



TECHNOLOGY & INFRASTRUCTURE



Supplier  
Code of Conduct  
2025



## GENERAL OBLIGATIONS & APPLICATION

At CPS, we take great pride in maintaining the highest standards of integrity, and we strive to cultivate relationships with customers and suppliers that are ethical, transparent, and inclusive. This Supplier Code of Conduct (Code) outlines the minimum ethical standards and inclusive behaviours we expect from our Suppliers (and their sub suppliers) when they enter into commercial agreements with CPS.

Our goal is to partner with organizations that share our dedication to these ethical practices, ensuring that their actions, operations, and commercial relationships positively impact our communities and people. We expect our Suppliers to fully adhere to and meet the requirements of this Code and to further communicate these standards to sub suppliers involved in delivering goods or services to CPS.

Critical to this Code, is the expectation that all Suppliers operate with full compliance to the Laws, regulations, and obligations of the jurisdictions to where they do business. The obligations and requirements set out in this Code are not considered substitutes for any applicable law, nor do they amend, nor replace any contractual obligations between Suppliers and CPS.

We encourage all Suppliers to establish and enforce their own Code of Conduct throughout their supply chains. Should a Supplier be unable to meet the requirements outlined in this Code, we expect them to proactively engage with the CPS to address and resolve these concerns.



## 1. Human Rights and Labour Practices

CPS is dedicated to fostering a workplace that upholds human rights, equality, and diversity, as we believe every individual deserves the right to live their lives autonomously, safely and with respect. Our Suppliers are expected to ensure that they respect all local, national and relevant international laws with regards to the human rights of people, employment practises, anti-discrimination, and modern slavery, are upheld in the areas that they operate their business.

### a. Modern Slavery

Modern slavery is the serious exploitation of people, including forced labour, debt bondage, human trafficking and slavery, which undermines or deprives them of their freedom. We expect that our Suppliers will:

- Ensure compliance with all Australian Laws and respects the fundamentals of the International Labour Organisation (ILO) with regards to the minimum hiring age of employees and sub suppliers.
- Not employ child labour that deprives children of dignity, disrupts their childhood, or denies them access to education and opportunities.
- Ensure all employment is freely chosen, and no form of forced labour, (including debt bonded), or indentured labour, slavery and human trafficking shall be used.
- Manage all aspects of their supply chain to reduce and remove risks of modern slavery as per the *Modern Slavery Act 2018 (Cth)*.

### b. Labour Practices

- Employees should have unrestricted freedom of movement, including the ability to enter and exit any company facilities without unreasonable limitations.
- Uphold the rights of workers and employees to freely associate, whether by joining or not joining any organization of their choosing and support their right to engage in collective bargaining.
- Compensation paid to all employees and sub suppliers, must adhere to all applicable wage laws, including minimum wage, overtime pay, and legally mandated benefits.
- All necessary measures have been taken to ensure a workplace that is free from harassment and any form of discrimination based on age, gender, race, ethnic origin, disability, nationality, marital or relationship status, sex, sexual orientation, and gender identity.
- Promote a culture of diversity and inclusion in their business operations and supply chain.



## c. Communities

We regard our Suppliers as an integral part of the CPS Organisation and encourage their support for local communities. While conducting business for or on behalf of CPS, we expect our Suppliers to:

- be conscious of cultural heritage and traditions of Indigenous communities and ensure all communication is conducted with respect.
- will conduct services in a way to be respectful to and have a positive impact on local communities and;
- to take reasonable steps to promote local businesses in their supply chain.

## 2. Ethics

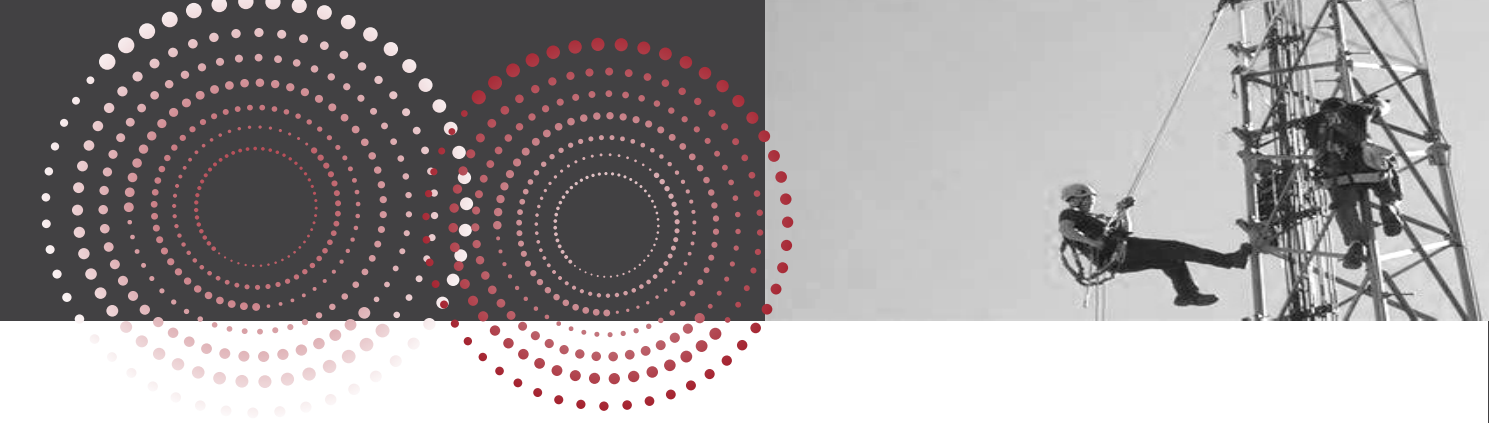
CPS holds its Suppliers to the highest ethical standards in every aspect of their business, including relationships, operations, and procurement, regardless of where goods or services are provided. We expect our Suppliers to:

- Maintain a zero-tolerance policy towards any form of bribery, corruption, extortion, or embezzlement, including bribing or attempting to bribe a government employee or official.
- Take appropriate steps to identify and mitigate conflicts of interest, including appropriately recording conflicts of interest.
- Use CPS Intellectual Property strictly as contracted and not share it with any other party unless explicitly permitted in writing.
- Conduct all business transactions fairly and transparently.
- Ensure the highest degree of compliance with confidentiality and privacy for all CPS and CPS customer confidential information obtained or accessed through the course of any commercial agreement.

