

## SCOPE

This Code of Conduct and the accompanying Sustainable Procurement Policy applies to all suppliers, contractors and sub-contractors in the provision of goods and services across all areas of Glad Group's operations.

## PURPOSE

Glad Group acknowledges our responsibility to ensure that standards relating to people, the environment and the communities in which we operate are maintained and continuously improved through our supply chain. Glad Group believes that the actions of our suppliers are increasingly important factors in our sustainability performance. As such, the Glad Group seeks to conduct business with organisations who share our commitment to sustainability and who operate in an ethical, socially and environmentally responsible manner.

This Supplier Code of Conduct outlines Glad Group's fundamental expectations of its suppliers regarding the production and delivery of goods and services supplied. It supports Glad Group's values, purpose and strategy, and commitment to open and transparent relationships with our suppliers, as well as internationally recognized standards and appropriate codes of practice.

By accepting and abiding by this Code of Conduct, suppliers affirm that they are committed to working with Glad Group and meeting these requirements. It is the supplier's responsibility to achieve and maintain the minimum standards outlined in this Code of Conduct, and train employees and contracted parties on their consequential rights and responsibilities.

## SUPPORTING POLICIES

To assist us in driving ethical and sustainable supply chains, all suppliers contracting directly with Glad Group (and on behalf of third party contractors) must adhere to the following Glad Group policies;

- Sustainable Procurement Policy.
- Environmental Policy.
- Human Rights Commitment.

These policies can be found at [www.gladgroup.com.au](http://www.gladgroup.com.au).

## CODE OF CONDUCT PRINCIPLES AND REQUIREMENTS

The principles that we expect Glad Group suppliers to adhere to are detailed below:

### 1. Corporate governance, business conduct and management of own supply chain

*Glad Group regards good corporate governance and ethical practices as being of critical importance. Glad Group strives to ensure that it meets high standards of governance across its operations and its supply chain. Suppliers are expected to:*

- Conduct their business in accordance with the highest ethical standards.
- Adhere to acceptable business practices with their own suppliers, including providing timely payment within agreed terms.
- Minimise the impacts in their value chain, in particular environmental and human rights impacts, especially in relation to forced, bonded or involuntary labour, human trafficking and child labour.
- Have a zero tolerance approach to bribery and corruption and have processes in place to increase the likelihood of bribery and corruption issues being reported, including anonymously.
- Recognise and understand the nature and extent of the business' key impacts.
- Promptly report perceived, possible and/or actual conflicts or incompatibility between their official duties and their personal or private business.
- Refrain from offering excessive or inappropriate gifts either during a tender process or throughout the life of the relationship / contract.

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## 2. Human rights

*Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. Suppliers are expected to uphold these rights without exception.*

## 3. Legal & regulatory compliance

*Glad Group has policies and processes in place to comply with all laws and regulations relevant to their business. Suppliers are expected to comply with all applicable local, regional, national and global laws and regulations and all relevant industry, product and service standards.*

## 4. People

*Glad Group is committed to creating diverse, inclusive and safe workplaces, and providing equal opportunity in all aspects of employment, where people are treated with respect. Suppliers are expected to:*

- Respect human rights within its own operations by ensuring workplace health and safety standards are met through the implementation of appropriate policies, systems and processes.
- Maintain fair wages and working conditions, permitting freedom of association, and avoiding discrimination and bullying. Forms of forced and compulsory labour and child labour should not be used.
- Ensure that workplace diversity, inclusion, accessibility and flexibility is actively encouraged.
- Uphold and advocate for human rights by taking steps to identify and assess the existence of modern slavery in their operations and supply chains, and implementing policies and procedures that make it difficult for modern slavery to occur.
- Establish an effective grievance procedure to ensure that anyone working within their business or supply chain can submit a grievance without suffering any prejudice or retaliation of any kind, with access to fair remedies.
- Provide mandatory training for all employees to ensure they are appropriately skilled to provide services to Glad Group.
- Provide support systems to encourage general physical and mental well-being.
- Strive to support the principles in the UN Global Compact.

## 5. Environment

*Glad Group is committed to reducing its environmental impact through the minimization of its own carbon footprint, and aspires to utilize resources optimally for maximum lifecycle and disposal or recycling of waste without environmental harm. Suppliers are expected to:*

- Minimise the environmental impacts associated with their products and services, and from their operational footprint, including offices, manufacturing and processing facilities, and transport and distribution.
- Where relevant measure, monitor and manage impacts relating to greenhouse gas emissions, air quality, energy efficiency, water and wastewater, waste and hazardous materials, biodiversity impacts, lifecycle impacts of products and services, and packaging.
- Source and supply credible third party certified products.

All required environmental permits and registrations are to be obtained, maintained and kept current. Where appropriate, environmental certification of products and services should be sought.

## 6. Community engagement and development

*Glad Group aims to make a net positive contribution to our communities, people and environment. Suppliers are expected to:*

- Seek to build positive relationships and engagements with communities, which may include the provision of financial support and employment.

- Support Glad Group’s commitment to Reconciliation with First Nation’s Peoples, for example through the adoption of a Reconciliation Action Plan that best suits their business.

## 7. Social procurement

Social procurement leverages an organisation’s buying power to deliver social value, above and beyond the value of the goods or services being procured. It builds diversity into the supply chain and creates job opportunities for under-represented groups, reinvigorating marginalised communities.

Glad Group is committed to applying a positive incentive as part of the procurement selection process for suppliers that have a focus on vulnerable groups and diversity in their workforce. For example, this might include employment opportunities for the long term unemployed, young people, people with a disability, or migrant workers.

*Suppliers are expected to support Glad Group’s commitment to social procurement in a way that best suits their business.*

## 8. Cyber security and privacy

*Glad Group recognise the necessity to adapt to the rapidly changing cyber environment and maintain an information security system and relevant protocols that are no less rigorous than accepted industry standards to protect any Personal Information and Confidential Information obtained in the course of acquiring services, from unauthorized access, disclosure or misuse. Suppliers are expected to:*

- Maintain appropriate information security systems and relevant protocols.
- Immediately notify Glad Group on becoming aware of a Security Incident
- Ensure all agreements and other supply chain arrangements the supplier enters into and which may allow or cause access to Glad Group data are appropriately governed and protected.
- Immediately notify Glad Group (including providing full details) of a Privacy Incident.

## 9. Subcontracting

Any supplier directly engaged by Glad Group is known as a “Tier-1” supplier. Where a Glad Group supplier then subcontracts work out we refer to that entity as a “Tier-2” sub-contractor. Glad Group does not accept any sub-contracting of services where we have not provided our express written consent to do so. The use of non-approved sub-contractors is a material breach of this Code of Conduct, and Glad Group may seek to exercise any right we hold to deal with such breaches.

## 10. Reporting of information

Suppliers will make available upon request any compliance, governance or sustainability performance information, data or reports which may be required by Glad Group. These may include copies of certificates, accreditations and other product information.

## 11. Reporting concerns

The standards of conduct described in these guidelines are critical to the ongoing success of Glad Group. If you have any concerns about compliance or ethics issues while working for or with Glad Group or want to report illegal or unethical activities:

Email: [whistleblower@gladgroup.com.au](mailto:whistleblower@gladgroup.com.au)

Post: Marked “Strictly Private and Confidential” Glad Whistleblower

All matters raised in good faith through these reporting lines will be handled in a confidential and non-retaliatory basis.

## REVIEW OF THIS POLICY

We will review this policy periodically and may modify and update it at any time. Changes to this policy will come into effect immediately upon such changes being uploaded on our website, so we encourage you to check this policy from time to time.



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

