

# Our commitment to ESG

Full year 2023  
sustainability review





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This report offers a comprehensive overview of GCW Group’s environmental, social and governance achievements from 1 January to 31 December 2023. Our approach to sustainability reporting focuses on identifying and effectively communicating material issues affecting our organisation and its stakeholders. We aim for clarity, transparency, timeliness, and relevance in our reporting. This document covers disclosures related to GCW Holdings Pty Limited and its subsidiaries, including the Grace group of businesses.

## Grace Group



# Statement from the GCW Board of Directors

**grace:**

At GCW, we are dedicated to minimising our impact on the communities we serve, ensuring the efficient and dependable delivery of project logistics, relocation, and information management services. We place a strong emphasis on environmental sustainability, social responsibility, and stringent governance.

Our long-term success hinges on our commitment to sustainable operations, adaptability to evolving conditions, and collaborative partnerships across the supply chain to enhance our focus on Environmental, Social, and Governance (ESG) principles. We acknowledge that the logistics sector is a significant contributor to emissions and recognise the urgent responsibility we bear to address environmental challenges and reduce our impact on the planet. We believe that addressing this global issue demands a comprehensive suite of strategies. Every step we take lays the groundwork for the more profound changes necessary to revolutionise our industry.

Over the past year, we've conducted an extensive review of our total carbon emissions to accurately measure the environmental impact of our operations and establish baseline emissions intensity ratios for our businesses. Our aim is to launch a range of programmes and initiatives designed to decrease our carbon footprint, reduce energy use, and foster sustainable practices across our supply chain.

We believe that a sustainable business must prioritise the wellbeing and development of its employees, partners, and clients. Adopting a safety-first approach, treating everyone with dignity, recognising the individual contributions of our team, and attentively listening to the needs of our customers are essential to a successful workplace culture.

GCW is committed to cultivating a positive and inclusive work environment through comprehensive employee engagement initiatives, diversity and inclusion efforts, and partnerships with community organisations. Our objective is to not only enhance our workplace but also to make a significant, positive impact on society.

In 2023, our businesses provided financial or in-kind support to a diverse range of charitable and not for profit community organisations, including The Indigenous Literacy Foundation, Greenfleet, The Torch, The Salvation Army, Vinnies and HeartKids.

As guardians of several iconic Australian brands, we understand the significance of guiding our team on a journey towards reconciliation, culminating in the creation of the GCW Group Reconciliation Action Plan (RAP). This plan signifies our dedication to engaging with and uplifting First Nations peoples and communities. It underlines our goal to become a preferred employer for First Nations individuals, reflecting our commitment to meaningful collaboration and empowerment.

The subsequent sections of this review offer a detailed examination of our collective accomplishments as we progress on our journey towards Environmental, Social, and Governance (ESG) goals. We are optimistic about maintaining and enhancing this momentum in the year ahead.



**Craig Page**  
Group Managing Director



**Warren Elsworth**  
Director – Finance & Support  
Services



**Michael Dunstone**  
Director – Information Management



“ We are dedicated to minimising our impact on the communities we serve, ensuring the efficient and dependable delivery of project logistics, relocation, and information management services. ”

*GCW Board of Directors*



**grace:**

# Overview of the Group's business

**grace:**

Our Group operates as an ecosystem of businesses dedicated to service, underpinned by a commitment to trust, excellence, and responsibility. We strive to transform the future of asset management and integrated logistics, prioritising the needs and aspirations of our employees, customers, and shareholders.

Our businesses are long-established market leaders in their sectors and include iconic brands such as Grace Removals, Grace Information Management and Crown World Mobility. We have a proud heritage of success, quality and innovation. Our commitment to continuous improvement is at the heart of our culture, and we are constantly looking for ways to exceed customer expectations.

From product development through to customer service initiatives, our focus has always been on providing the best possible solutions to meet our customers' needs. As an organisation dedicated to excellence, we strive for operational efficiency, while placing a strong emphasis on sustainability. We believe in doing business responsibly, actively reducing our environmental impact, engaging with Indigenous support groups, and forging strategic alliances to support Australians in need.

Our commitment to consistent quality, value for money and exceptional customer service has placed our businesses at the forefront of our sectors.

## Purpose

Shape the future of asset management and integrated logistics.

## Vision

We envisage a world of uninterrupted and absolute safety of assets for individuals and businesses alike.

## Mission

Unify unrivalled trust, excellence and responsibility to build Australia's leading services group.

## Values

### Unity

We find solutions that unite us rather than solutions that divide us. We celebrate our diversity of talent and skills. Together we grow.

### Excellence

We constantly strive to be better than we were yesterday. We seek ways to learn, improve, innovate, and disrupt the status quo.

### Integrity

We do what is right, even when it is difficult or inconvenient. We can be relied upon in our words and our actions.

### Impact

We prioritise meaningful outcomes. We positively influence and create value inside and outside of our organisation.

### Commitment

We foster environments for individuals and teams to take ownership, excel, and make meaningful contributions. We realise potential.



