



Code of Conduct Policy – Global.

1. Overview

The Code of Conduct Policy is provided as a guiding document to employees and others in regard to the type of behaviour that is expected in the workplace and in any situation where CTM is represented in some way. These expectations are necessary to ensure that the reputation of CTM and the relationships that exist amongst employees and its between CTM and clients / providers is protected.

Expectations are drawn from CTM's core values, certain standards of conduct, policies and procedures and are described in this document to ensure both our employees and our clients are aware of our commitment to the highest professional standards by all of our people at all times.

2. Scope

The CTM Code of Conduct applies to:

- All employees of CTM, whether casual, permanent (full-time or part-time), fixed term (full-time or part-time);
- Any volunteer or unpaid worker carrying out duties in the CTM workplace;
- Regular and recurring visitors to the CTM workplace, in which there is a reasonable expectation that this Code of Conduct should be relevant; and
- Any other identified person.

3. Definitions

3.0 Core Values

All employees must understand, promote and align to CTM's underpinning core values. These values encourage and promote fair and ethical behaviours in the workplace at all times.

These values are:

Exceed to Service
Innovate to Generate
Trust to Succeed
Empowered to Achieve
Collaborate to Perform
Recognise to Reward
Play to Win

For more detail of the individual CTM values, please refer to the intranet.

3.1 Standards of Conduct

Standards of conduct are necessary in order to help employees understand the expectations the company has of them.



As a general principle, all employees are expected to apply their knowledge, skills and judgment to the best of their ability in order to bring credit to the company and to maintain effective working relationships with those for whom and with whom they work.

Additionally, every employee is required to meet the following standards:

- Provide customers / clients with the highest standard of service;
- Maintain confidentiality over customer's / client's affairs;
- Maintain the confidentiality of CTM's processes, procedures, and intellectual property;
- Ensure the security of customer / client records and the Company's working papers;
- Behave responsibly in all dealings with customers / clients;
- Act in the best interests of CTM while employed or engaged by CTM, and in a manner which upholds our brands, values, and our reputation
- Disclose any personal interest in a customer's / client's affairs;
- Disclose any interest in the affairs of our competitors, either directly or indirectly;
- Comply with all reasonable instructions or requests;
- Comply with all of CTM's policies and guidelines;
- Ensure their own dress and appearance to be of a business-like standard which promotes the image of the company;
- Maintain good relations with those people for whom and with whom you work and avoid obstructive behaviour or actions which threaten the health or safety of others;
- Avoid risking impaired judgement or injury and not attend work in an impaired condition from the use of alcohol or drugs, whether legal or illegal . You must not possess or consume illegal drugs while on duty or at any CTM workplace;
- To use CTM property in an appropriate professional manner;
- Not take advantage of your position or any information about the CTM or any of its customers or suppliers for your own personal gain, the gain of another person, or to cause harm to CTM;
- Create and support a safe work environment that aligns with CTM's commitment as an equal opportunity employer, and which does not tolerate or encourage discrimination, bullying, harassment, victimisation, is respectful of the human rights of others;
- Comply with all laws and regulations that apply to the CTM and not knowingly participate in any illegal or unethical activity

These points should be borne in mind not only whilst carrying out normal duties at the company but equally when attending social, business or training functions organised by or associated with the company, using or interacting on social media, whether in or away from the company's premises.



3.2 Standards of Honesty & Integrity

As a representative of CTM, employees are expected to maintain the highest standards of honesty and integrity both during and outside normal working hours, and to conform to the following principals:

- To be frank in dealings with others;
- Deal honestly and fairly with, and be courteous and respectful to, all of our people, our customers and our suppliers;
- To respect the property of the company and of any other person (colleague / client / customer); and
- To advise their manager of any significant error or omission in work as soon as it becomes obvious.

3.3 Standards of Professionalism

CTM's commitment to a high standard of professionalism towards all employees and clients includes CTM's commitment to consultation, maintaining privacy, fairness and transparency in processes, providing a fair process for grievances and complaints, and CTM's health and safety obligations within the workplace.

Professionalism also includes CTM's commitment to delivering on what it's management promises and carrying out our duties to the best of our ability according to our internal procedures and agreed client expectations.

