

Media Confidentiality Policy



GSS Group
ABN: 12 668 595 382
F01/122 Studio Ln, Docklands VIC 3008

Date: 03/02/2026
Review: 01/02/2027

1. Obligation

- (a) It is a condition of the employment of all employees of GSS Group Pty Ltd, that employees agree to keep all Confidential Information (as defined in this policy) confidential.
- (b) Employees agree to not disclose or make public any Confidential Information to the media without the prior written approval of the Company.
- (c) Each employee of the Company acknowledges and agrees that the Confidential Information is, and always remains, the exclusive property of the Company. No employee may have, or assert, any proprietary or intellectual interest or right in the Confidential Information.
- (d) A breach of these obligations of confidentiality by any employee of the Company will be regarded by the Company as serious misconduct. The Company reserves the right, if any employee commits such breach, to commence disciplinary action or terminate the employee's employment without notice.

2. Definitions

Confidential Information means any trade secrets, incidents or confidential information relating to, or belonging to, the Company, or any Related Body Corporate of the Company including, but not limited to, any such information relating to:

- (a) customers or clients;
- (b) customer lists or requirements;
- (c) suppliers;
- (d) terms of trade;
- (e) pricing lists or pricing structures;
- (f) marketing information and plans;
- (g) Intellectual Property;
- (h) Inventions;
- (i) business plans or dealings;
- (j) operational data;
- (k) employees or officers; financial
- (l) information;
- (m) plans, designs, product lines;
- (n) any document or incident identified as being confidential by the Company;
- (o) research activities; and

(p) software and the source code of any such software.

Confidential Information does not include information which:

- (a) is generally available in the public domain; and
- (b) was known by you prior to the disclosure by the Company, its employees, representatives or associates.

Intellectual Property means all intellectual proprietary rights, whether registered or unregistered, and whether existing under statute, at common law, or in equity throughout the world including, without limitation:

- (a) all trademarks, trade names, logos, symbols, brand names or similar rights, registered or unregistered designs, patents, copyright, circuit layout rights, trade secrets and the right to have confidential information kept confidential; and
- (b) any application, or right to apply, for any rights referred to in (a) above.

Inventions means any invention, discovery, idea, development, process, plan, design, formula, specification, program or other matter or work whatsoever, including all improvements made to any matter or work.

Related Body Corporate has the meaning given in section 50 of the Corporations Act 2001 (Cth).

3. Conduct which breaches this policy

- (a) Conduct which breaches this policy is unacceptable.
- (b) Depending on the severity and circumstances, breach of this policy may lead to disciplinary action, regardless of the seniority of the particular employee involved.
- (c) Disciplinary action might include any of:
 - (i) demotion.
 - (ii) a formal warning; and
 - (iii) dismissal.

4. Pay secrecy

For clarity, this confidentiality policy does not restrict the employee's rights under the Fair Work Act 2009 (Cth) and the Fair Work Legislation Amendment (Secure Jobs, Better Pay) Act 2022 (Cth) with respect to pay secrecy provisions that allow them the right to:

- (a) share or not share information about their own pay or the employment terms and conditions in their employment contract needed to work out the employee's pay; or
- (b) ask other employees about their pay or the employment conditions that would permit the employee to work out their pay.

5. Further information

If you have any questions about this policy, please speak with your Manager or peopleandculture@gssgroup.au .

Endorsed by:

Imran Mukhtar

Managing Director February 2026

A handwritten signature in black ink, appearing to be 'Imran Mukhtar', written over a horizontal line.