



CTG

Committed to Good

CODE OF CONDUCT



PHILOSOPHY, MANAGEMENT AND APPLICATION

1. POLICY

Directors (being regional directors and officers of CTG Global Managed Services DMCC), employees, contractors and consultants (hereinafter referred to as “Stakeholders”) engaged by CTG or any subsidiary or associated company (hereinafter referred to as “CTG”) shall conduct themselves in accordance with this Code of Conduct (hereinafter referred to as the “Code”) (which reflects the values of CTG).

The environments in which CTG operates are often fragile, post-conflict or post-disaster regions, with the potential for individuals to be exposed to extreme risk and personal injury. This Code is designed so that adherence to it by stakeholders will ensure their wellbeing and ensure that CTG conducts itself as a responsible and ethical services provider.

2. STATEMENT FROM THE BOARD

The board of directors of CTG (the “Board”) is committed to ensuring that stakeholders comply with this Code and thereby conduct themselves and CTG’s business in keeping with the highest moral and ethical standards. The Board wishes to promote a culture of ethical and accountable behavior and encourages the reporting (whether to applicable CTG personnel or through CTG’s whistleblowing mechanism) of corrupt practices, breaches of the law and matters potentially detrimental to CTG’s business or reputation.

3. CORE PRINCIPLES

This Code is underpinned by a set of core principles that ensure CTG conducts its business in compliance with the letter and spirit of the law. These principles guide us to operate in a socially responsible manner, prioritising the best interests of our clients, stakeholders, and the communities we serve.

CTG’s core principles are:

- Integrity
- Accountability
- Transparency
- Respect
- Inclusion

To implement these core principles, CTG follows specific guidelines on how to do business and how to operate (such as compliance with the law, ethical conduct, operational excellence).

In addition to its core principles, CTG, as a signatory to the UN Global Compact, expects all stakeholders to understand, adhere to and support the [Ten Principles of the United Nations Global Compact](#) and the [7 Women’s Empowerment Principles](#).

4. SCOPE AND APPLICATION

This code, and the regulations, rules, policies and procedures referred to or linked to herein, apply to all stakeholders. All stakeholders are required to confirm that they have read and understood the Code and confirm that they will conform to its provisions.

In addition, where a stakeholder retains third-party agents, contractors and/or consultants ("Third Parties") to represent or perform work on behalf of CTG, the stakeholder shall make them aware (a) of this code and (b) the requirement that when acting for or on behalf of CTG third parties are required to conduct themselves in accordance with this code.

CTG maintains a zero-tolerance policy for any violation of this code and the regulations, rules, policies and procedures referred or linked to herein; any such violations shall result in (i) disciplinary action up to and including dismissal in accordance with the relevant labour law or (ii) appropriate contractual enforcement, up to and including immediate termination of any applicable contract.

5. CONFLICT OF INTEREST

A "conflict of interest" occurs when political, personal or financial interests interfere with CTG's interests or the interests of CTG's clients or partners. Stakeholders must avoid (i) any conflict of interest and (ii) any situation that creates even the appearance of a conflict of interest. For example, stakeholders must not, without prior written consent of a director:

- offer their skills or services to competitors or potential competitors;
- engage in or directly or indirectly have an equity interest in a business that competes with or sells goods or services that are competitive to CTG;
- offers similar services directly to CTG's clients;
- recommend or place business with a firm owned or controlled by another stakeholder or his or her family;
- act as a consultant to a supplier, client or competitor of CTG or be employed by them or take money from them;
- have any financial or other relationships with local business partners, suppliers, clients or competitors that would impair the independence of any judgement they may need to make on behalf of CTG;
- perform, for any personal gain, services to any CTG supplier of goods or services or any other organization that does business with or serves CTG;
- use their position for personal gain or to benefit any other business or person in any way that might contradict either the spirit or literal meaning of this Code; or
- gain personal enrichment as a result of access to confidential information through their role at, or with, CTG.

Any existing business activity or work which does, or may, represent a conflict of interest must be disclosed to the Ethics Committee immediately.

In matters of conflict, or potential conflict of interest, it is recognised that there will be degrees of influence or involvement. In all cases of doubt stakeholders are expected to exercise maturity of judgment and act at all times in the best interests of CTG. If there is any doubt, the matter should be reported to the Ethics Committee for review, advice, and further action. Conflicts of interest should be regularly reviewed and updated, especially if stakeholders' roles or relationships change over time.

CTG's Executive Committee shall be responsible for disclosing to CTG's clients any situation that may appear to pose a conflict of interest with respect to the relevant contract. CTG's Executive Committee shall also disclose to its clients if any official or professional under contract with CTG's clients may have an interest of any kind in CTG's business or any kind of economic ties with CTG.

Failure to disclose conflicts of interest could lead to (i) disciplinary action, including termination or legal action or (ii) appropriate contractual enforcement, up to and including immediate termination of any applicable contract.

6. RESPONSIBILITIES FOR DEALING WITH EXTERNAL PARTIES

Stakeholders must not, without prior written authority from a director, directly or indirectly state that they are representing CTG, its clients or its public position in respect to any matter. Stakeholders must never (unless specifically engaged by CTG or CTG's clients to do such) suggest that they are speaking on behalf of CTG or CTG's clients when presenting personal views at community, professional, cultural events, on the internet or on any form of social media (including but not limited to Facebook, Instagram, Twitter, LinkedIn, YouTube, Snapchat, WhatsApp, Viber). CTG's and CTG's clients' brand, logo and service mark must only be used for CTG or CTG's clients' purposes in strict compliance with CTG and/or CTG's clients' procedures and may not be used for other reasons without prior approval from a director.

