

Policy C11

Environmental, Social & Governance (ESG) Policy

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](#).

Purpose

This policy establishes CPT Global's commitment to Environmental, Social, and Governance (ESG) principles. It sets high-level expectations for sustainable operations, social responsibility, ethical conduct, and transparent corporate governance across all business activities.

Scope

This policy applies to CPT Board members and to all employees and contractors ("staff") throughout CPT Global Limited and each of its subsidiary companies ("CPT"), in Australia and in all other countries where CPT operates. It complements other CPT policies, including, but not limited to:

- Code of Conduct (A1)
- Bullying, Harassment and Anti-Discrimination (A5)
- Whistleblower Protection Policy (C8)
- Modern Slavery Policy (C9)
- Anti-Bribery & Corruption Policy (C12)

Policy Principles and Definitions

Within CPT's business, ESG means:

- **Environmental:** CPT aims to reduce carbon emissions, use renewable energy, minimise single-use plastics, recycle, and reduce its environmental footprint. This includes optimising office space and using energy-efficient practices.
- **Social:** CPT promotes workplace diversity and equity, complies with employment laws, ensures health and safety, protects data privacy, and combats modern slavery. We support community engagement and ethical suppliers.
- **Governance:** CPT upholds anti-bribery measures, fair pay structures, avoids political contributions, and maintains transparent board and operations management.

Environmental Commitment

CPT is committed to responsible environmental stewardship, recognising that even as an office-based professional services organisation with a small environmental footprint, CPT has a meaningful role to play in advancing sustainability. CPT's approach focuses on embedding

environmentally responsible practices across operations and continuously improving through targeted, practical actions.

- **Energy Efficiency**
 - The CPT Global Head Office operates from a high-performance building certified with a 5-Star NABERS Energy rating, 6-Star NABERS Water rating, and Gold WiredScore™ certification, reflecting best-practice standards in energy efficiency, water stewardship, and digital connectivity.
 - CPT actively reduces operational energy consumption by ensuring unused equipment is powered down, prioritising energy-efficient devices, and leveraging cloud-based services to minimise on-site energy demand.
- **Travel**
 - CPT actively reduces travel-related emissions by promoting public transport, carpooling, and the use of low-emission vehicles wherever feasible. Flexible working practices, including remote work and virtual meetings, are offered to minimise unnecessary travel and lower our carbon footprint.
- **Resource Conservation**
 - CPT is committed to reducing waste and eliminating avoidable environmental impacts. Single-use plastics are actively avoided, and a comprehensive recycling program is implemented at the Head Office. CPT monitors waste by source and weight using the Bintracker app, which captures data via bin room scales and offers real-time reporting and exportable insights.
 - CPT prioritises digital-first operations to significantly reduce paper and printing consumption. Printer settings are defaulted to minimise paper and ink usage, and all printer toner cartridges are responsibly recycled.
 - Guided by a precautionary approach to environmental challenges, CPT actively supports and promotes the adoption, development, and diffusion of environmentally responsible technologies across its operations.

Social Commitment

CPT is dedicated to upholding human rights, equity, and workplace safety and focuses on:

- Providing a diverse and inclusive workplace where all staff are treated with dignity and respect, regardless of background or identity.
- Prioritising the health, safety, and well-being of all staff by ensuring a safe work environment, promoting work-life balance, and fostering professional growth and development.
- Offering an Employee Assistance Program (EAP) and counselling sessions to all CPT staff and their families on a needs-basis.
- Ensuring employment and engagement standards comply with relevant legislation and are embodied in standard agreements in each jurisdiction where CPT has staff.
- Mandating a comprehensive online training program to ensure staff understand and comply with all expected conduct and behaviours.
- Recognising and supporting internationally proclaimed human rights and ensures our operations and relationships do not contribute to human rights abuses.

