

**GLAD GROUP**

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**UNITED NATIONS GLOBAL  
COMPACT: ANNUAL  
COMMUNICATION ON PROGRESS**

1 October 2021 to 30 September 2022

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## STATEMENT OF CONTIUNED SUPPORT

1 October 2022

To our stakeholders,

I am proud to present Glad Group's second Communication of Progress and confirm that our business remains committed in its support of the Ten Principles of the United National Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

The Ten Principles are fundamentally aligned to our human values, and our approach to operating our business in a sustainable, ethical and inclusive way.

We support public accountability and transparency and in this annual Communication of Progress we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and processes and procedures. We also commit to sharing this information with our stakeholders using our many channels of communication and engaging our business partners in discussion of these important topics.

In addition to this Communication of Progress, Glad Group has made a Statement of its commitment to the United Nations Global Compact to our stakeholders on our [website](#).

We remain committed to further enhancing our responsible business activities and our industry's contribution to sustainable development more broadly.

Yours sincerely



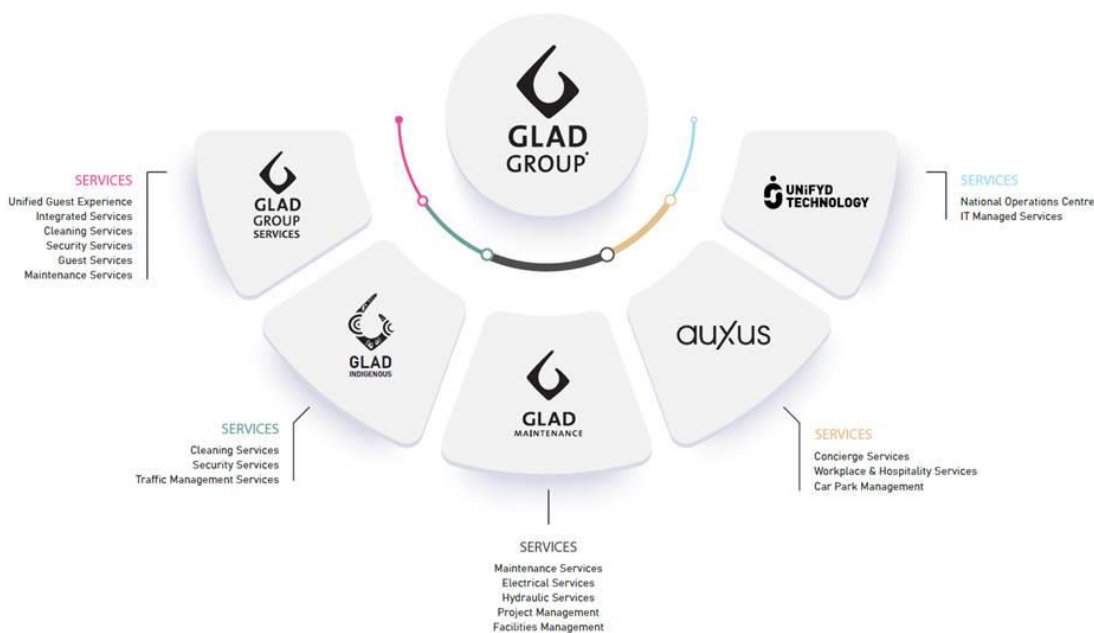
Nick Iloski

Executive Chairman

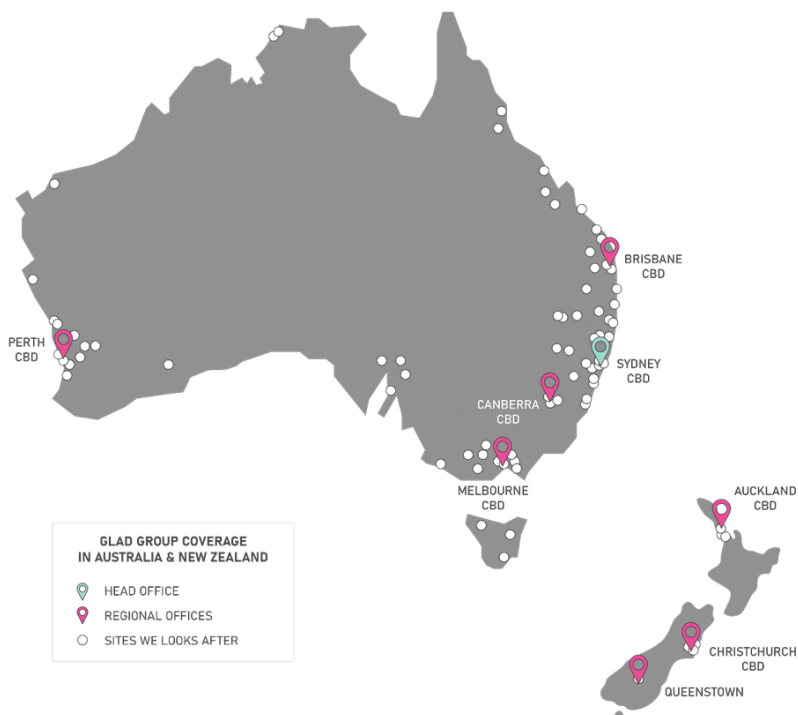
Glad Group of companies

## ABOUT GLAD GROUP

Glad Group has been providing security, cleaning, maintenance, and concierge property services to the commercial, retail, governmental and educational sectors since 1989. The organisation now encompasses seven entities that differ in their services and objectives and are tailored to our customer's requirements, with the opportunity to have one truly integrated services solution.



### About Glad Group Services



**Glad Group in numbers:**

**2,550+**  
Employees across Australia and New Zealand

**60+**  
Nationalities within our workforce

**350+**  
Buildings we clean, secure and maintain

**33**  
Years operating in the industry



## HUMAN RIGHTS

**Principle 1:** Businesses should support and respect the protection of internationally proclaimed human rights; and

**Principle 2:** make sure that they are not complicit in human rights abuses.

### Policy and goals

*It is our goal to have a work environment and supply chain that is free of harassment and victimisation, where everyone is paid fairly, and people feel safe and respected.*

Human rights underpin everything that we do at Glad Group. Our core human values of Trust, Respect and Integrity articulate how we engage with our stakeholders and how we approach the relationships that we have with our people, our business partners, our suppliers and the broader community. In turn, these human values inform the expectations that we have of our business partners and suppliers, and about how they conduct and manage relationships with their stakeholders.

Glad Group has publicly available policies in place that detail our expectations of our stakeholders. This includes:

- Code of Conduct
- Supplier Code of Conduct
