicion or bribery. Employees who wish to raise a concern or report another’s wrongdoing, or who have refused the offer of a bribe, should not be worried about repercussions.

**CONSEQUENCES OF BREACHING THE POLICY**

Corruption and bribery are very serious offences and Glad takes any breach very seriously. Any breach of this policy by a worker of Glad may be regarded as serious misconduct, leading to disciplinary action which may include the termination of employment and/or referral of a matter to relevant authorities.

**MONITORING AND REVIEW**

The Legal team in conjunction with the Chief Financial Officer and Financial Controllers will conduct periodic reviews of the bribery risk faced by Glad.

This policy and relevant procedures will be updated and amended as required.

The Company’s General Counsel, will also monitor the effectiveness and implementation of the policy, and will consider the adequacy and effectiveness of the policy.

Our people are responsible for the success of this policy and are required to ensure that they use this policy to disclose any suspected wrongdoing or danger of this occurring.

This policy will be reviewed annually.



Nick Iloski  
**Managing Director**

**Glad Group**, comprising of:

**Glad Group Pty Ltd** | ABN 62 092 928 115

**Glad Cleaning Service Pty Ltd** | ABN 43 054 617 891

**Mutual Cleaning and Maintenance Pty Ltd** | ABN 53 006 516 810

**Glad Maintenance Pty Ltd** | ABN 85 127 522 481 | Contractor’s Licence: 215410C

**Glad Security Pty Ltd** | ABN 122 097 590 | Security Licences: NSW 409557154, ACT 17502081, QLD 3199590, VIC Licence 763-211-20S, WA SA40606

