



Code of Conduct

The guide to our values, policies, requirements and expectations



July 2014

Message from the Chairman

To all CTI employees, contractors and other business partners

The Board of Directors and senior management of CTI Logistics Limited and controlled entities (CTI) are committed to ensuring that the Company and its employees maintain the highest ethical standards and integrity at a personal and corporate level.

CTI has adopted this Code of Conduct to provide a set of guiding principles, practices and standards of behaviour which are to be observed by all CTI employees, contractors and business partners. The Code underlines the value that the Directors place in CTI's corporate image and culture. The Board will keep the Code of Conduct under review to ensure it continues to reflect CTI's corporate values and culture, and the expectations of Employees and the community.

The Code provides guidelines on principles, practices and standards of behaviour. It also serves as a ready reference for some Company procedures. All Employees and Contractors are expected at all times to act consistently with the principles set out in this Code and in the best interests of the Company.



David Watson
Executive Chairman
CTI Logistics Limited

29 July 2014

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Structure of the Code of Conduct

This document contains a summary of the key elements that collectively comprise the CTI Code of Conduct.

For ease of reference the Code has been grouped under the following headings:

- Compliance with the Code
- Corporate
- Employees and the Workplace
- Protecting Assets, Resources and Information
- Information Technology & Communications Systems
- Chain of Responsibility

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1 COMPLIANCE WITH THE CODE

1.1 Definitions

For the purposes of this document the following definitions apply;

Code	CTI Code of Conduct, comprising this document and all policies, plans and procedures referenced herein.
Contractors	Reference to Contractors shall encompass all contractors and suppliers including independent contractors or carriers, also known as sub-contractors or owner-drivers.
Board	The Board of Directors of CTI Logistics Limited. A current list of the Directors of CTI may be found on the Company's website www.ctilogistics.com
Company	CTI Logistics Limited (ABN 69 008 778 925) and controlled entities.
Company Secretary	Details of CTI's Company Secretary may be found on the Company's website www.ctilogistics.com
CTI or CTI Logistics	CTI Logistics Limited (ABN 69 008 778 925) and controlled entities.
Directors	Members of the CTI Logistics Limited Board of Directors. A current list of the Directors of CTI may be found on the Company's website www.ctilogistics.com
Employees	This term includes all direct CTI employees, whether full-time, part-time or casual, as well as third party labour hire personnel working directly for CTI.
Executive Committee	CTI's executive management steering committee. A current list of the members of the Executive Committee may be found on the CTI intranet intranet.ctilogistics.com
IMS	Integrated Management System. CTI's central document repository, covering Corporate, Quality Assurance, Occupational Safety and Health, Environmental, Human Resources, and Operational policies, procedures and supporting documents.

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1.2 Introduction

This Code defines the standards of personal and corporate conduct and behaviour that is expected of all CTI Directors, Employees, Contractors, suppliers and business partners.

The Code does not and cannot cover every possible situation that we may face, nor describe every law, policy or standard with which we need to comply. Rather, it provides a framework that we should use for making practical, lawful and ethical decisions that protect the interest of CTI, its Employees, Contractors and stakeholders.

Where a provision of the Code may be interpreted as differing from applicable laws, standards or policies, we must comply with those laws, standards and policies. However, where the Code sets a higher standard it is expected that we will follow the Code.

All policies and procedures referenced throughout this document may be found on the CTI intranet site intranet.ctilogistics.com. Core corporate policies are also available on the CTI web site www.ctilogistics.com.

1.3 Obligations for Compliance

Everyone who works for or with CTI including Directors, Employees, Contractors, suppliers and business partners are expected to comply with the Code.

You must take all reasonable steps to ensure that Employees, Contractors, suppliers and any other parties under your supervision or direction with whom we do business are aware of and comply with the Code.

Directors, managers and supervisors are responsible for ensuring that they promote an environment which encourages ethical and lawful behaviour and compliance with the Code at all times.

As this document and associated policies and procedures may be updated from time to time, please refer to the CTI intranet intranet.ctilogistics.com for the most current version.