- Upholding freedom of association, the right to collective bargaining, and prohibits forced labour and child labour.
- Actively participating and supporting communities through sponsorship, involvement in fund raising events and partnering with local organisations to promote community programs.
- Wherever feasible, procuring provisions from businesses who:
 - prioritise ESG objectives in their operations and product offerings; or
 - are operated by members of minority groups, including, but not limited to, Indigenous peoples, racialised communities, persons with disabilities, and other underrepresented groups.

Governance Commitment

CPT maintains high ethical standards, complies with all laws and regulations and works against corruption in all its forms, including bribery, extortion and facilitation payments. CPT ensures transparent decision-making and behaviour across operations including corporate governance, legislative compliance, risk management, and staff and community development.

The company is governed by a Board of Directors which includes two non-executive, independent directors and operates under a Charter. The Board appoints a Managing Director/CEO who leads an Executive Team responsible for daily operations. The Board delegates decision-making authority to the CEO and Executive Team according to a Delegations Matrix. All meetings and decisions are documented, and operations are supported by robust systems and policies.

Key areas of focus include:

- **Governance Integrity:** As a publicly listed company on the Australian Stock Exchange (ASX) and constituted under the Corporations Act 2001 (Commonwealth), CPT adheres to extensive legal and reporting requirements including filing an Annual Report and holding an Annual General Meeting.
- **Ethical Operations:** Implementation and monitoring of policies to ensure fair and ethical practices and training staff to meet code of conduct standards.
- **Equitable Remuneration:** The Remuneration Committee (a subcommittee of the Board) oversees fair pay structures, ensuring compensation meets community and shareholder expectations, and rewards staff appropriately.
- **Comprehensive Policies:** Maintaining a set of policies and a certified Quality Management System (ISO9001), with a culture of continuous improvement and annual internal and external audits.
- **Risk Management:** The Audit and Risk Committee (a subcommittee of the Board) provides independent assurance that CPT's risk management and internal control systems are sound and operating effectively.

Enabling Clients Achieve ESG Targets

CPT's services and technology solutions play a decisive role in enabling clients to achieve their ESG targets by maximising the performance of existing infrastructure and significantly reducing the need for additional technological expansion. Through intelligent optimisation, CPT helps

organisations lower environmental impact while sustaining operational excellence and scalability.

By streamlining workflows and optimising resource allocation, CPT delivers measurable improvements in efficiency alongside meaningful reductions in energy consumption and carbon emissions. This integrated approach directly supports sustainability objectives while enhancing cost efficiency, ensuring that environmental responsibility and economic performance progress in parallel.

1. **Delivering Measurable Energy and Carbon Reductions:** CPT's energy-efficient solutions generate verifiable reductions in energy use and carbon footprint, translating into tangible environmental outcomes and long-term cost savings.
2. **Strengthening ESG Compliance and Readiness:** CPT enables clients to meet current ESG and regulatory requirements while proactively preparing for future standards, reducing risk and ensuring sustained compliance.
3. **Demonstrating ESG Performance with Evidence:** CPT empowers clients to substantiate their sustainability commitments through quantifiable improvements in energy efficiency and environmental impact.

CPT's service portfolio provides a clear and practical pathway for embedding environmental responsibility into day-to-day business operations. By leveraging existing assets and optimising technology investments, CPT enables organisations to meet ESG commitments with confidence, resilience, and long-term value creation.

Technology is a critical driver of ESG progress. CPT remains committed to advancing solutions that deliver real, measurable energy savings, helping clients strengthen stakeholder trust, future-proof their operations, and make a demonstrable contribution to broader ESG objectives.

Alignment to the United Nations Global Compact Principles

CPT's ESG commitments align to the 10 United Nations Global Compact Principles which provide a framework for responsible business practices across human rights, labour, the environment and anti-corruption. These principles complement CPT's ESG commitments and guide CPT's approach to ethical conduct, sustainability and corporate responsibility.

Refer to **Appendix A** for a comprehensive mapping of CPT's policies to these principles.