- Human Rights Commitment
- Diversity Policy
- EEO and Anti-discrimination policy
- Whistle-blower policy
- WHS policy
- Sustainable Procurement policy
- Social Sustainability and Community Engagement policy

Oversight of the development and implementation of these policies sits with Glad Group's Governance Committee and Sustainability Committee, which meet regularly.

Our commitment to uphold human rights and take action is also embedded within our Sustainability Strategy, "A Force For Good", through our focus on corporate governance and responsible business practices, as well as our safety and wellbeing, and inclusion and diversity focus areas.

### Implementation

It is every employee and suppliers' responsibility to understand and meet the requirements of either working at, or working with, Glad Group. They are also held responsible for reporting incidents of non-compliance.

We support understanding and implementation of these policies through training for our employees. We also believe it is important to build understand and capability within the supply chain and remain a committed partner of the Supply Chain Sustainability School, a not-for-profit initiative that aims to create a more sustainable supply chain for the property, construction, and infrastructure industries in Australia. We do this by providing free learning resources across a range of sustainability topic areas to support upskilling in the built environment sector.



Challenging how we do things and driving continuous improvement is critical. We continue to build our capabilities and knowledge by actively participating in relevant human rights focused collaborative initiatives. This enhances transparency and understanding of the potential for high rights abuses and informs our program of work to manage and mitigate this risk.

The cleaning and security industries are regularly identified as having a high potential for human rights abuses due to the diverse nature of the workforce it attracts. Consequently, we remain focused on ensuring that:

- Human rights risks are identified and managed as part of our broader Risk Management Framework.
- Our People and Culture policies accurately articulate our commitment to fair and equal treatment and are consistently applied across our organisation
- We are transitioning to a predominantly direct employment model for specialist services, limiting our need for subcontracted labour where we have identified greater risk of human rights issues.
- We continue to promote our Whistle-blower approach to our stakeholders, to reinforce that there is an independent and confidential channel through which concerns can be raised without fear of reprisal, if they don't feel comfortable talking to their direct manager.
- We ensure that the relevant fair work awards and any industry instruments are appropriately administered by employing a dedicated and experienced payroll team.
- All employees receive awareness training around human rights violations, with more detailed training provided for our people managers.
- We continue to participate in customer-led auditing (including the [Cleaning Accountability Framework](#) for two sites at which Glad Group provides services) and have commissioned specific audits of our business.