1.4 Expectations of Employees

Employees are expected to:

- Work diligently; act in good faith and in the best interests of the Company
- Act honestly, comply with all applicable local, national and international laws

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- Promote and protect the business, reputation, values and general interests of the Company
- Assist the Company in operating ethically, complying with the law, upholding corporate values and avoiding conflicts of interest
- Approach all work in ways that minimise environmental impacts and maximise workplace safety
- Display fairness, courtesy, respect, consideration, sensitivity and discretion in all dealings within the workplace and with customers, suppliers and the community
- Avoid any form of discrimination, bullying, harassment or other inappropriate workplace behaviour, and take action to prevent or stop these behaviours if demonstrated by others
- Comply with all applicable Company policies and procedures
- Protect company assets, resources and information
- Report any suspected wrongdoings or breaches of the Code

1.5 Responsibilities of Those who Supervise Others

Supervisors and managers have a responsibility to ensure that all the people for whom they are responsible:

- Are aware of and comply with the provisions of the Code
- Understand their roles, responsibilities and entitlements as defined in the Code
- Are able to access CTI policies and procedures and other relevant documentation via the intranet, internet, or by access to printed versions
- Understand their responsibilities, authorities and entitlements as defined in CTI's policies and procedures

Supervisors and managers must also:

- Conduct themselves and their dealings with others to the highest possible standards consistent with the requirements of the Code
- Respond promptly and seriously to Employees' and Contractors' legitimate concerns and questions about matters of business conduct or possible breaches of the provisions of the Code

1.6 Breaches of the Code

This Code has the full support of the Board and we take compliance with the Code seriously.

If you breach this Code you may face disciplinary action, including termination of your employment or contract. If the matter involves a breach of law or other regulation, the matter may also be referred to an appropriate law enforcement authority.

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1.7 Raising a Concern about Business Conduct

Raising a concern about business conduct ultimately protects CTI, its Employees and other stakeholders. If you think a decision, action or practice is unethical, or in breach of the Code or other CTI policies, or a breach of the law, you have the right and an obligation to raise that concern.

You should immediately raise this with your supervisor or manager who will help you create a report.

If your supervisor or manager is unavailable or involved in the breach or potential breach, you should refer this to your Human Resources contact person or his/her manager. You may also contact a member of the Executive Committee if you:

- Believe the breach or potential breach is serious
- Have concerns about making a report
- Are not satisfied with the response to your report

You will not face any consequences if you report a breach or potential breach in good faith as long as your report is genuine. It is important we have a culture where we can raise and discuss ethical concerns freely and openly without fear of reprisal.

We will do what we can to keep the details of your report confidential and protect your identity. However, in some cases, we may need to disclose your identity and other information in order to fully investigate the report.

CTI prohibits any form of punishment, disciplinary or retaliatory action being taken against anyone for raising or helping to address a genuine business conduct concern.

Refer to *PRC-0054 Raising a Concern about Business Conduct* for more information.

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2 CORPORATE

2.1 Corporate Governance Statement (extract)

The Australian Securities Exchange Corporate Governance Council has published a number of principles and best practice recommendations relating to the direction and management of companies. These guidelines form a corporate governance framework intended to provide a practical guide for listed companies and their investors.

The Company's Directors are fully cognisant of the Corporate Governance Principles and Best Practice Recommendations published by the ASX Corporate Governance Council ("CGC") and have adopted those recommendations where they are appropriate to the Company's circumstances.

Refer to *POL-0029 Corporate Governance Statement* for more information.

2.2 Corporate Policies

Key Corporate Policies and Statements are posted on the CTI website www.ctilogistics.com. These include:

- Anti-Bribery and Anti-Corruption Policy
- Audit Committee Charter
- Business Conduct and Ethics Policy
- Securities Trading Policy

2.3 Corporate Social Responsibilities

CTI recognises that our social, environmental and ethical conduct has a direct impact on our reputation in the marketplace and how we are viewed by our Employees.

We are committed to advancing policies and systems across our Company to ensure we monitor all aspects of our Corporate Social Responsibility as it pertains to our business, specifically good ethical behaviour, concern for Employees' health and safety, and care for the environment and the community.

We respect the basic rights of the people we deal with and will not engage in activities that encourage human rights abuses. We do not employ or condone forced, bonded or child labour.

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2.4 Ethics

CTI expects all of its business to be conducted in compliance with high ethical standards of business practice. We apply these standards to all our dealings with Employees, customers, suppliers, legal authorities and other stakeholders.

CTI is committed to competing fairly in all markets in which we operate, and to complying with all applicable competition laws and guidelines.

CTI expects all our dealings with customers and consumers to be conducted in good faith and with integrity, and to comply with all applicable consumer and fair trading laws in all jurisdictions in which we operate, and in particular our obligations under Australian Consumer Law.

As a listed company on the Australian Stock Exchange, CTI adheres to the Australian Securities Exchange Corporate Governance Council's Principles and Best Practice Recommendations.