3.4 Conflicts of Interest

The conceptual principles that have been considered and used when formulating CTM's Code of Conduct Policy focus on the balance in individual delivery of work duties, personal interest and client interest.

When a conflict between these interests arises, a 'conflict of interest' may be the result. Examples of such situations may include:

- The private interests of our people conflict directly or indirectly with the interests of CTM;
- Our people are involved in a business that is in competition with the CTM;
- An internal appointment being made by an individual that knows the candidate on a personal basis and did not declare this interest;
- A personal relationship being held by those people in decision making power that may result in either party receiving individual financial gain by not declaring this personal relationship;
- An employee providing in-house CTM information to another organisation that may be able to use this information for their competitive advantage, whether during or after employment with CTM, if this information is owned by CTM;
- A supervisor being involved with a staff member of which they supervise, and not declaring this personal involvement;
- Staff receiving benefits from clients and not declaring these benefits, and subsequent transactions with this client could be deemed more favourable than with other clients by whom the benefit was not received; and
- A personal relationship with a client that was not declared.



We recognise that personal relationships may exist or develop at work. If you have a personal relationship with another CTM employee or contractor that extends beyond the professional (e.g. they are a relative, spouse or you are in a relationship with them), we expect you to let your General Manager or Human Resources partner know.

This is to avoid leaving you open to allegations of conflict of interest, bias, abuse of authority or impropriety. We also expect you to maintain a professional working relationship, and never share confidential CTM information unless there is a business reason to do so.

At all times employees must declare to their General Manager or to Human Resources any situation where they believe that there may be a conflict of interest so that appropriate consideration and if required, remedial action can be taken.

3.5 Producing work of an acceptable standard

Every employee is expected to do their utmost to reach and maintain the standards of performance considered appropriate for their work, to apply their skills and knowledge conscientiously and to keep up to date in their technical or professional field.

Each employee should only do work they are competent to do.

If the employee is asked to do work with which they are not familiar, they should immediately bring that to the attention of the person delegating the work.

3.6 Public Statements

Occasionally, our people may be asked to express their views or to present, on a particular issue about CTM, for a newspaper article, television program or other publications. CTM employees are not to make public comments or official statements on behalf of CTM.

Only the Chairman of the Board, our Managing Director, Global COO, CEO's, COO's, CFO's, Company Secretary and Global Head of Marketing are authorised spokespersons for CTM, unless express approval has been obtained from the CEO or above in the relevant region.

CTM seeks to engage in regular open briefings for analyst, investor and media groups to discuss announcements to the market.

Please refer to our Media and Public Relations Guidelines and Social Media Policy.

3.7 Respect for the CTM Framework and the Law

It is a mandatory requirement of all employees that they will abide by all legislation as it applies to the workplace.

This Code of Conduct Policy is to be used in addition to and does not replace, the CTM Framework as it is described in policies and procedures such as:

- Workplace Health & Safety Policy;
- Bullying & Harassment Policy;
- Equal Opportunity & Discrimination Policy;
- Grievance Handling Procedure;
- Social Media Policy;
- Drugs and Alcohol Policy;

Version
Owner
Date Published
Next Review Due

7
Chief People Works Officer
Mar 2021
Dec 2021



- Internet & Online Communications Policy;
- Acceptance of Gifts and Benefits Policy; and
- Any other documented and implemented CTM Policies or procedures that align with supporting ethical and fair behaviour principles in the workplace.

Should an employee behave in a manner which contravenes these Standards of Conduct, disciplinary procedures and action may be initiated against the employee. Possible consequences of the disciplinary procedure and action could be an official warning for the employee, or even possibly summary dismissal of the employee depending on the severity of the behaviour.

<i>Version</i>	7
<i>Owner</i>	Chief People Works Officer
<i>Date Published</i>	Mar 2021
<i>Next Review Due</i>	Dec 2021

4. Related Documents

- Workplace Health and Safety Policy
- Workplace Bullying and Harassment Policy
- Equal Opportunity and Diversity Policy
- Grievance Handling Procedure
- Social Media Policy
- CTM Media and Public Relations Guideline
- Drug and Alcohol Policy
- Digital Communications Policy
- Acceptance of Gifts and Benefits Policy
- Securities Trading Policy