Alignment to ISO14001 Environmental Management

CPT does not pursue full ISO 14001 certification given its size and operational footprint; however, the company adopts the standard's core principles as a framework for environmental management. CPT commits to legal compliance, pollution prevention, and continual improvement, integrating these considerations into business decisions in a practical and proportionate manner.

Implementation, Metrics, Reporting and Review

ESG considerations will be integrated into CPT's strategies, operations, and decision-making with full support from the Board, senior management and staff. Specifically:

- We will continue to focus on reducing energy use, waste, and travel including employee commuting.

- We will raise staff awareness about sustainability and encourage actions like reducing personal energy use and adopting eco-friendly commuting.
- We will continuously improve our ESG performance through regular monitoring, evaluation and updates based on best practices and reporting outcomes periodically to the Board. Refer to **Appendix B** for ESG Reporting Metric Principles.

Related Policies:

- Policy A1 – Code of Conduct
- Policy A3 – Work Health and Safety Policy
- Policy A4 – Privacy Policy
- Policy A5 – Bullying, Harassment and Anti-Discrimination
- Policy B8 – Hybrid Working Arrangements
- Policy B1 – Leave Policy.
- Policy C9 – Modern Slavery.

External References:

- UN Global Compact Principles
- ISO 14001 Environmental Management

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Appendix A: CPT Corporate Policies mapping to UN Global Compact Principles

The UN Global Compact Principles are derived from key international declarations including the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

Principle	Description	Relevant CPT Policy	Policy Highlights
Human Rights			
1	Support and respect internationally proclaimed human rights	A1 – Code of Conduct	Embeds respect for human rights in all operations
2	Ensure not complicit in human rights abuses	C9 – Modern Slavery Policy	Prohibits slavery and human rights abuses in supply chains
		C8 – Whistleblower Protection Policy	Enables safe reporting of unethical practices
Labour			
3	Uphold freedom of association and collective bargaining	A1 – Code of Conduct	Supports fair workplace practices
		A5 – Bullying, Harassment & Anti-Discrimination Policy	Promotes inclusive work environment
4	Eliminate forced and compulsory labour	C9 – Modern Slavery Policy	Explicit ban on forced labour
5	Abolish child labour	C9 – Modern Slavery Policy	Explicit ban on child labour
6	Eliminate discrimination in employment	A5 – Bullying, Harassment & Anti-Discrimination Policy	Zero tolerance for discrimination
Environment			
7	Precautionary approach to environmental challenges	C11 – ESG Policy	Risk-based approach to environmental impact
8	Promote greater environmental responsibility	C11 – ESG Policy	Carbon reduction, recycling, sustainable procurement
9	Encourage environmentally friendly technologies	C11 – ESG Policy	Adoption of renewable energy and green tech
Anti-Corruption			
10	Work against corruption in all forms	C10 – Third Party Risk Management Policy	Vendor due diligence and anti-bribery controls
		C12 – Anti-Bribery & Corruption Policy	Prohibits bribery, extortion, and unethical practices

Appendix B: ESG Reporting Metric Principles

The ESG Reporting Metrics will be set, measured and reviewed on an annual basis, based on the below principles.

Category	Principle
Gender representation (overall)	CPT operates in a highly specialised IT consulting market, particularly in mainframe and legacy systems, where the available talent pool is structurally male-dominated. Despite this, CPT will set realistic but progressive gender representation targets.
Gender representation (leadership)	
Age distribution <ul style="list-style-type: none"> • Under 30 • 30-50 • Over 50 	Gradually increase representation in the under-30 and 30–50 cohorts, supporting long-term sustainability of specialist skills.
Work, Health & Safety Course Completion	Target 100% completion rate
ESG Policy Awareness	Target 100% completion rate
Overall recycling rate	Minimise office waste.
Average daily power usage (kWh)	Reduce year on year energy consumption at Head Office (per staff person).