Building a greater understanding of our supply chain is a priority and we have completed our annual detailed tier 1 supply chain mapping, risk and spend analysis to ensure we are focusing our attention and resources on the areas of our supply chain that require further understanding and due diligence. This due diligence process has also been enhanced with human rights risk factors explicitly included in our self-assessment questionnaire that is shared with all potential suppliers to the company, as well as a requirement for completion by our highest risk-rated suppliers (approximately 35 suppliers that account for more than 80% of Glad Group's spend). Responses to this determine next steps in terms of validation, further information requirements and level of active supplier management required.

#### Measurable results and outcomes

No incidents of human rights violations have come to Glad Group's attention during the period.

The requirement for our highest risk-rated suppliers to complete a Group's self-assessment questionnaire has seen a supplier self-select out of providing services to Glad Group due to an unwillingness to disclose information about their business practices.

#### Further information

Please refer to our website: [Glad Group Systems | Glad Group](#)



## LABOUR

**Principle 3:** Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

**Principle 4:** the elimination of all forms of forced and compulsory labour;

**Principle 5:** the effective abolition of child labour; and

**Principle 6:** the elimination of discrimination in respect of employment and occupation.

### Policy and goals

*We will ensure that there is no forced, compulsory or child labour within our own operations and that all employees are free to make their own choices and work in an environment free from discrimination. It is our expectation that these goals extend to and are respected by our business partners and suppliers within their own businesses.*

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.

As with human rights, Glad Group has policies in place that articulate our expectations of our stakeholders:

- Code of Conduct
- Supplier Code of Conduct
- Human Rights Commitment
- Diversity Policy
- EEO and Anti-discrimination policy
- Whistle-blower policy

Oversight of the development and implementation of these policies sits with Glad Group's Governance Committee and Sustainability Committee.

Our commitment to uphold ethical and sustainable labour practices and take action is also embedded within our Sustainability Strategy, 'A Force For Good', through our focus on corporate governance and responsible business practices, as well as our safety and wellbeing, and inclusion and diversity focus areas.

### Implementation

We know that diversity of background brings broad perspectives that lead to better decision-making. We work hard to ensure that our people feel able to bring their whole selves to work each day, supported by our Diversity and Inclusion approach.

In addition to the actions outlined within our approach to human rights, we have undertaken a number of other actions to ensure everyone within the workforce sees diversity as a competitive advantage. We have adopted the following practices:

- Risks to our ability to deliver an equal, diverse and inclusive workplace are identified and managed through our Risk Management Framework.
- We promote, measure, monitor and report diversity statistics of our workforce and recruitment practices.
- We ensure employees are trained and understand what discrimination is in both direct and indirect situations.



- Our core program of Culture of Accountability educates employees on how to deliver exceptional results whilst working collaboratively and leveraging diversity
- 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.
- Our hiring practices and induction processes support applications for candidates of all backgrounds but is specific in the information that must be provided by potential employees. For example, this process requires any new starter to provide details of their date of birth, and this information must be able to be verified with identification that confirms a new employee's working rights within Australia.
- Health and safety is a priority for Glad Group, with our Workplace Health and Safety system certified annual to ISO 45001. However, this reach extends not only to the physical safety of our employees but also their mental health. To demonstrate this commitment, we have an Employee Assistance Program (EAP). We have partnered with a leading mental health and wellbeing provider, Assure Programs, to benefit all our employees. Our EAP offers our employees confidential counselling sessions with qualified psychologists, ensuring they receive the best care to help improve their health and wellbeing. It also provides resources and training for our managers to recognise the signs of stress and wellbeing of their staff and the tools they need to support them. As a company, it is our ambition that all members of the Glad Group work well and have the resources to resolve any personal or workplace challenges.

We understand that there are still barriers to some members of the community to working in parts of our business. For example, the security industry generally employs rotating rosters which means that employees can see themselves working on nightshifts or over weekends. This can be challenging for (for example) primary care givers or those with religious beliefs that preclude them from working on certain days of the week. We do not believe that this should stop anyone joining the security industry and in working closely with our customers to address and remove these barriers have had success in placing candidates who might otherwise not have had the opportunity.

In line with the business's commitment to diversity, inclusion and equal opportunity, Glad Group has been a long-standing supporter of First Nations Peoples and communities in Australia. In May 2022, Glad Group reconfirmed this commitment and developed its second innovate [Reconciliation Action Plan](#) which publicly holds us accountable for taking tangible action to support the reconciliation movement in Australia.

Glad Group also aspires to embed the principles articulated by the Cleaning Accountability Framework (CAF). The Cleaning Accountability Framework is an organisation whose mission is to improve labour practices in the cleaning industry. CAF works with cleaners, tenants, contractors, property owners, facility managers, and investors across the cleaning supply chain to ensure ethical labour practices through our promotion of decent work conditions and sustainable procurement. Through the enhancement of our supplier due diligence processes we are also working to ensure that these principles are upheld in our supply chain.

