

# CPT Global Code of Conduct

## *Commitment to the Code of Conduct*

The Board, management and all employees and Consultants of CPT Global Limited are committed to implementing the Company's core principles and values as stated in this Code of Conduct when dealing with customers, clients, Government authorities, creditors and the community as a whole as well as other employees and Consultants.

The Company is dedicated to delivering outstanding performance for investors, customers, consumers, employees and Consultants. The company aspires to be the leader in its field while operating openly with honesty, integrity and responsibility and maintaining a strong sense of corporate social responsibility. In maintaining its corporate social responsibility the Company will conduct its business ethically and according to its values encourage community initiatives, consider the environment and ensure a safe, equal and supportive workplace.

## *Responsibilities to Shareholders and the Financial Community Generally*

The Company is committed to delivering value to its shareholders and to representing the Company's growth and progress truthfully and accurately. The Company also complies with the spirit as well as the letter of all laws and regulations that govern shareholders' rights.

The Company is committed to safeguarding the integrity of financial reporting and as such will openly promote and instigate a structure of review and authorisation designed to ensure the truthful and factual presentation of the Company's financial position. The Company will prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations of the country in which the Company conducts its business.

## *Responsibilities to Clients, Customers and Consumers*

Each employee and Consultant has an obligation to use their best efforts to deal in a fair and responsible manner with each of the Company's clients, customers and consumers. Each employee and Consultant will assist the Company in the delivery of superior service and product quality to each client, customer and consumer. The Company regards ethics, honesty and clear communication as the cornerstones of its reputation and allow the Company to build successful and lasting business relationships.

The Company for its part is committed to providing clients, customers and consumers with fair value.

## *Employment Practices*

The Company will:

- Provide a workplace that is safe for employees and Consultants and that complies with the spirit as well as the letter of workplace health and safety laws.
- Promote equal opportunity for all employees and Consultants at all levels of the Company irrespective of colour, race, gender, age, ethnicity or religious beliefs.
- Provide equal opportunity to all qualified individuals in recruitment, compensation, promotion, training and other employment practices.
- Compensate all employees and Consultants, including those working outside Australia, in a fair and ethical manner and where appropriate, in accordance with Company policy, provide special entitlements above the statutory minimum.
- Encourage employee share ownership but will instigate and enforce policies regarding trading in those securities where employees have inside information.
- Provide opportunities for employee and Consultant training and education both through the provision of training and the support of employees and Consultants pursuing further education outside of the Company.

- Recognise the need from time to time to give or accept customary business courtesies in accordance with ethical business practices. However employees and Consultants will not solicit such courtesies and will not accept gifts, services, benefits or hospitality that might influence, or appear to influence, the employee's and Consultants conduct in representing the Company.
- Not tolerate the offering or acceptance of bribes, inducements or unauthorised commissions by any of its employees, Consultants or officers.
- Not tolerate the misuse of Company assets or resources and employees and Consultants will not use such assets or resources for their own benefit.
- Seek to avoid conflicts of interest so that an employee's or Consultants interests, or the interests of a family member of the employee or Consultant, do not affect the way he or she handles the Company's business.
- Not tolerate employees and Consultants being under the influence of illegal drugs or adversely affected by alcohol while on Company premises or while at work off Company premises.

#### *Obligations Relative to Fair Trading and Dealing*

The Company strives to deal fairly with the Company's customers, suppliers, competitors, employees and Consultants and encourages its employees and Consultants to strive to do the same. Employees and Consultants are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other practice that involves unfair dealing.

In its competitive environment the Company will compete fairly and ethically and in accordance with the competition laws of Australia and of each country in which the Company operates. The Company aims to conduct its business fairly. It will compete solely on the qualities of its services. The Company deems false statements, misleading statements or innuendo as being inappropriate and unacceptable.

As part of its commitment to fair trading the Company has adopted a policy that employees and Consultants will:

- Fulfil the Company's requirements in awarding orders, contracts and commitments to suppliers of goods and services on a sound business basis and on the ability of the customer or supplier and that their decisions will not be based on personal favouritism.
- Not unfairly differ between customers when supplying products or services.
- Not refuse to deal with, or discriminate against, a customer for any improper reason.
- Not intimidate or threaten another person or organisation.

#### *Responsibilities to the Community*

##### The Environment

The Company is committed to conducting its business in accordance with the spirit and letter of all applicable environmental laws and regulations. To this end the Company encourages all employees and Consultants to have regard for the environment when carrying out their duties.

##### Donations and Sponsorship

The Company receives a number of requests for sponsorship either in the form of monetary donations or in kind. As a result the Company has developed an approved list of charities that it supports. This list changes from time to time.

The Company does encourage all employees and Consultants to donate to community organisations from their personal funds. However it should be made clear that all such donations are from the employee and Consultant personally and not from the Company.

## *Responsibility to the Individual*

### Privacy

The Company receives private information from its employees. Unless required by law such personal information will not be shared with a third party without the consent of the employee or Consultant. Within the Company personal information on employees and Consultants will only be provided on a need-to-know basis and will only be used for the purpose for which it was intended.

Similarly employees and Consultants will often be furnished with personal information from clients, customers, consumers and investors. Unless required by law such personal information will not be shared with a third party without the consent of the person providing the information.

### Confidential Information

All employees and Consultants must maintain the confidentiality of business information and protect it from any disclosure. This obligation of confidentiality applies while engaged as an employee or Consultant as well as after ceasing to be an employee or Consultant of the Company.

Information that must be kept confidential includes internal confidential or proprietary information related to the Company's business, technological and other knowledge, processes, computer passwords, computer software, product formulations, business strategies and plans and information concerning the Company's operations, customers, vendors, suppliers, employees and Consultants.

### Conflicts of Interest

Where an individual's private interests are at variance in any way with the interests of the Company as a whole a conflict of interest exists. Further, a conflict of interest can be seen to exist where an employee or Consultant, or one of their family members, has a direct or indirect financial interest in, or receives any compensation/other benefit from any individual or firm that:

- Sells material, equipment or property to the Company.
- Provides any service to the Company.
- Has business dealings or contractual relations with the Company including leases and purchases.
- Is engaged in a similar business or competes with the Company.

Employees, Consultants and Directors must avoid conflicts between personal interests and the interests of the Company, or even the semblance of such interests. Where an employee, Consultant or Director is concerned that there may be a conflict of interest it should be discussed with the CEO or Company Secretary as soon as possible.

## *How the Company Complies with Legislation Affecting its Operations*

### Within Australia

The Company strives to comply with the spirit and the letter of all legislation affecting its operations.

### Outside Australia

The Company will abide by local laws in all countries in which it operates. However the Company recognises that the laws in some countries may not be as stringent as the Company's operating policies, particularly in relation to the environment, workplace practices, intellectual property and the giving of gifts. Consequently where Company policy is more stringent than the local laws Company policy will prevail.

## *How the Company Monitors and Ensures Compliance with its Code*

The Board, management and all employees and Consultants of the Company are committed to implementing this Code of Conduct. Therefore it is up to each individual to comply with the code and they will be accountable for such compliance. Where an employee is concerned that there has been a violation of this code it can be reported in good faith to the CEO or Company Secretary. While a record of such reports will be kept by the Company for the purposes of the investigation, the report may be made anonymously. No one making such a report will be subject to any form of retribution.

The disciplinary measures that may be imposed for violations of this code include, but are not limited to, counselling, verbal or written reprimands, warnings, suspension without pay, demotion, reduction in salary, termination of engagement or restitution.