# Overview of the Group's business

**grace:**

**1,143**  
employees

more than  
**100,000**  
clients



**13**  
million cartons  
in storage

**50**  
sites

more than  
**70,000**  
moves

more than  
**250,000**  
sqm warehouse  
space

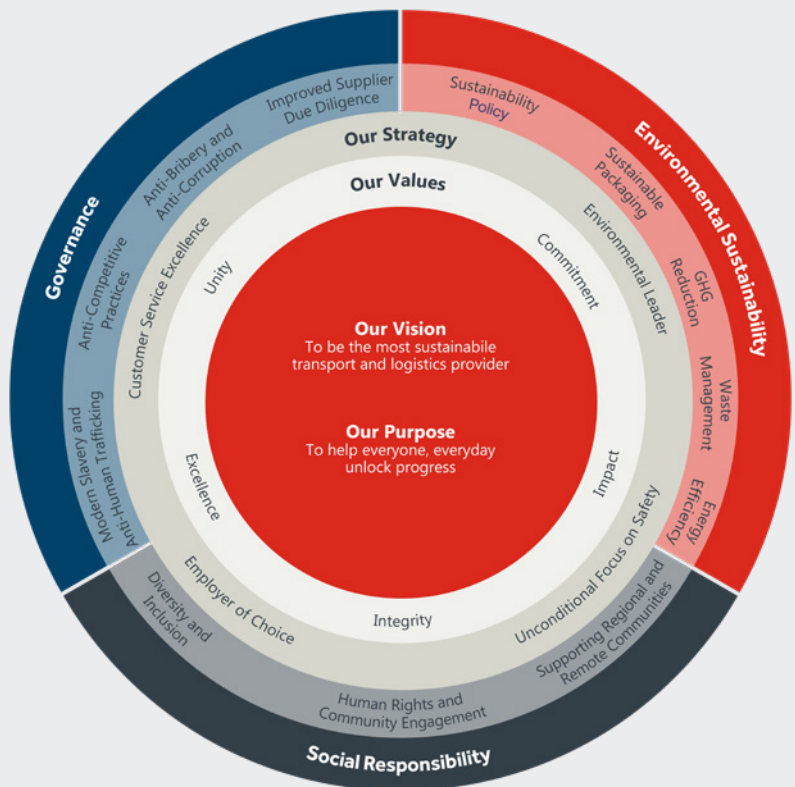


## Driving sustainable information management, mobility services and project logistics

At GCW Holdings, we recognise that our enduring success hinges on our dedication to sustainability. As part of this focus, we are leading our industry sectors in developing innovative solutions to reduce the environmental impact of our business activities by adopting cutting-edge technologies and practices that diminish our carbon footprint and enhance resource efficiency.

We understand the critical role diversity plays within our workforce. We are committed to fostering inclusivity, championing gender equality, and launching initiatives to support Indigenous communities. Furthermore, our unwavering commitment to safety guarantees the wellbeing of our employees, customers, and the communities we serve throughout Australia.

We take pride in supporting regional and remote communities by investing in infrastructure and providing employment opportunities in these areas. Through these initiatives, we aim to secure a sustainable future for our business and for the communities we serve.



### Environment

- Sustainability Policy
- Sustainable packaging, uniforms, products
- GHG reduction
- Embrace circular economy principles



### Social

- Health, safety and wellbeing
- Diversity and inclusion
- Indigenous participation
- Community engagement
- Supporting regional and remote communities



### Governance

- Modern slavery and anti-human trafficking
- Anti-competitive practices
- Anti-bribery and corruption
- Supply chain management and improved supplier due diligence



# 2023 ESG highlights



## Environmental Sustainability

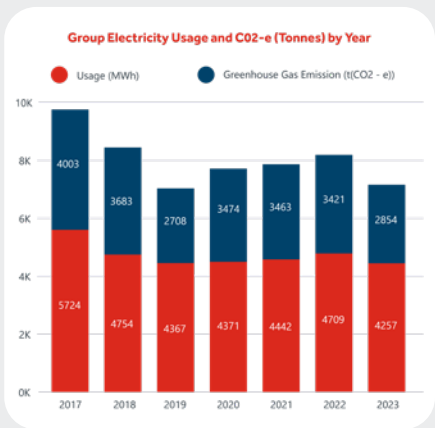


Australia's first electric removals truck.

Full scope GHG Audit.

Greenfleet reforestation emissions offsets.

Reduction on purchased electricity usage by 40% since 2017.



## Social Responsibility

### Health & Safety:

- Zero fatalities
- Increase usage of our Injury Prevention Program by 16.5%
- Reduction in Lost Time Injury Claim Payments by 22.6%
- 60% rise in the reporting of Near Misses indicates proactive management of hazards, risks, and issues—leading to a stronger safety culture and a safer workplace environment.

Renewed partnership with Indigenous Literacy Foundation and HeartKids.

New circular economy donations partnership with Salvos Stores.

Increase in female participation in executive roles in 2023.



## Governance

Information Security Committee – making better strategic decisions for Information Security. This will include a Risk Committee in 2024 as part of the Enterprise Risk Management plan for 2024.



Achieving best practice through internal and external certification for continual improvement. ISO suites, PCI:DSS, SOC II, FAIM accreditation.

Modern Slavery Working Group and Roadmap development.