#### Measurable results and outcomes

No incidents of forced or child labour have come to Glad Group's attention during the period.

#### Further information

Please refer to our website: [Glad Group Systems | Glad Group](#)





## ENVIRONMENT

**Principle 7:** Businesses should support a precautionary approach to environmental challenges;

**Principle 8:** undertake initiatives to promote greater environmental responsibility; and

**Principle 9:** encourage the development and diffusion of environmentally friendly technologies.

### Policy and goals

*We are committed to achieving carbon neutrality by 2025, and minimising negative environmental impacts across all business operations.*

We understand that the way that we conduct our services will impact on the environment of the asset that we are providing the service to, and that our actions can have an impact on the health and well-being of the occupants and visitors. Whilst the direct environmental footprint of our operations is relatively small compared to that of our customers, Glad Group remains focused on reducing our environmental impact and considering the complete range of potential direct and indirect costs to the environment. We have identified the material contributors to our footprint in line with a Climate Active aligned environmental footprint and are setting targets and implementing consumption reduction activities.

As with the previous UNGC principles, Glad Group has policies in place that articulate our expectations of our stakeholders:

- Code of Conduct
- Supplier Code of Conduct
- Environmental policy
- Green Cleaning policy
- Sustainable Procurement policy

Oversight of the development and implementation of these policies sits with Glad Group's Governance Committee and Sustainability Committee.

Our commitment to minimise our impact on the environment is also embedded within our Sustainability Strategy, "A Force For Good", through our focus on green solutions, emissions reductions and waste management.

In addition, Glad Group's accredited Integrated Business Management System (IBMS) underpins all aspects of the 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, and sees us compliant with Environmental Management Systems ISO 14001:2015.

### Implementation

Environmental sustainability is integrated into the way we manage our business at many levels. Our ISO-compliant environmental management system establishes the framework for how environmental risks are identified and managed, with clear roles and responsibilities articulated, and an annual audit completed. For example;

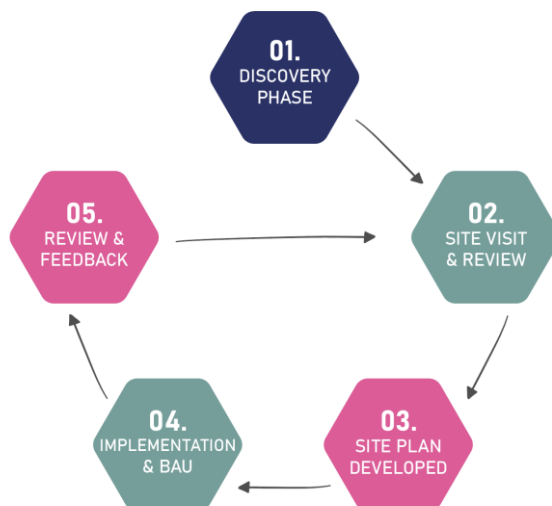
- Glad Group is committed to Australia's collective effort to measure, reduce and offset carbon emissions to lessen our negative impact on the environment. We are already experiencing more weather extremes, which result in broader economic and social impacts. In line with this commitment Glad Group has conducted a comprehensive assessment of Greenhouse Gas (GHG) emissions accountable to the Australian operations of Glad Group for the financial year 20/21.

Summary of GHG emissions for the FY 2020/21		
Operational Boundary	Associated Inventory/Service	(tCO <sub>2</sub> -e/yr)
Scope 1	Transport Fuels, Refrigerants	285.7
Scope 2	Purchased Electricity	145.7
Scope 3	Equipment, Employee Commute, Working From Home, Flights, Third Party Services, Off-site Waste Disposal, Transmission & Distribution losses, Fuel Extraction, Production & Distribution losses, Other Utilities, Base Building Services	3,221.7
<b>Scope 1, 2 &amp; 3 (Full Scope)</b>		<b>3,653.1</b>
<b>Scope 1 &amp; 2 (S1&amp;2)</b>		<b>431.5</b>

Using this as a base line of performance, Glad Group has begun to put in place actions to reduce our impact. For example, at our head office we have a 100Kw Solar Array on the roof that has seen out consumption of electricity reduce significantly.