2.5 Bribery and Corruption

CTI recognises that our reputation for conducting business in an ethical and honest way is a core company value that must be valued and protected.

The Board of CTI has endorsed the CTI Anti-Bribery and Anti-Corruption Policy, covering the areas of:

- Bribery and corruption
- Receiving gifts, entertainment and favours
- Giving gifts, entertainment and favours
- Facilitation payments
- Political contributions and charitable contributions

CTI has a "zero-tolerance" approach to acts of bribery and corruption by any of our Employees or Contractors. As well as being morally wrong, bribery and corruption are criminal offences that expose CTI and individuals to the risk of prosecution, fines and imprisonment.

You must notify your manager or a member of CTI's Executive Committee as soon as possible if you believe or suspect that a conflict with or a breach of the Anti-Bribery and Anti-Corruption policy has occurred or may occur in the future.

Refer to *POL-0028 Anti-Bribery and Anti-Corruption Policy* for more information.

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2.6 Environment

CTI is committed to minimising the impact of its business activities on the environment.

The Board of CTI is accountable for overall environmental compliance and performance. This includes providing guidance and necessary resources and support to ensure that CTI's business activities are undertaken in a manner that at all times considers and effectively manages potential environmental risks.

CTI's individual business managers and supervisors are responsible for implementing CTI's environmental policies and guidelines. They are entrusted to proactively address issues that may adversely affect environmental performance within their business. This includes assessing likely environmental outcomes before decisions to proceed with activities and considering environmental outcomes when making decisions in the same way that consideration is given to safety, cost, quality and time.

Refer to *POL-0008 Environmental Policy* for more information.

2.7 Quality

CTI is committed to being at the forefront of quality management.

CTI quality objectives will be met by:

- Thoroughly understanding the needs and requirements of our customers
- Developing and empowering our Employees to do what is needed to satisfy and exceed our customers' expectations
- Striving to continuously improve our processes based on measurable objectives

In order to achieve quality outcomes, CTI has a quality management system designed in accordance with the international standard ISO9001. This is implemented via quality management plans applicable to each of our various operational divisions.

CTI's individual business managers and supervisors are responsible for the management and implementation of CTI's quality management system within their business unit, and for cultivating a culture of continuous improvement within CTI.

Refer to *POL-0007 Quality Policy*, *REF-0006 Introduction to Quality Assurance* and business unit specific variations of *PLA-0005 Quality Plan* for more information.

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2.8 Community Support

CTI has its own charitable foundation, The CTI Logistics Foundation. The Foundation's committee is made up of Employees. Over the years the Foundation has supported many charities and specific disaster causes. We are extremely proud of the support that we have provided Princess Margaret Hospital, where we have supplied medical equipment.

CTI is also a previous State winner of the Prime Minister's Employer of the Year Award for participating in a back to work program for disabled people wanting to return to the workplace after injury.

2.9 Work Environment

CTI predominantly provides services to the marketplace, which means we are only as good as the people we employ. We aim to find and keep the highest calibre of Employees and encourage their contribution and personal development.

Our goal is to provide an environment that fosters collaboration and work practices that will drive our Company forward.

Employees are provided with ongoing learning and development opportunities to fulfil their potential. CTI's policy is always to try and promote from within when the opportunity arises.

CTI is committed to providing an inclusive work environment with equal opportunities for all current and prospective Employees, Contractors, customers and suppliers and does not condone harassment, intimidation or unlawful discrimination of any kind.

CTI will not tolerate sexual advances, bullying, hostility, abusive language, physical violence or the threat of physical violence.

Refer to *POL-0005 Social Responsibility Statement* for more information.

2.10 Diversity and Discrimination

CTI is committed to diversity and equality in all areas and all levels of its operations. Diversity means those attributes which may differ from person to person, including gender, age, ethnicity and cultural background.

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CTI recognises that the strength of the business is built on the understanding of individual strengths and differences and seeks to respect these.

There are many areas in which people experience discrimination and CTI will continue to work towards an anti-discriminatory environment, based on open discussions with Employees, Contractors, customers, suppliers and others on perceptions of discrimination and by ensuring that our practices reflect relevant legislation and good practice.

CTI is committed to providing an equal opportunity to all existing and prospective Employees without discrimination based on religion, disability, gender, age, marital status, sexual orientation, race or ethnicity.

Refer to *POL-0004 Diversity Policy* for more information.