# 22.6%

reduction in lost time  
injury claim payments



**grace:**



# What we are doing

**grace:**

## Environmental – waste reduction

We are committed to introducing advanced waste management practices across our branches. By 2025, we aim to implement co-mingled waste recycling in all branches located in capital cities. This initiative is expected to significantly reduce our Scope 3 emissions related to waste.

## Environmental - energy emissions reduction

Incorporation of Green Building Standards in all new facility constructions and refits.



## Health, safety and wellbeing – introducing lost time measurement

Introducing the Lost Time Incident Frequency Rate as a strategic measure to monitor and manage Lost Days, aiming to significantly decrease the occurrence of Lost Time injuries.

## Governance - improving supply chain productivity

Enhance supplier compliance by implementing a prequalification supplier due diligence system. This system will oversee compliance requirements across the supply chain for ESG systems and data, safety, cybersecurity, information management, modern slavery, and ethics.

## Governance - enterprise risk management solution

Introducing a comprehensive online Enterprise Risk Management solution that addresses key areas including modern slavery, supply chain issues, financial risks, reputation management, cybersecurity, information and data security, and ESG.

## Governance - standard controls register

To enhance our information and data security, we're establishing a unified registry that aligns with our audited accreditation standards. This includes ISO 27001, Essential Eight, PCI DSS, SOC 2, and GDPR, ensuring we implement robust risk mitigation strategies and controls.

## Health, safety and wellbeing

Launching a Hazard Reduction Campaign to educate our staff on the critical importance of identifying and being aware of hazards. This initiative aims to empower them to make more informed safety decisions, ensuring they return home safely.

## Gender, diversity and inclusion

The female workforce has risen to 38%, with women now comprising 27% of team members. This progress has narrowed the median total remuneration gender pay gap to 3.5% compared to the national average of 19%.



## Whistleblower policy

To reinforce a workplace culture that encourages transparency and accountability, we have introduced an independent Whistleblower Reporting Service. This service allows both employees and external stakeholders to confidentially and anonymously report any misconduct, without the fear of retaliation or adverse consequences.

# -1.2%

median base salary  
gender pay gap



**grace:**



# Environmental sustainability

**grace:**

GCW Holdings is proactively expanding its vehicle fleet with an emphasis on fuel efficiency, experimenting with electric trucks and vans, embedding energy-efficient features into both new and existing facilities, innovating in sustainable packaging, and forging partnerships that advance the principles of the circular economy.

## Areas of focus

- Setting annual GHG intensity metric reduction targets
- Reducing Scope 1 and 2 emissions across our fleet and facilities
- Waste minimisation, recycling and behavioural awareness training
- Emissions reporting
- Greenfleet reforestation offsets

We are dedicated to aligning our processes and practices with the industry-leading ISO14001 Environmental Management System Standards. This commitment involves investing in a modern low emissions fleet across our network, including the adoption of electric vehicles and shifting a larger proportion of our linehaul road services to more efficient and lower-emission rail services. Furthermore, we are actively engaging with both our corporate and consumer customers to reduce waste sent to landfill, increase recycling rates, and promote activities that support the circular economy, such as asset recycling and repurposing.

In line with our commitment to sustainable infrastructure, we are adhering to Green Building Standards and investing in energy-efficient designs for new GCW Group facilities, ensuring our operations not only meet but exceed current environmental expectations.



# Carbon emissions

In preparation for Australia’s proposed legislative Mandatory Climate Reporting requirements for Group 2 corporations, GCW has engaged an external carbon emissions auditor (Pangolin Associates) to calculate and report on the Group’s Full Scope carbon emissions for the calendar year (CY) 2022. Based on best available data, the estimated total carbon emissions for GCW was 56,963.3 tonnes of carbon dioxide equivalents (tCO<sub>2</sub>-e). This total includes indirect contributions along the supply chain (scope 3 emissions), which accounted for 82.4% of total emissions.

Scope1

Direct emissions are those over which a company has direct control via ownership of activities.

(tco2-e): 6,916.60

Scope2

Purchased electricity.

