

Policy

CODE OF CONDUCT

All CPT employees and contractors can access this policy via CPT's SharePoint site which can be accessed via <https://cptglobal.sharepoint.com>, under [Resources > Policies](#).

Objective of Policy

The purpose of this Code of Conduct is to establish standards of conduct that are 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.

CPT is committed to high standards of integrity, transparency, and accountability. This Code reflects those commitments and supports compliance with CPT's legal and regulatory obligations, including the ASX Corporate Governance Principles.

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).

The Board and senior management are responsible for promoting and monitoring compliance with this Code and are expected to lead by example.

Standards of Personal and Professional Conduct

Respect, Integrity and Inclusion

1. Staff are required to treat each other with respect, honesty and integrity.
2. Staff are required 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.
3. At all times staff are required to promote and create a workplace that is free of all types of discrimination, harassment and bullying, is safe for all and provides fair and equal opportunity for other staff members.
4. Staff must 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.

Workplace Behaviour and Responsibilities

5. Staff must attend their usual work site(s) as required (whether office based, client based or home based) and be punctual in their attendance and availability for work, including when returning from meal breaks and travel between work sites. If unavoidably detained from work, staff members must advise their manager as soon as possible.
6. Staff are expected to participate fully in any training as required by CPT.

7. Staff must comply with all lawful and reasonable directions given by CPT.
8. Staff must be aware of, understand and always comply with the policies and procedures of CPT.
9. A staff member should not enter or maintain a romantic or intimate relationship with a subordinate, their Manager or another person in their direct work team.
10. 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.

Health, Safety and Wellbeing

11. Staff must be fit for work when performing their duties and must advise their manager 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 Chief of Staff.
12. 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, and then, only in moderation.
13. Staff must comply with occupational health and safety requirements and promptly report hazards, risks or incidents.

Professional Presentation and Work Environment

14. Staff must dress in a manner that is appropriate for the environment in which they are working, including client sites. Staff are required 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 themselves, other CPT staff, and of CPT generally.
15. Work areas must be maintained in a clean and organised state. Information of a confidential or sensitive nature must be securely stored when not in use and not be left unattended in work areas. Computers must be turned off when not in use or at the end of a day.

Use of Technology and Information

16. Staff must not use recording devices, including cell phone cameras and web cameras, within CPT's offices or on client sites unless permission is obtained by all meeting participants.
17. Staff must use CPT's IT systems, email, internet and collaboration tools responsibly and primarily for business purposes.
18. Staff must not use social media or public channels in a way that could harm CPT's reputation, disclose confidential information, or breach this Code.

19. 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.
20. Staff must not approach or respond to the media on any issue concerning CPT, other than with the express permission of the CEO.

Use of Company and Client Property

21. 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.
22. If requested by the owner of such property or upon the termination of employment (for employees) or engagement (for contractors), all CPT and client property in the staff member's possession or control must immediately be returned to its owner.

Conflicts of Interest

23. Staff must avoid any situation that could lead to an actual or perceived conflict of interest and notify your manager or the Chief of Staff 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 or to the Chief of Staff.

Anti-Bribery and Corruption

24. CPT has zero tolerance for bribery, corruption, facilitation payments, secret commissions or improper inducements of any kind. Dealings with clients, suppliers, government officials and other stakeholders must always be conducted honestly, transparently and professionally.

Securities Trading and Inside Information

25. As an ASX-listed company, CPT is subject to strict laws on insider trading. Staff must not use or disclose non-public, price-sensitive information about CPT (or its clients) for personal gain or to benefit others. All staff must comply with CPT's Securities Trading Policy.

Diversity, Equity and Inclusion

26. CPT is committed to building a diverse and inclusive workplace where all staff have equal opportunity to contribute and succeed. This Code should be read in conjunction with CPT's Diversity, Equity and Inclusion Policy.

Whistleblowing and Reporting Misconduct

27. Staff are encouraged to raise concerns if they believe a breach of this Code, CPT policy or the law has occurred. Concerns can be raised with your manager, the Chief of Staff, or in

28. accordance with CPT's Whistleblower Policy. CPT will not tolerate retaliation against any person who raises a concern in good faith.

Breaching this Code

If CPT reasonably forms the opinion that a staff member's conduct on or off the job breaches this Code, adversely or may adversely affect their performance, the performance of other staff, or CPT's legitimate business interests, the staff member 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 agree to abide by this Code.

Governance and Review

This Code is overseen by the Board of CPT and will be reviewed regularly to ensure it remains effective, relevant, and aligned with CPT's values, obligations and ASX Corporate Governance Principles.

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