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3 EMPLOYEES AND THE WORKPLACE

3.1 Occupational Safety and Health

The provision of a safe working environment for Employees is a non-negotiable priority. CTI is committed to eliminating workplace injuries and illness, and providing a safe and healthy environment for Employees, Contractors, and visitors.

We work to promote a culture where personal responsibility for safety and health is second nature. Employees are required to identify and report any potential risk hazards. All reports receive immediate assessment and action at site level or may be elevated through the appropriate management chain up to Director level for issues of a more serious nature.

OS&H is a permanent item on our Board of Directors' meeting agenda. CTI complies with all relevant statutory safety and health legislation.

Refer to *POL-0009 CTI Occupational Safety & Health Policy* for more information.

3.2 Fatigue Management

Fatigue is an ongoing acute state of tiredness leading to mental or physical exhaustion and prevents people from functioning within normal boundaries. Fatigue is more than feeling tired or drowsy, it is a physical condition that can occur when a person's physical or mental limits are reached.

Managers, supervisors and individuals all share a responsibility to ensure that fatigue does not impact on the health or safety of themselves or others, and to minimise and manage the adverse effects of fatigue in the workplace.

CTI has identified that Employees and Contractors falling under one of the following categories are at an enhanced risk in relation to fatigue in the workplace;

- Shift workers
- Commercial vehicle drivers

CTI recognises that shift workers can be one of the main worker groups susceptible to fatigue, due to disruption to a body's natural body clock rhythm. Sleep disruption is a common problem for shift workers.

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CTI has identified that commercial vehicle drivers are a potentially high risk group in relation to fatigue in the workplace. In order to minimise the risks of fatigue among commercial vehicle drivers, CTI has:

- Implemented a Fatigue Management Plan for all CTI commercial vehicle drivers
- Compiled a CTI Journey Management Procedure that defines the procedures to be followed for every journey of over 400kms distance or 5 hours duration
- Prescribed that a Journey Management Plan must be set up for every journey of over 400kms distance or 5 hours duration

CTI has established Fatigue Management Plans to ensure Employees and Contractors are fit for duty in an effort to prevent or minimise the effects caused by fatigue related incidents.

Refer to *POL-0022 CTI Fatigue Management Policy* for more information.

3.3 Alcohol and Drugs

CTI is committed to providing a safe and healthy working environment for all Employees, Contractors and visitors by eliminating hazards associated with the inappropriate use of alcohol and other drugs (including prescription and over the counter medications).

It is a requirement that all Employees and Contractors are not affected by alcohol or drugs during working hours. This policy applies to all CTI Employees, Contractors and visitors working for or on behalf of CTI or attending a CTI site.

Where an Employee or Contractor is taking medication, or is suffering from any condition that may affect or limit their ability to carry out work, they are to advise their supervisor.

Any Employee, Contractor or visitor may be required to undertake random, blanket or “for cause” drug and alcohol testing.

Where an Employee or Contractor returns a positive test or fails to undertake a test he/she will be suspended without pay until such time as deemed fit for work or their employment or contract is terminated. Where there is a positive test result any subsequent tests to determine fitness for work will be at the person’s own expense.

CTI recognises that alcohol and drug abuse are medical problems that can be treated. We will help any of our Employees or Contractors who want to overcome these problems.

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Refer to *POL-0011 CTI Alcohol & Other Drugs Policy* and *PRC-0024 CTI Drug and Alcohol Testing Procedure* for more information.

3.4 Vehicle Standards

In setting vehicle standards CTI seeks to maximise safety and minimise environmental impact.

CTI uses a combination of handheld and/or in-vehicle monitoring systems equipped with GPS tracking for monitoring and communications purposes for vehicles engaged within one of CTI's transport fleets.

CTI aims to use fuels as efficiently as possible, and to work towards all vehicles in our fleet being fitted with the latest emission reduction technologies.

All vehicles must be kept clean and in good mechanical repair at all times.

All vehicles should be sign-written with the appropriate CTI logo. Vehicles may not carry any signage that may cause offence to the public.

Refer to *POL-0006 CTI Energy Consumption Policy* and *POL-0008 CTI Environmental Policy* for more information.

3.5 Traffic Precautions

Employees, Contractors and visitors to a CTI site must comply with CTI's traffic management plan for that site. Drive slowly and watch out for other vehicles, loading and unloading activities, and pedestrians.

Pedestrians must stay within the marked lanes and keep away from operating machinery, and loading and unloading activities.