(tco2-e): 3,097.50

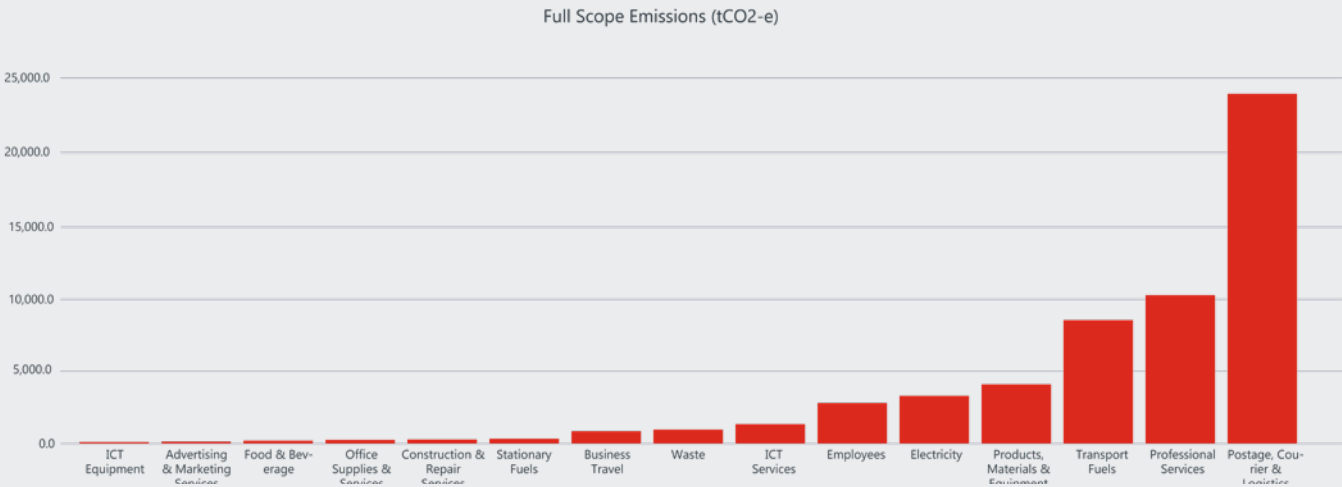
Scope3

Indirect emissions from activities or services purchased from other third-party companies and include indirect emissions associated with scope 1 and 2 sources.

(tco2-e): 46,949.20

|   |  |                        |
|---|--|------------------------|
| Scope 1, 2 and 3 (Full Scope):<br>56,963 Tonnes CO <sub>2</sub> | Scope 1 and 2 (S1&2):<br>10,014 Tonnes CO <sub>2</sub> | Energy (TJ):<br>115.80 |
|---|--|------------------------|

Figure I: GHG emissions for GCW by emissions category

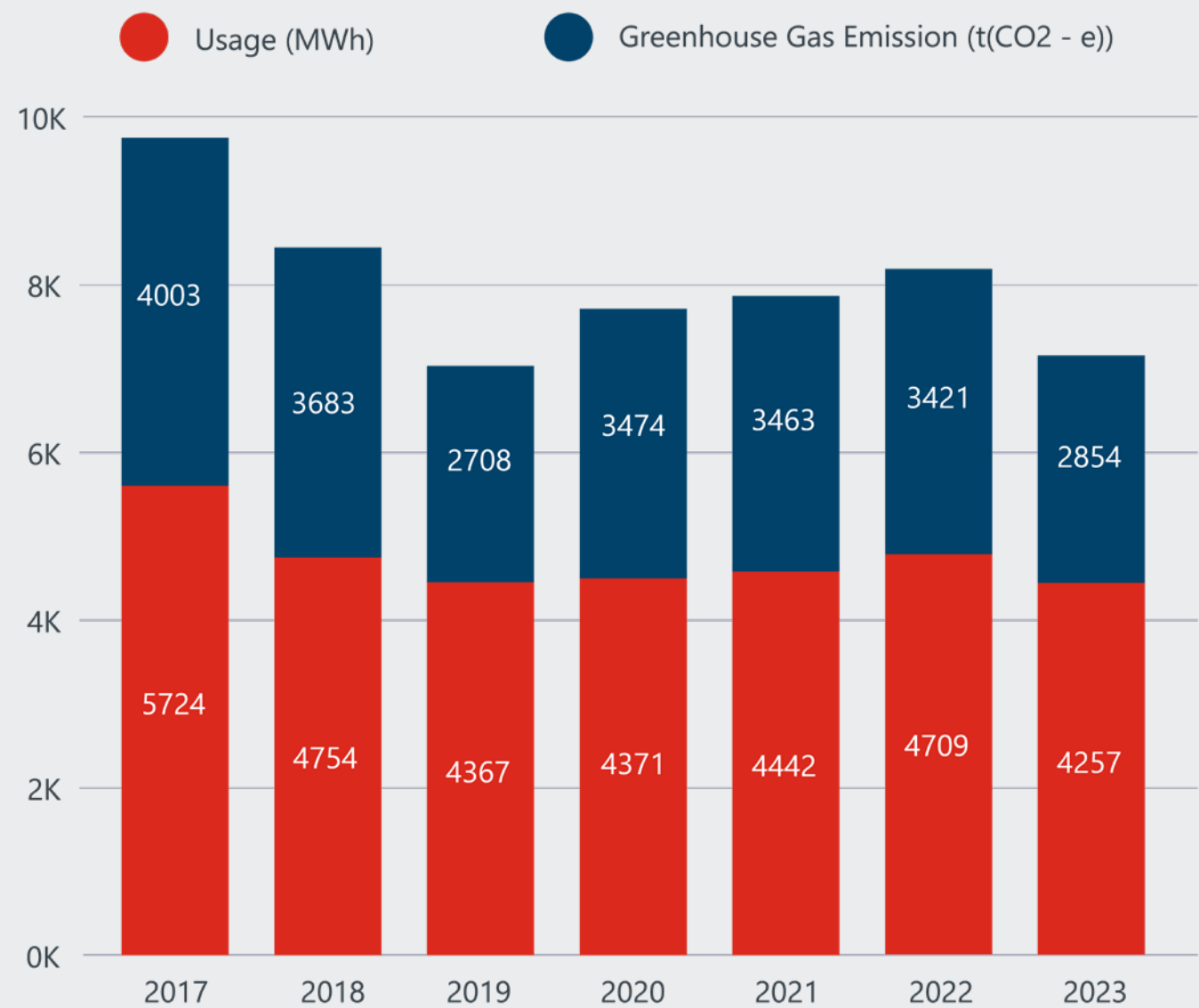




# Electricity consumption

The progressive roll-out of commercial solar systems across all GCW owned sites and the implementation of low-consumption LED lighting has resulted in a 26% reduction in purchased electricity usage since 2017. As the Group continues to invest in new facilities, the incorporation of Green Building Standards will result in further energy efficiency savings.

