

Supplier Code of Conduct

Global

1. Introduction

1.1 At CTM, we strive to always conduct business safely, with integrity, and in line with principles outlined in this Supplier Code of Conduct (Code). CTM expects:

- its suppliers and third parties;
- members of its supply chain; and
- any third parties subcontracted by its suppliers or which otherwise support CTM's suppliers in providing goods or services to CTM;

to respect and comply with this Code, including where suppliers are providing services to or on behalf of CTM.

1.2 CTM requires its suppliers to comply with all applicable laws and regulations. For clarity, the expectations in the Code are additional to and do not in any way derogate from or override the suppliers' regulatory, legal, contractual or other obligations.

1.3 CTM's suppliers should provide this document to their own suppliers, subcontractors and third parties who support the supplier for the purposes of providing goods or services to CTM, so that these third parties understand and can comply with this Code.

1.4 CTM may review and amend this Code from time to time. CTM's suppliers must consider and adapt (as necessary) their procedures and activities where this Code is updated.

1.5 CTM's suppliers are encouraged to exceed the standards provided in the Code.

2. Safety

2.1 Safety is vital to CTM. CTM expects its suppliers to:

- (a) Comply with all workplace health and safety laws and regulations;
- (b) At all times provide and maintain a safe working environment
- (c) Implement appropriate policies and systems aimed to protect health and safety of all persons;
- (d) Appropriately assess, manage and mitigate safety risks and incidents to its personnel and any person that may be impacted by their activities; and



- (e) Keep informed of workplace health and safety legislation and update its policies and ways of working to ensure continued compliance with legislation and regulation.

2.2 Suppliers performing work at CTM sites must comply with all safety policies and requirements that CTM may reasonably request or implement.

3. Integrity

3.1 CTM expects its suppliers to act honestly and with integrity. CTM's suppliers must:

- (f) Take reasonable steps to ensure that their business and supply chain do not engage in any modern slavery practices;
- (g) In the absence of their own policy, act in a manner that is consistent with recognised international human rights;
- (h) Not support or engage in discrimination;
- (i) Take all reasonable steps to manage conflicts of interest (whether actual or perceived);
- (j) Not participate in or commit bribery, fraud, money-laundering or corruption; ensure that policies and procedures are implemented to prevent bribery, fraud, money-laundering and corruption by the business or its personnel;
- (k) Not take any actions that could result in damage to CTM's reputation;
- (l) Implement a diligent approach to confidentiality and the protection of information and data accessed in the course of its business;
- (m) Treat employees and contractors fairly and respect workers' rights and entitlements, including freedom of association and collective bargaining; and
- (n) Act, and ensure their personnel act, respectfully towards CTM employees and contractors as well as third parties when acting on behalf of CTM.

4. Data Security and Privacy

4.1 CTM recognises the importance of data protection to its clients and to the individuals with whose data it is entrusted. CTM's suppliers must share this view and in particular:

- (a) Comply with applicable privacy or data protection laws, understanding that CTM operates in multiple jurisdictions with varying data protection obligations, including in relation to the location of data;
- (b) Secure CTM data in alignment with internationally recognised standards;
- (c) Not use other parties to process CTM data unless assured of their ability to meet the requirements in this section.



5. Environment, Sustainability, Culture and Reporting

5.1 CTM aims to support the environment and welfare of communities. CTM's suppliers must:

- (a) Seek to consider and improve environmental and sustainability outcomes;
- (b) Keep informed and comply with any applicable environmental and sustainability laws and regulations;
- (c) Be aware of and respect Indigenous communities and cultural heritage in line with; and
- (d) Provide updates and/or reporting on relevant business activities, progress, risks and compliance as they relate to the supply of goods or services to CTM.

6. Human Rights

6.1 CTM suppliers are expected to provide goods and services in a manner consistent with the United Nations Universal Declaration of Human Rights and related human rights obligations.

6.2 Consistent with relevant modern slavery legislation, suppliers are expected to proactively identify, address, mitigate and (where required by legislation or by contract) report on risks of modern slavery practices (defined broadly to include all forms of human trafficking, forced labour, child labour and slavery-like practices) in their business operations and supply chains.

7. Management

7.1 CTM's suppliers must use reasonable efforts to ensure that their suppliers comply with this Code. CTM's suppliers should ensure that their systems and policies are sufficient to comply with this Code.

7.2 CTM has the right to review its suppliers' procedures and policies related to compliance with this Code. CTM's suppliers agree to cooperate with CTM where CTM seeks to assess the relevant supplier's compliance with this Code, including providing any relevant information reasonably requested by CTM.

8. Concerns and Breaches of this Code

8.1 CTM's suppliers must notify CTM if there is any suspected or actual non-compliance with this Code.

8.2 Any such notifications or other concerns relating to this Code may be directed to CTM's eligible recipients and/or Whistleblower Protection Officers via a report under CTM's Whistleblower Policy.



8.3 CTM's Whistleblower Policy can be found on CTM's website [here](#).

9. Review and Ownership

- 9.1 Queries regarding this Code should be directed to the Company Secretary.
- 9.2 This Code will be reviewed every two years to ensure it is operating effectively and remains relevant to the current needs of CTM.
- 9.3 This Code has been approved by the Board.



Version	2
Owner	Company Secretary
Approval Date	March 2026
Approval Authority	Board
Next Review Date	March 2028