3.6 Manual Handling

CTI is committed to reducing the incidence of manual handling injuries. Supervisors, Employees and Contractors must:

- Identify and assess the risk factors associated with any manual handling tasks
- Observe all instructions and directions that relate to control measures to reduce manual handling risks
- Attend any manual handling training that is supplied by CTI
- Ensure that they are familiar with the use of available manual handling devices

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- Report any unsafe practices/equipment or injuries sustained performing manual handling tasks

Refer to *FRM-0052 Manual Tasks Risk Assessment Form* for more information.

3.7 Authority to Operate Plant and Equipment

Only persons who are trained by CTI or hold a relevant certificate of competency or licence and are authorised by CTI are permitted to operate any plant and equipment, vehicle, forklift or other materials handling equipment on any CTI site, or elsewhere on behalf of the Company. This restriction applies to all Employees, Contractors and visitors.

3.8 Workers Compensation and Injury Management

CTI is committed to assisting injured workers to return to work as soon as medically appropriate following a work related incident.

CTI has a Workers Compensation and Injury Management Policy and procedures to support any CTI Employee that has a work related injury or illness.

Management supports the injury management process and recognises that success relies on the active participation and cooperation of the injured worker. Whenever possible, suitable duties will be arranged, having regard for the injured worker's medical restrictions.

CTI believes that it is normal practice following a work related injury for Employees to return to meaningful, productive employment at the earliest possible time.

CTI's workers' compensation insurance provides injured workers with payments to cover loss of earning capacity and payment of reasonable medical and vocational rehabilitation expenses, where necessary, to assist them to remain in or return to gainful employment.

Refer to *POL-0017 CTI Workers Compensation and Injury Management Policy* for more information.

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3.9 Uniforms

The majority of CTI Employees and Contractors are provided with uniforms to provide identification for the security of customers and to enhance the image and reputation of CTI, as well as incorporating high-visibility panels as an aid to the safety of the Employee or Contractor.

If you are provided with a uniform, you are to:

- Wear the uniforms you have been issued with at all times whilst performing duties for or on behalf of CTI.
- Ensure that the appropriate CTI logo is clearly displayed on uniforms and clothing.
- Keep your uniform in an “as new” clean and neat condition.

3.10 Personal Protective Equipment

As part of CTI’s hazard management procedures, Employees, Contractors and visitors to CTI sites must wear Personal Protective Equipment (PPE) where required. CTI has written procedures that define when and where Employees, Contractors or visitors to any CTI sites should use PPE and what types of PPE should be used.

CTI also provides training and instruction in the use and maintenance of PPE to ensure Employees receive the desired level of protection from the equipment.

Employees and their supervisors must ensure that PPE is maintained in a condition that ensures its continued effective use. Damaged or defective PPE should be discarded or repaired according to the manufacturer’s specifications.

Refer to *POL-0019 CTI Personal Protective Equipment Policy* for more information.

3.11 Housekeeping

Poor housekeeping is a contributing factor to accidents in the workplace. In order to minimize the risk of accidents, all Employees must keep their workplace/site clean, neat and tidy at all times, regularly dispose of waste, remove objects which could cause injury, keep walkways clear for safe movement of materials and people, and keep firefighting and emergency equipment unobstructed and ready for use.

Supervisors and managers are required to ensure that all workplaces/sites have adequate lighting, that there are an adequate number of waste containers, and that there are appropriate storage areas for goods and materials.

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3.12 Smoke Free Workplace

CTI is committed to providing a safe and healthy working environment for all Employees, Contractors and visitors. Concern over the effects of smoking and passive smoking has led CTI to implement a smoke-free workplace policy in order to limit Employee exposure to environmental tobacco smoke and to ensure risks to all Employees are minimised.

Smoking is strictly prohibited in the following places and/or situations:

- Company owned vehicles
- Privately owned vehicles conducting company business where a CTI Employee or Contractor is in the vehicle with the vehicle owner or where the vehicle is on Company premises
- Company premises (excluding designated smoking areas where provided)
- CTI clients' premises (excluding designated smoking areas where provided)
- During work-time. Additional breaks for smoking are not permitted

This policy applies to all CTI Employees, Contractors and visitors.

See *POL-0010 CTI Smoke Free Workplace Policy* on the CTI intranet site for more details.