Group Electricity Usage and C02-e (Tonnes) by Year



# Waste minimisation and recycling

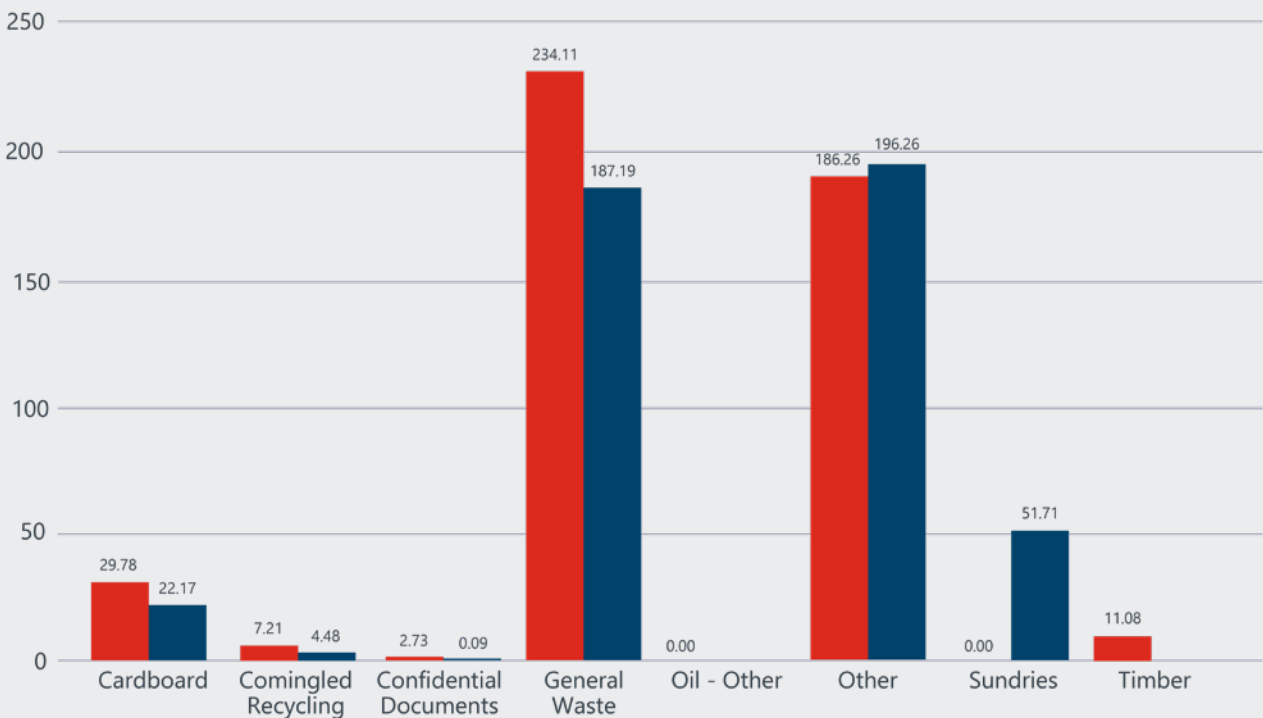
As the largest diversified relocation and records management companies in the country, with more than 50 sites across Australia, and servicing over 100,000 private and corporate customers, we are extremely conscious of our impact when managing and reducing our waste.

Waste management at GCW is managed predominantly through our waste management service provider JJ Richards. Waste services at our facilities consist of scheduled regular services for the pickup and disposal of cardboard waste, general comingled waste and plastic waste bins.

According to data from JJ Richards, GCW achieved a reduction of 9.3 tonnes in total waste across its facilities compared to last year, marking a 2% decrease in overall waste. However, the recycling rate declined from 8.4% to 5.8%, highlighting the urgent need for enhanced recycling infrastructure and greater awareness of recycling behaviours in 2024.

Factors influencing our waste management and reduction performance, including but not limited to:

- Packaging
- Employee behaviours and practices
- Procurement processes
- Facility management and design
- Availability of waste infrastructure and recycling services





# Greenfleet reforestation

**grace:**

The Grace business which is wholly owned by GCW Holdings has established a long-term partnership with Greenfleet to offset its vehicle carbon emissions via native biodiverse reforestation in Australia. In CY 2023, Grace off-set 5,582 tonnes of carbon which is the equivalent of approximately 558 hectares of native reforestation.

Greenfleet uses Full Carbon Accounting Model (FullCAM), developed by CSIRO and approved by the Australian Department of the Environment to measure the carbon uptake of our forest at each planting site. Greenfleet's work is independently audited by Pitcher Partners, using approved methodologies for calculating the carbon that its forests generate over time in accordance with the Forest Practice Codes in each Australian state and territory, including methodology developed by the Australian Government for the Emissions Reduction Fund (ERF).





