

# CPT GLOBAL CODE OF CONDUCT

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## **Objective of Policy**

The purpose of this Code of Conduct is to provide guidance on the standard of conduct that is expected of all employees and contractors of CPT Global Limited and each of its subsidiary companies ("CPT") in Australia and in all other countries where CPT operates.

## **Application of Policy**

This Code applies to all employees and contractors ("staff") of CPT and, where appropriate, all other persons who attend CPT's premises or CPT organised work activities. It extends to all work-related situations that are approved, organised or funded by CPT (including for example, work-related meetings, lunches, dinners, conferences functions and other events).

## **Standards of Personal and Professional Conduct**

Staff are expected to treat each other with respect, honesty and integrity.

Staff are expected to act professionally, ethically and in the best interests of CPT and to deal in a fair and reasonable manner with CPT's clients, partners and suppliers.

At all times staff are expected to promote and create a workplace that is safe for all and provides equal opportunity for all staff.

Staff must dress in a manner that is appropriate for the environment in which they are working, is respectful of others and is safe.

Staff are also expected to always present a professional image and be mindful, particularly when on client sites, of the impact appropriate dress will have on client perceptions of us, and of CPT.

Work areas must be maintained in a clean and organised state.

Staff must attend work as required and be punctual in their attendance and when returning from meal breaks and travel between work sites. If unavoidably detained from work, staff members must advise their manager/supervisor as soon as possible.

Staff are expected to participate fully in any training as required by CPT.

Staff must be fit for work when performing their duties and must advise their manager/supervisor if they have a medical or other condition which would affect the performance of their duties or pose a risk to the health and safety of themselves or others. If the condition is of a sensitive nature, a staff member may alternatively advise the Head of People Operations.

Within the workplace or when performing CPT duties, staff must not be under the influence of illegal drugs, controlled substances used for non-medical purposes, or alcohol.

Consumption of alcoholic beverages on CPT premises is only permitted during company organised events.

Staff must comply with all lawful and reasonable directions given by CPT.

Staff must be aware of, understand and comply with the policies and procedures of CPT.

Staff must comply with all relevant laws, regulations, codes, standards and guidelines that are applicable to them and to CPT in the location where the staff member is working.

Staff must not use recording devices, including cell phone cameras and web cameras, within CPT's offices or on client sites (unless authorised by a Manager).

A staff member should not enter into or maintain a romantic relationship with a subordinate.

The confidential information and intellectual property of CPT and its clients must always be strictly protected from unauthorised use or disclosure, including any personal information which may come into a staff member's knowledge or possession.

Staff must not approach or respond to the media on any issue concerning CPT, other than with the express permission of the CEO.

Staff must only use the property of CPT or its clients (including all equipment, facilities, vehicles and all CPT and client information) for work or other authorised purposes and must take all reasonable care in that use. If requested by the owner of such property or upon the termination of employment (for employees) or engagement (for contractors), all CPT or client property in the staff member's possession or control must immediately be returned.

Staff must avoid any situation that could lead to an actual or perceived conflict of interest and notify your manager/supervisor or the Head of People Operations if such a situation arises or may arise. This includes refusing any gifts, favours, inducements or gratuities if they are, or could be perceived to be, a secret commission, bribe, kick-back, or pay off and reporting them to a manager/supervisor or to the Head of People Operations.

Staff should conduct their personal affairs outside working hours in a manner that does not affect the performance of their duties and responsibilities to CPT or in any way harm the reputation of CPT.

### **Breaching this Code**

In the event that CPT reasonably forms the opinion that a staff member's conduct on or off the job adversely affects their performance, that of other staff, or CPT's legitimate business interests, that person may be subject to disciplinary action, including dismissal (employees) or termination of contract (contractors).

Employees who breach this Code may be subject to disciplinary action, including without limitation, counselling, verbal or written reprimands, warnings, suspension without pay, demotion, or restitution. In serious cases this may include termination of employment.

Contractors who breach this Code may be subject to counselling, verbal or written warnings, suspension or restitution. In serious cases, their contracts with CPT may be suspended or terminated.

Visitors who breach this Code may be asked to leave CPT's premises. Their return will be allowed only (if at all) on condition they abide by this Code.