3.13 Mobile Phones and Other Devices

CTI has policies that provide directions for the use of the various types of mobile devices (phones, PDA's, iPads etc.) that are used for voice and data transfers:

- Mobile devices are issued to Employees and Contractors on a needs basis for business use only. CTI reserves the right to be reimbursed for any personal or excessive use
- Only authorised personnel are permitted to use a mobile device at any work site where mobile plant, machinery and trucks are in operation and may only do so when in a safe position away from the operating plant/vehicles
- Mobile devices are not to be used for unlawful or unacceptable practices such as bullying, harassment, discrimination, or anything in breach of CTI's Diversity Policy
- All mobile devices issued to Employees and Contractors must be maintained in good order. You must advise your manager or supervisor of any damage to or faults with your mobile device. Your mobile devices and all accessories, including chargers, must be returned to your manager when you leave employment with CTI

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- Use of personal mobile phones during work time should be minimised and must not interfere with work practices or other workers' concentration
- Use of mobile devices while driving shall comply with the WA Road Traffic Code (and any other relevant Australian State or Federal legislation)

Refer to *POL-0012 CTI Mobile Phones and Other Devices Policy* and *POL-0013 CTI Information Systems Security and Acceptable Use Policy* for more information.

3.14 Personal Phone Calls

CTI recognises that some level of personal phone calls is unavoidable. We simply ask that Employees keep the number and duration of personal calls to a minimum.

3.15 Radio, Television, and personal audio devices (iPod's and similar)

The use of radio, television, and personal audio devices during normal work time is not permitted on CTI sites, unless specifically authorised by a member of the Executive Committee.

This includes listening to radio or music on mobile devices with headphones or earpieces, as the use of headphones in a work environment may impair your ability to hear and respond to a potential safety hazard or incident.

3.16 Sickness Reporting

CTI policy is that if an Employee is sick and as a result is unable to come to work, the Employee must inform his/her supervisor of his/her absence as soon as is practicable. It is not acceptable to inform or leave a message with a co-worker. To ensure payment for sick leave, a medical certificate is required if the Employee is sick for two or more consecutive days or if the absence is on a day immediately before or after a weekend, public holiday or period of annual leave.

3.17 Customer Service

All CTI Employees and Contractors are to ensure that our customers and our customers' customers are treated with the utmost respect and courtesy at all times.

Respond with courtesy to any complaints or issues raised by customers or anyone else, including the general public, by trying to resolve the issue immediately and/or politely advising that the matter will be reported to CTI management for immediate action and/or response. Any such issue must be promptly reported to CTI management.

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3.18 Personal Presentation

CTI Employees and Contractors shall present themselves in a well-groomed, clean and tidy manner with a high standard of personal hygiene at all times while on a CTI site or performing duties on behalf of CTI.

3.19 Driver Behaviour

“Driver” refers to CTI Employees who are employed to drive a Company owned vehicle or who drives a Company owned vehicle as a part of their job, and to Contractors who undertake delivery or driving related duties for CTI.

As a Driver you are required to:

- Comply with all laws in the conduct of your activities as a Driver
- Hold a current driver’s licence applicable to the class of vehicle being driven. Any suspension or cancellation of such licence will be deemed as an inability for you to perform your work
- If engaged in delivery services, promptly undertake each of your delivery services in conformity with the standards of best industry practice
- Wear the uniforms you have been issued with at all times (additional clothing may be worn provided it does not carry identification or the logo of another transport company or organisation)
- If you have been issued with an ID badge, carry it with you at all times

Drivers shall at all times act with respect towards other Employees, Contractors, customers, and other road users. Aggressive and/or offensive behaviour will not be tolerated.

Refer to *POL-0020 CTI Company Driver Behaviour Policy* and/or *POL-0021 Independent Carrier Behaviour Policy* for more information.

3.20 External Communications

Employees, including management, are not to communicate with the media on behalf of CTI. Only the Company Secretary or an officially designated Disclosure Officer are authorised to speak or disclose information on behalf of CTI.

Refer to *POL-0032 Continuous Disclosure Policy* for more information.

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4 PROTECTING ASSETS, RESOURCES AND INFORMATION

4.1 Personal Information and Privacy

CTI is committed to maintain the confidentiality and security of information that is obtained in CTI's dealings with Employees, Contractors, customers, suppliers and other third parties.

This information may include personal, technical, strategic or financial information, commercial arrangements or intellectual property:

- Such information must be kept confidential and must be used solely for the purpose for which it is intended
- CTI Employees must not disclose this information to anyone other than those who need to know this information in order to perform their work
- CTI Employees must not use or misuse this information to obtain a personal benefit or to benefit another person
- This information must be kept secure and stored in a manner that provides an appropriate level of security
- You must protect this information even after you leave CTI

Employees are required to comply with the requirements of the Privacy Amendment (Enhanced Privacy Protection) Act 2012, which defines 13 Australian Privacy Principles (APP's), as outlined in CTI's Privacy Policy *POL-0018*.