# 5,582

tonnes of carbon offset  
through Greenfleet



**grace:**



# Social responsibility

grace:

We are committed to making positive social impacts across our business and in the communities we serve. We do this by investing in the health, safety and wellbeing of our people, encouraging inclusive practices, championing regional and remote communities, advancing reconciliation with Indigenous communities and assisting people facing hardship.

We are committed to fostering positive social change both within our business operations and the communities we support. Our approach includes investment in the health, safety, and wellbeing of our workforce, promoting inclusivity, supporting regional and remote areas, furthering reconciliation efforts with Indigenous communities, and aiding our fellow Australians in distress.

## Areas of focus

- Group wide safety
- Indigenous Reconciliation Action Plan
- Supporting First Nations businesses (Supply Nation)
- Supporting HeartKids
- Strategic partnership with Salvos Stores
- Circular economy donations partnership with Salvos Stores
- Diversity & Inclusion strategy



# Employee health, safety and wellbeing

**grace:**

We are committed to making positive social impacts across our business and in the communities we serve. We do this by investing in the health, safety and wellbeing of our people, encouraging inclusive practices, championing regional and remote communities, advancing reconciliation with Indigenous communities and assisting people facing hardship.

Our Work Health, Safety, and Wellbeing Strategy underscores GCW's commitment to the prevention of work-related injuries and illnesses. We achieve this by ensuring that our work environments and conditions foster both physical and psychological safety.

## Key pillars of our Health, Safety & Wellbeing Strategy include:

- Safety as a core value:** Safety is fundamental to all our operations. We are dedicated to creating a work environment where everyone returns home safely and in good health each day.
- Leadership in safety:** We aim to be at the forefront of safety, embracing best practices and continual enhancement to our approaches.
- Cultivating our safety culture:** We prioritise a culture that places a high value on both physical and psychological well-being, encouraging mutual support among our workforce. This fosters not only a safer work environment but also enhanced performance outcomes.
- Empowering our people:** We are committed to building the capabilities of our employees, enabling them to actively participate in and contribute towards creating safer and healthier workplaces.
- Effective partnerships and engagement:** Through effective partnerships and engagement, we collaborate and innovate with industry peers and partners to advance safety practices. Additionally, we engage with our customers and the wider community to promote and share best practices for safer journeys and environments.

Through these core principles, we aim to maintain and enhance our safety culture, ensuring the well-being of our employees and the communities we serve.





In 2023, the percentage of women in executive positions within the business rose from 21% to 25%, following the appointment of three women to senior management roles. The Group continues to prioritise enhancing female representation in both management and non-management positions, aiming for growth in the future.

The gender distribution within the Group stands at 38% female and 62% male, aligning with the national average for our industry.

In 2023, the implementation of flexible working policies, coupled with a focused effort on recruiting women across all business levels, aims to enhance gender diversity and achieve equal pay.

**The GCW team is ethnically and culturally diverse, with more than 50 nationalities represented across our businesses.**

We hold a firm belief that our workforce should mirror the diverse communities where we operate and reside. To this end, we actively foster an environment of respect and tolerance, celebrating cultural diversity through support for workplace events like Harmony Day.



# Indigenous participation and reconciliation

**grace:**

Our vision for Reconciliation aims to forge meaningful and sustainable contributions, in collaboration with Aboriginal and Torres Strait Islander peoples, to bridge the socio-economic gap that currently separates Aboriginal and Torres Strait Islander communities from non-Indigenous Australians.

The GCW Group is dedicated to enhancing our reconciliation endeavours and cultivating significant relationships with Aboriginal and Torres Strait Islander communities.

In 2022, we established a Reconciliation Action Plan (RAP) Working Group. This group plays a pivotal role in steering our reconciliation journey as a business.

Furthermore, we have heightened awareness of key events such as NAIDOC and National Reconciliation Week within our business and among our teams.

## Reconciliation Strategy

1. Creating economic participation and development opportunities for Aboriginal and Torres Strait Islander peoples, including within the regional and remote locations we operate.
2. Creating multiple procurement opportunities for Aboriginal and Torres Strait Islander businesses that will have positive flow-on and multiplier economic effects for First Nations communities.

3. Developing a culturally intelligent environment across our large organisation – directly with employees and contractors, that will have positive outcomes in the many First Nations communities in which we operate.
4. Influencing our supply-chain and customers through policy and sharing successes of participating in reconciliation and supporting Aboriginal and Torres Strait Islander businesses.

Our Reconciliation Action Plan (RAP) is designed to integrate reconciliation into the very fabric of our daily operations and interactions with customers, employees, and communities. It aims to position us as the employer of choice for First Nations peoples by demonstrating our commitment to being a safe, progressive, and dedicated organisation that mirrors the diversity of the community we serve. This commitment is further underscored by our long-term major sponsorship of The Indigenous Literacy Foundation through the Grace partnership.

By nurturing meaningful and positive relationships with Aboriginal and Torres Strait Islander peoples and communities, we aim to gain a deeper understanding of how to create a culturally safe workplace. This, in turn, will enable us to identify and seize opportunities to contribute to the Closing the Gap targets effectively.