- At a provision of service level, we are committed to using environmentally sound products (specifically GECA certificated products) and have begun to roll these out across our customer portfolio. We are adopting the most sustainably powered equipment that is also water efficient. In our cleaning division, this also includes implementing best practice cleaning schedules that specify the extent and frequency of cleaning. Whether on site at a shopping centre or commercial building, or from a corporate perspective, equipment is also used to its full capacity so that we do not generate e-waste unnecessarily.
- Importantly, our focus on environmental impact extends to our suppliers. As part of the self-assessment questionnaire sent to our highest risk-rated suppliers, they are required to answer questions on whether they have identified the environmental impacts of their business and how they are minimizing their negative impact. We have established clear guidelines for purchasing preferences. For example, we are focused on ensuring that purchased products reflect a better choice environmentally, with a meaningful reduction in a range of environmental impacts during it manufacturing, transport, use and disposal. This includes consideration of how a product is packaged, in line with the Australian Packaging Covenant, and what happens to the product at the end of life. As an organisation we are also committed to using products for their full life – that is choosing products that have a longer life and can be used multiple times. This extends to products such as the microfiber clothes that we use for cleaning, which are washed regularly to avoid bacterial and viral build up and hence kept out of the waste stream for longer.
- We acknowledge the finite nature of resources and the limited opportunities to dispose of waste. As such, we seek opportunities to implement and transition to a more circular economy, closing material loops by recognising that waste has value and can be designed for reuse and regeneration. This approach extends to how we work with our customers and support them in their management of waste, as well as in our own operations. We know that to make meaning change in reduction of waste isn't just about

updating a process or practices but requires the engagement of hearts and minds to fundamentally change behaviour.



- Training is critical and is provided to all employees on broader environmental policies and approaches. The management of environment risks is particularly relevant for our cleaning division, and they receive specific and regular training on such areas as spills and accident management, chemical measuring and dilution and the appropriate disposal of wastewater.

#### Measurable results and outcomes

Glad Group has taken significant steps towards truly understanding the environmental impacts of our business and actively managing these impacts. We are currently developing our FY22 carbon footprint to review and track our progress against targets.

#### Further information

Please refer to our website: [Glad Group Systems | Glad Group](#)



## ANTI-CORRUPTION

**Principle 10:** Businesses should work against corruption in all its forms, including extortion and bribery.

### Policy and goals

*We take a zero-tolerance approach to bribery, fraud and corruption and expect all employees to act with the highest standards of honesty and integrity, aligned to our company values*

Glad Group is committed to working against all forms of corruption including extortion and bribery. We recognise that these issues are often connected with human rights issues as well. We expect all our people to do the right thing and comply with applicable laws, codes and policies. We are committed to creating and maintaining a culture of corporate compliance and ethical behaviour in which employees are responsible and accountable for their actions, and are able to raise concerns regarding unethical, unlawful or undesirable conduct, without fear of reprisal and in confidence.

As such Glad Group takes an integrated approach to compliance and environmental, social and governance priorities, encouraging and facilitating collaboration and knowledge sharing between teams to develop the best approaches and frameworks for implementation.

We also understand that managing these kinds of risks is about managing human behaviour, not just within our own business but also understanding potential risks within the operations of our business partners. Culture and conduct are critical to the successful implementation of anti-bribery and corruption policies, and a good policy simply isn't enough on its own. The level of knowledge and understand that we are expected to have means that we are adopting integrated approaches to gathering this information and conducting due diligence on these types of issues.

Glad Group has policies in place that articulate our expectations of our stakeholders:

- Code of Conduct
- Supplier Code of Conduct
- Conflict of Interest policy
- Whistle-blower policy
- Anti-bribery, Fraud and Corruption policy
- Delegation of Authority / Limits of Authority policy

### Implementation

Glad Group has put in place actions to ensure we comply with all applicable anti-bribery, fraud and corruption laws, and company policies. We will:

- Act honestly and with integrity at all times.
- Implement and maintain measures to prevent and detect bribery, fraud and corruption.
- Be alert for instances of bribery, fraud and corruption and report any suspected or actual breach of policy.

We do this by:

- Assessing the risk as part of our broader Risk Management Framework.



- Putting Glad Group's values front and centre and building an ethical and responsible culture where people are comfortable to speak up.
- Incentivising our employees to drive the right behaviours and actions.
- Providing mandatory training for our employees to ensure they understand what is expected of them.
- Putting in place internal controls, such as limits of authority and segregation of duties.
- Providing mechanisms for people to speak up, either to their manager or our independent Whistle-blower line.
- Undertaking due diligence on a broad range of topics, including anti-corruption, for our business partners.
- Holding our suppliers accountable for their behaviours and alignment to our Supplier Code of Conduct.

#### Measurable results and outcomes

There were no known incidents of corruption or bribery raised or identified by Glad Group during the period.

#### Further information

Please refer to our website: [Glad Group Systems | Glad Group](#)



**GLAD  
GROUP**