If you have any queries in relation to CTI's privacy obligations or wish to ask about the privacy of any of your personal information, contact the CTI Company Secretary who is the designated Privacy Officer.

Refer to *POL-0015 CTI Personal Information and Privacy Policy* and *POL-0018 Privacy Policy* for more information.

4.2 Document Control

Controlled Documents include Policies, Procedures and Forms. All Controlled Documents are stored electronically and can be accessed on CTI's intranet. Depending on access protocols, users can download and print Controlled Documents. Once printed it is an Uncontrolled Document. "Uncontrolled" means that there is no formal procedure for managing any updates to that copy.

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All new or revised Controlled Documents must be reviewed and approved by the IMS Management Committee, who are responsible for the integrity of CTI's documentation, prior to being included in the IMS system. A current list of the members of the IMS Management Committee can be found on the CTI intranet intranet.ctilogistics.com

Any CTI staff member can initiate a change to a Controlled Document or identify the need for a new Policy, Procedure or Form that relates to their area of responsibility.

The CSIR form and procedures are used to lodge requests for changes or for new documents as per *PRC-0010 CSIRs*. These requests must be submitted to the Manager of the relevant section or their delegate for review.

The Manager (or delegate thereof) of the relevant section will review the request and if necessary, draft the changes or new documents and submit them to the IMS Management Committee for approval by emailing the document(s) to documents@ctilogistics.com

Refer to *POL-0003 Document Review and Approval* for more information.

4.3 Maintenance of Business Records

Employees are to ensure that they accurately and rigorously maintain all records relating to CTI's business and its operations. Such records include, but are not limited to:

- Correspondence, memoranda, reports, emails and file notes
- Internal Audit reports
- Customer Service Improvement Requests (CSIRs)
- Project plans
- Service Operating Procedures (SOPs)
- Risk Assessments
- Safety Documentation
- Journey Management documentation
- Vehicle maintenance records
- Other HVAA-related documents

Employees shall:

- Ensure all written communications are businesslike and do not contain material that would harm our reputation if made public
- Group and file all records in a logical manner for ease of reference
- Ensure electronic records are kept in a logical sequence and regularly backed up

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- Place all relevant records into long term storage with CTI Records Management
 - Maintain a register of the records that have been placed in long term storage
- Records shall be stored and maintained in such a way that they are readily retrievable and are protected against damage, deterioration or loss. All records shall be stored for a minimum of two years or for longer periods if this is required for statutory purposes.

Refer to *PRC-0013 Procedure for Document Control & Records Management* for more information.

4.4 CTI Assets and Equipment

Employees and Contractors are responsible for protecting all CTI assets and equipment that is under their care. This includes:

- Company motor vehicles - cars and trucks
- Materials handling equipment (forklifts, etc.)
- Office equipment including laptops and desktop computers
- Mobile phones, iPads, PDAs, scanners and other handheld devices
- Machinery
- Storage racks
- And all other Company owned assets

Employees and Contractors are to ensure they take adequate care of CTI assets and equipment. CTI assets and equipment shall only be used for the purposes intended and in accordance with standard modes of operation.

Employees and Contractors are to make all reasonable efforts to protect CTI assets and equipment in their care from theft or damage.

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5 INFORMATION TECHNOLOGY & COMMUNICATIONS SYSTEMS

CTI has policies and procedures covering the acceptable use of CTI's information technology and communications systems that collectively comprise CTI's IT Environment. CTI's IT Environment covers all CTI computer and communications systems, including hardware, software, networks, infrastructure, and the data contained within. This includes mobile as well as fixed infrastructure and equipment.

Throughout this Section 5 "Users" refers to Employees, Contractors, or any other persons having or requiring access to or use of any part of CTI's IT Environment.

The below points are a summary of the key requirements and expectations of Users in relation to use of CTI's IT Environment.

Refer to *POL-0013 Information Systems Security & Acceptable Use Policy* and *POL-0014 Information Systems Security & Acceptable Use Policy - Staff Compliance Guidelines* for more information.

5.1 Information Security

All information contained within and/or travelling over CTI's IT Environment is to be treated as a CTI corporate asset (CTI Information). It is the policy of CTI to protect CTI Information from unauthorised access, disclosure, duplication, modification, diversion, destruction, loss, misuse, or theft, and to ensure that third party information entrusted to it is protected in the same manner, as well as in accordance with applicable contracts.