## 3. Information Security

At CPS, we prioritize privacy and security. We require our Suppliers to safeguard our technology systems, data, networks, and personal information pertaining to our customers and employees. Suppliers are expected to:

- Implement policies, operations and security measures that meet or exceed the commitments we make in our Privacy Policy and ensure compliance with all relevant legislation, standards and regulations, including the Australian Privacy Principles.
- Suppliers must also comply with any specific privacy or data security obligations you owe to us contractually.
- All risks to, or actual or suspected breaches of, information security or privacy obligations must be reported to us immediately.



## 4. Work, Health and Safety

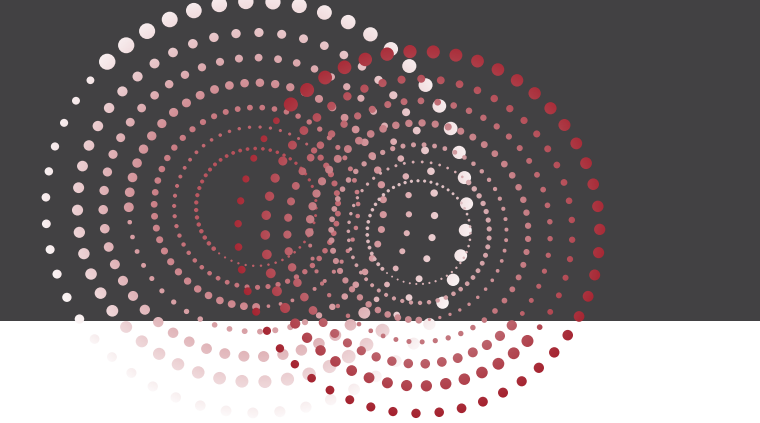
CPS acknowledges the vital importance of offering a safe and healthy work environment for all employees, workers, visitors, Suppliers, and sub suppliers. We are committed to adhering to the Model Work Health and Safety Legislation and Regulations, as well as the Safe Work Australia Codes of Practice. Our objective is to prevent all workplace injuries and illnesses.

We expect all our Suppliers to ensure that, in addition to their contractual obligations they will:

- Ensure all business premises, locations and office environments are free of hazard, are safe for all employees, workers and sub suppliers.
- Ensure all employees, workers and sub suppliers are competent and hold the relevant qualifications and licenses to perform services.
- All services comply with all applicable health and safety laws and regulations.
- Employees, and workers are prohibited from consuming or possessing alcohol or drugs in the workplace or attending work under the influence of alcohol or drugs.
- Ensure they hold an effective health and safety management system.
- Ensure all safety incidents and accidents are recorded and appropriately addressed to ensure a safe workplace.
- Take appropriate action for any breach of health and safety obligations.
- Provide up to date and effective training all workers and sub suppliers regarding work, health and safety law and obligations.
- Fulfil all requirements set out in CPS work, health and safety policy whilst performing services on behalf of CPS at any customer site.
- Ensure all workers wear and show Personal Protective Equipment where required; and
- Allow workers to raise concerns and not work in unsafe conditions and where necessary take appropriate action to remedy.

## 5. Environment

CPS offers project management services to major telecommunications providers across Australia, adhering to contractual agreements. In managing these services, CPS is dedicated to achieving environmental excellence and is committed to meeting environmental standards based on the requirements of ISO 14001:2015. We comply with the respective Environmental Legislation in the states in which it operates, such as the NSW Protection of the Environment Operations Act 1997 No 156 and the QLD Environmental Protection and Other Acts Amendment Act 2011.



We expect our Suppliers to:

- strive to implement a detailed management action plan in the event of an environmental accident (e.g. chemical spillage or EME leakage).
- seek to develop energy and resource saving work methods.
- maintain knowledge of and compliance with relevant environmental legislation and regulations.
- adhere to Waste Minimisation and Management legislation (as applicable).
- seek to reduce greenhouse gas emissions by improving energy efficiency or use of renewable energy; and
- promote efficient and sustainable use of resources, including energy, water and reducing waste to land.

## 6. Business Continuity Planning

Suppliers must be prepared for any disruptions to their operations or business, such as natural disasters, terrorism, pandemics, and software viruses etc. This includes having a comprehensive and verified business continuity and disaster recovery plan to protect workers, employees, and sub suppliers

## 7. Grievance

Compliance with the principals contained within this Code, will be a factor in determining whether CPS enters into a commercial agreement with a Supplier. CPS will periodically audit Supplier compliance with this Code, and where any non-compliance is identified, we expect Suppliers to provide corrective action plans within a reasonable timeframe.

CPS may cease to do business with any Supplier found to have behaved unethically or illegally and who may persistently fail to meet the obligations under this Code.

If any Supplier, or sub supplier at any time has any concerns regarding unethical behaviour, or non-compliance to this Code, they may report it to CPS using our Whistleblower email:

[whistleblower@cpstech.com.au](mailto:whistleblower@cpstech.com.au)



# THANK YOU

We look forward to working with you.