# Supporting First Nations businesses

**grace:**

Our membership with Supply Nation, Australia's leading directory of verified First Nations businesses, is enabling the GCW Group to partner with and promote Aboriginal and Torres Strait Islander organisations in our contractor workforce and supply chains.

Through supplier identification and engagement strategies, including the use of Supply Nation, the GCW Group experienced a significant 26% increase in its total spend with First Nations businesses in 2023 compared to the previous year, bringing the total expenditure with Supply Nation certified businesses to \$1,314,363 for CY2023. The engagements have also resulted in tangible benefits for these businesses through increased exposure, expanded market reach, and enhanced capacity to grow their enterprises.

Demonstrating our commitment to supporting Aboriginal and Torres Strait Islander talent and culture, our Grace business commissioned Robert Michael Young, (Gunnai and Waradjuri artist) to produce a bespoke artwork for display at our corporate head offices and reproduction to support our Indigenous Literacy Foundation awareness program.





# 26%

increase in total spend  
with First Nations  
businesses in 2023



**grace:**



The GCW Group is dedicated to promoting ethical governance practices within our organisation and supply chain.

## Areas of focus

- Stakeholder and Industry Engagement
- Development of Modern Slavery Statement and Reporting
- Supply Chain Compliance including Contractor and Suppliers
- Data privacy and cyber security

As an industry leader, we recognise the critical importance of proactive measures to significantly reduce the risk of modern slavery within our operations. Moreover, we acknowledge the significant benefits of establishing strong collaborations with our suppliers to ensure both compliance and transparency.

The GCW Group is dedicated to creating a comprehensive ESG governance strategy, integrating environmental, social, and governance factors into our organisation's strategic decision-making, operational activities, and engagement with stakeholders.

A pivotal achievement in 2023 was the publication of our annual Modern Slavery Statement, highlighting our dedicated efforts in this crucial area. Furthermore, we have initiated an extensive awareness training program aimed at enhancing modern slavery awareness among our employees. This program is designed to equip our managers with the necessary knowledge and skills to identify and tackle these challenges effectively. Additionally, we are in the process of developing targeted training programs focusing on anti-bribery, corruption, and anti-competitive practices, ensuring our workforce is fully prepared to maintain our standards of ethical conduct.

We are also advancing the implementation of supplier pre-qualification software that incorporates environmental, social, and governance questionnaires into our procurement processes. This ensures that we partner with suppliers who align with our values. Through these initiatives, the GCW Group is proactively driving change and cultivating a culture of responsible governance across our organisation and within our supplier network.



# Collaboration with business and industry

**grace:**

At the GCW Group, our success and growth are significantly bolstered by our collaboration with both local and international relocations, records management industries, and a variety of other businesses. In 2024, our MoveDynamics relocation procurement business is particularly focused on deepening our strategic partnerships with SME companies that share our vision and enhance our capabilities. This focus encompasses compliance, training and the exchange of knowledge.





# Sustainable procurement

**grace:**

Our updated Supplier Code of Conduct and supplier standard terms and conditions set out the expected behaviours required of our suppliers. This includes that they will act with respect and comply with all applicable employment and workplace laws and regulations, including labour, and child labour laws. It also allows us to audit suppliers and their operations to ensure compliance. In order to collect ESG information from our existing and potential suppliers, we have developed a comprehensive ESG due diligence questionnaire and Modern Slavery Survey.

Our Procurement policies have also been updated to consider social factors and environmental conscious purchasing. This includes selecting suppliers who share our commitment to sustainability, evaluating their environmental and ethical practices, and encouraging the use of recycled or renewable materials.

The GCW Group will in 2024, introduce and implement Camms.Risk | Enterprise Risk Management, a contractor and supplier compliance management system to enhance visibility and compliance across our supply chain and track ESG requirements.





The GCW Group is taking significant steps towards addressing modern slavery including the undertaking of a Modern Slavery Hotspot Analysis to identify areas of concern and vulnerability within our supply chains. A dedicated Modern Slavery Working Group has also been formed comprising of diverse stakeholders within our organisation, to develop a comprehensive three-year roadmap, which will outline our strategies and action plans to combat modern slavery and meet our reporting obligations under the Australian Modern Slavery Act.

The Modern Slavery Working Group will be integral in establishing our organisational actions and monitoring effectiveness. We have introduced qualitative and quantitative indicators to assess this performance and we are committed to achieving this roadmap and strengthening our modern slavery risk management framework.

## Key focus areas

- Prioritising our actions to address the inherent modern slavery risks identified in our supply chain.
- Developing and rolling out a modern slavery capacity building program for our employees.
- Partnering with relevant national and international Modern Slavery and Human Rights-related organisations and Industry associations to share best practices and knowledge.
- Introduce an ESG prequalification and compliance management system to collect and manage supplier related ESG data.

Additionally, our Learning and Development team have developed a Modern Slavery training module within our internal HR platform to enhance team knowledge and awareness in this area.

## 2023 Modern Slavery Roadmap progress

- Modern Slavery Working Group created
- 3-Year Modern Slavery Roadmap developed
- GCW procurement policy and standard supplier terms and conditions renewed to include relevant Modern Slavery requirements
- GCW supplier code of conduct renewed to include Modern Slavery requirements
- GCW supplier ESG due diligence questionnaire introduced and implemented
- Modern Slavery awareness completed for relevant stakeholders
- Modern Slavery training course developed in internal HR training platform
- Across the GCW Group, we are committed to building and maintaining a responsible and sustainable supply chain with suppliers who share our commitment to responsible and sustainable practices.

