

Corporate Governance Policy No 4 – Whistle blowing

Introduction

CPT Global Limited is committed to excellence in the quality of its services, openness to ideas and concerns and honesty and accountability of all who make this company successful. In an effort to achieve this commitment the company seeks to establish a policy that complies with applicable laws and practices including AS 8004-2003 (*Whistleblower Protection Programs for Entities*) to encourage reporting of reportable conduct as defined below.

The purpose of this policy is to put a confidential and secure mechanism in place to protect employees and Consultants against conduct such as dishonesty or fraud, while assisting the company in achieving its commitment to excellence. The company's commitment to a culture of corporate compliance and ethical behaviour is seen as a benefit to everyone who has contact with the company including employees, Consultants, Directors, shareholders and customers.

Reportable Conduct

A Director, Manager, employee or Consultant of the company should report the following conduct ("reportable conduct") when observed by that person acting in good faith:

1. Dishonesty.
2. Fraud.
3. Corruption.
4. Illegal acts including theft, drug sale or use, violence or threatened violence and criminal damage against property.
5. Breaches of Commonwealth or State legislation or local authority by laws (e.g. *Corporations Act*, *Trade Practices Act* or *Income Tax Assessment Act*).
6. Unethical conduct.
7. Serious improper conduct.
8. Unsafe work practices.
9. Any other conduct which may cause financial or non financial loss to the company or be otherwise detrimental to the interest of the company.

Reporting Procedure

A Director, Manager, employee or Consultant of the company who wishes to make a report in connection with reportable conduct should contact the Company Secretary (Stephan Scheffer) by telephone on 03 9690 3911, in writing to Company Secretary – Level 1 4 Riverside Quay Southbank 3006 or by email to sscheffer@cptglobal.com.

The company is committed to ensuring that the Whistleblower Protection Officer is appropriately qualified for this role and is accessible to all staff.

All persons making reports should be sure of the truth of their concerns before reporting the conduct. All reports will be kept confidential and secure within the law. However if anonymity during the investigation cannot be maintained a person may request relocation or a leave of absence.

Investigation of the report will include locating evidence which may necessitate a request for more information from the person who made the report. The company will provide a person who has made a report with feedback on the investigation into the reportable conduct and protection from retaliation. Those persons are assured that making the report will not personally disadvantage them by dismissal, demotion, any form of harassment, discrimination or current or future bias.

Should a person who has reported some reportable conduct believe that they have experienced any such disadvantage they have an automatic right of appeal to the Chairman of the Board - Fred Grimwade whose decision will be complied with.

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Investigation Procedures

All reports of reportable conduct will be the subject of a thorough investigation by the Company Secretary with the objective of locating evidence that either substantiates or refutes the claims made in the report. Best practices will be followed by the Whistleblower Investigations Officer who will be fair and independent of the person who made the report, the business team concerned or the person who is the subject of the reportable conduct.

The investigation will include the following steps:

1. Full details of the allegations will be obtained.
2. The person against whom the allegation is made will be informed.
3. Involvement of external parties such as the Auditor or police will be considered by the CEO or Chairman as appropriate.
4. Allegations will be fully investigated.
5. The CEO or Chairman will decide on what action is to be taken.
6. The person who made the report will be kept informed of the progress made during the investigation.

Where the CEO or the Chairman decides that the allegations are very serious, external investigators will be engaged.

The company is committed to rectifying any wrongdoing verified by the investigation to the extent practicable in all the circumstances. All verifiable corruption and compliance failures will be dealt with appropriately.

The identity or any information that could lead to the identity of a person who has made a report will not be released to any person who is not involved in the investigation or resolution of the matter.

Abuse of Reporting Process

Abuse of the confidential reporting process will not be tolerated. Maliciously reporting unfounded allegations will be treated as a serious breach of the company's Code of Conduct. All reports made under the confidential reporting process must be made in good faith.

Monitoring and Training

The company will monitor and review this policy regularly to assess its effectiveness in encouraging the reporting of reportable conduct, protection of persons making reports, investigating fairly and effectively and rectifying verified wrongdoing.

This monitoring will be facilitated by reports to the Board that will not compromise confidentiality. Training and education regarding this policy will be conducted on a regular basis and will include practical advice on how to avoid corrupt practices, the importance of this policy and the company's Code of Conduct.