Users of CTI's IT Environment are required to comply with the following:

- Take reasonable steps to keep their passwords private, and not disclose their password(s) to any other person(s)
- Not use another person's login and password to access CTI's IT Environment
- Only access or otherwise use CTI Information for purposes directly related to their employment / duties with CTI
- Are not to make or facilitate any unauthorised disclosure, distribution, diversion, or theft of CTI Information
- Shall not make unauthorised copies of CTI Information (paper or electronic)
- Not remove any CTI Information from CTI premises unless specifically required for a particular work assignment and expressly authorised by CTI management
- Make all reasonable efforts to protect CTI Information from unauthorised destruction, deletion, or modification.

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- Where possible, important CTI Information should be stored on CTI Servers rather than Users' local workstations or laptops
- Ensure that any CTI Information stored locally on their workstations or laptops is backed up on a regular basis

5.2 Non-Work Related Information

CTI reserves the right to block, delete, or otherwise dispose or cease transmission of any information contained or transmitted via CTI computer networks or communications systems that is not work related, or is otherwise inappropriate.

5.3 IT Equipment & Software

CTI's IT Equipment including PCs, laptops, iPads, PDAs, and scanners is provided to enable Employees and Contractors to satisfactorily perform their duties. The following guidelines apply to the use of CTI's IT Equipment:

- IT Equipment is not to be tampered with by Users, including changing system parameters or settings
- Users are not to attach or remove any equipment or accessories without the prior authorisation of CTI Information Systems staff
- Users must only use software and apps that have been authorised / supplied by CTI Information Systems department, and must not install any software or apps unless instructed by CTI Information Systems staff to do so
- Under no circumstances are Users to install software belonging to CTI on any personal equipment unless specifically authorised by CTI Information Systems management

5.4 Internet and Email Use

CTI provides internet and email facilities on CTI's IT Environment for the following work related purposes:

- To communicate with fellow Employees, Contractors, clients and potential clients, suppliers and potential suppliers regarding matters within an Employee's regular duties
- To acquire information relating to matters that fall within a User's regular duties
- To facilitate the performance of any task or project in a manner approved by a User's manager or supervisor

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Internet and email is not to be used for any non-work related activities during Company time, and this specifically includes personal use of social networking sites (Facebook, Twitter etc.), the sending or propagation of chain letters, gambling, or accessing or distributing pornographic material.

Users must not at any time, including outside of work, use online forums (social networking sites, blogs, etc.) to make adverse references in relation to CTI businesses, products, services, Employees or Contractors.

Email is not a secure medium, and may be viewed by persons other than the intended recipient(s). Please ensure that at all times email correspondence is professional in both form and content as this can reflect upon the Company as a whole.

5.5 Acceptable Use

CTI's IT Environment is provided for work related purposes only, and employees and contractors may use them for any purposes that fall within their regular CTI work duties, or for other such tasks as may be assigned by a CTI manager.

CTI's IT Environment must not be used for:

- The sending, downloading, installation, distribution, dissemination, printing, or publishing of statements, language, or imagery that it is reasonable to assume is likely to give offence to another party (whether intended or not), including (but not limited to) discriminatory or sexually explicit messages or imagery
- Any activity in violation of local, state, or federal laws and regulations
- The purposes of operating a business, usurping business opportunities, soliciting money (or other inducements) for personal gain, or searching for jobs or opportunities outside of CTI
- Impersonating or masquerading as another person or representing as holding a position within CTI that you do not hold. This includes, but is not limited to, misrepresenting to be someone else on a phone call, or via written or electronic communication, or pretending to be someone else on a social networking site

Refer to *POL-0013 Information Systems Security & Acceptable Use Policy* and *POL-0014 Information Systems Security & Acceptable Use Policy - Staff Compliance Guidelines* for more information.

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6 CHAIN OF RESPONSIBILITY

CTI is committed to complying with the legal and operational requirements of the Chain of Responsibility legislation. The CTI Chain of Responsibility systems are designed to ensure the health, safety and welfare of all those who are involved in the storage and distribution of goods - including receivers, packers, loaders, Drivers, contracted transporters, other parties in our transport chain and the general public.

All Employees are responsible for supporting and implementing the CTI Chain of Responsibility Policy and its supporting procedures as it applies to their role.

CTI is committed to providing Employees and Contractors with ongoing training and education about all relevant aspects of the Chain of Responsibility.

If you are unsure of your obligations under the Chain of Responsibility legislation you should check with your supervisor or manager.

Refer to *POL-0022 CTI Chain of Responsibility Policy* for more information.

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