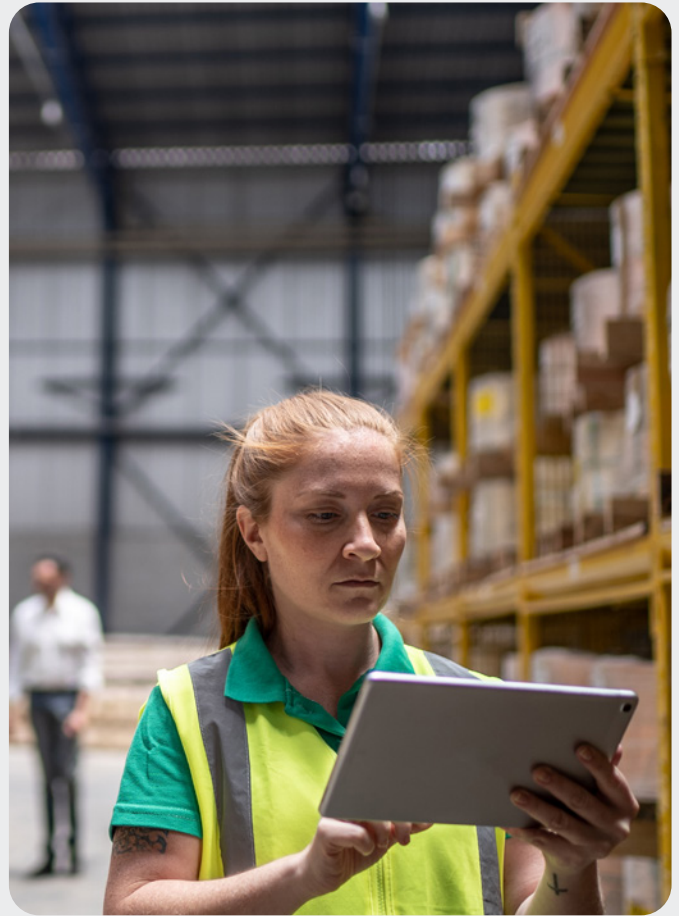




# Anti-bribery and anti-corruption

**grace:**

Bribery and corruption present significant challenges for businesses worldwide, eroding economic development, skewing competition, and hindering sustainable progress. Bribery involves the exchange of value to sway the decisions of someone in a position of authority, while corruption is the exploitation of power for personal benefit, often manifesting as bribery, fraud, embezzlement, or nepotism.



At GCW, we are dedicated to ethical business practices and have a zero-tolerance approach towards bribery and corruption. We are committed to cultivating a culture of integrity, supported by comprehensive policies, thorough training, and collaborative efforts, to ensure sustainable growth and maintain our excellent reputation. To align with anti-bribery and corruption legislation, we have enacted a detailed Anti-bribery and Corruption Policy. This policy underscores our zero-tolerance stance against bribery and corruption and sets forth the expectations for directors, employees, and third parties to adhere to the highest ethical standards. These principles are integral to the GCW Code of Conduct training, which is obligatory for all employees.

# Data privacy and cyber security

**grace:**

At GCW, our dedication to data privacy and cyber security transcends mere legal and regulatory requirements; it is a cornerstone of our corporate ethos. We are committed to protecting data and ensuring industry leading cyber security to uphold the confidentiality, integrity, and availability of our systems. This commitment not only fosters trust but also guarantees the safeguarding of sensitive customer information throughout our operations.

At GCW, our dedication to data privacy and cyber security transcends mere legal and regulatory requirements; it is a cornerstone of our corporate ethos. We are committed to protecting data and ensuring industry leading cyber security to uphold the confidentiality, integrity, and availability of our systems. This commitment not only fosters trust but also guarantees the safeguarding of sensitive customer information throughout our operations.

We have established a comprehensive cyber security defence and risk management framework designed to shield sensitive information and ward off cyber threats. Additionally, we conduct cyber security training to equip our team with knowledge of best practices and awareness of potential risks. In line with our data privacy pledge, we have recently achieved SOC2 compliance, reinforcing strict data authentication protocols. Moreover, we continue to invest in advanced IT infrastructure to enhance data security, demonstrating our unwavering commitment to protecting our stakeholders.

Our commitment to data privacy, protection and cyber security, we have committed to the following initiatives:

## **Adopt Essential Eight Australian CyberSecurity Framework by the Australian Cyber Security Centre (ACSC) including the following Eight Principles:**

1. patch applications
2. patch operating systems
3. multi-factor authentication
4. restrict administrative privileges
5. application control
6. restrict Microsoft Office macros
7. user application hardening
8. regular backups.

## **Comply with and manage the following Accreditations and Standards for Information & Data Security which is audited externally annually:**

- Payment Card Data (PCI:DSS)
- ISO 27001 Security (ISMS) Information Security Management System
- ISO 31000 (Risk Management)
- FIDI-FAIM Plus Accredited International MoverAccredited international removalists
- SOC II, Type II Report