Stakeholders must refrain from directly or indirectly engaging in any activity, either alone or in association with others, that could cause CTG or its client's public embarrassment, reputational risk or attract unfavorable attention from media (including social media), local / national authorities or the public. This includes actions, behaviors, or communications that could negatively impact CTG's or its clients' reputation, public perception, or legal standing (and includes, but is not limited to, inappropriate personal comments on social media).

Stakeholders must use all reasonable efforts to ensure that (i) they do not associate with and that none of the funds or resources received as a result of the relationship with CTG are used to provide support to individuals or entities associated with terrorism, individuals or entities who appear on the list maintained by the Security Council Committee established pursuant to resolution 1267 (1999) (<http://www.un.org/sc/committees/1267/1267.htm>), the Consolidated United Nations Security Council Sanctions List (<https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>) or any other similar list that may be established by the UN Security Council and (ii) that none of the funds or resources received as a result of the relationship with CTG are used in any other manner that is prohibited by a resolution of the United Nations Security Council adopted under Chapter VII of the charter of the United Nations.

(a) Political Activities

While stakeholders' political beliefs remain inviolable, stakeholders must ensure that those views do not adversely affect their duties and/or the neutrality, impartiality and independence of their status when representing the company or its clients. This means that stakeholders shall refrain from publicly (including on social media) expressing their political views in a manner which might directly or indirectly appear as if they are speaking on behalf of or in association with CTG or CTG's clients. Stakeholders must further not misrepresent their relationship with CTG or CTG's clients.

Although CTG stakeholders are free to exercise their right to vote, they may not be candidates for public office, whether at a national or local level. The holding of a political party office, membership of any political campaign committee, acceptance or solicitation of any financial contribution for political purposes is also improper. Stakeholders should exercise discretion in their support of a political party, political candidate or political issue and refrain from delivering public speeches, statements to the press or articles on such matters. It is the stakeholder's responsibility to immediately disclose any affiliations or political activity which may create a conflict of interest.

7. DEALING WITH FORMER STAKEHOLDERS

Stakeholders must not discuss proprietary or confidential business matters or share any information about a client, supplier, business partner, present or former colleague or other stakeholders with former stakeholders.

Doing business with former stakeholders should be discussed and approved in writing by a director, in consultation with the Ethics Committee. If a Stakeholder has any doubts or questions about the appropriateness of communicating with former stakeholders, they should discuss and seek guidance and clarification from a director (with copy to the Ethics Committee). This step is essential to protect the interests of CTG, its clients, and stakeholders, ensuring that any actions taken are in full compliance with CTG's policies and legal requirements.

8. IMPROPER USE OF CTG OR ITS CLIENTS' INFORMATION

Stakeholders will, on occasion, have access to private, confidential or sensitive information including but not limited to business affairs, transactions, accounts, operations, work, trade secrets, investigations, discoveries, intellectual property, financing, personnel, government information, business and management systems, private communications, medical records, payroll and financial information.

Stakeholders must not disclose confidential information belonging to or pertaining to CTG or any of its clients to any third party without prior written consent of a director of CTG. For the avoidance of doubt, confidentiality of information should also be adhered to internally and only shared internally to other Stakeholders as necessary and permitted.

If confidential information must be shared with third parties (in compliance with all confidentiality undertakings and this Code), such third parties must agree in writing and in advance to observe confidentiality restrictions in respect to such information. Stakeholders must not use any information about CTG or its clients for the purpose of directly or indirectly obtaining personal gain or to advantage any other person or entity.

Accessing, using and/or disclosing such information other than in the legitimate pursuit of employment duties constitutes misuse. Any misuse or unauthorised release of such information, either during employment or subsequent to the conclusion of employment at CTG, may be grounds for disciplinary action up to and including dismissal, termination of contract and/or the initiation of legal action against the stakeholder.

9. DATA PROTECTION AND PRIVACY

CTG's Privacy Policy sets out the details of the collection, storage, use, disclosure, access to, and correction of personal data by CTG. Protecting sensitive data and preventing its abuse or misuse are both essential to CTG's operations. CTG is committed to protecting the information and data it handles or that is handled on its behalf and CTG will aim to prevent actions which could result in harm, embarrassment, inconvenience, or unfairness to anyone with whom it has a relationship with. This obligation is equally vital for all stakeholders who work with CTG. It is the essential duty of every stakeholder to preserve and protect the privacy rights and personal data of all those they deal with in the performance of their duties. This includes collecting, maintaining, transmitting, or storing personal data as per CTG's policies and legal best practice and using proper collection, transmission, and storage methods.

CTG expects all its stakeholders to ensure they are aware of and comply with all applicable laws regarding data protection and privacy (for example the EU's General Data Protection Regulation (2016/679)). <https://2z8wph1nziup1zx4ko89iqbn-wpengine.netdna-ssl.com/wp-content/uploads/2020/07/Privacy-Policy.pdf> Where there are no applicable laws in place or where those laws are basic or out of date CTG expects at a minimum that all its stakeholders conform to the following principles based on the United Nations Global Pulse's [Privacy and Data Protection Principles](#). :

- To only access, analyse and otherwise use data that has been obtained by lawful and fair means, including, where appropriate, with the knowledge of the individual;

- To ensure, to the extent possible, that all the data used by CTG stakeholders for business purposes is adequate, relevant and not excessive in relation to the legitimate and fair purposes for which the data was obtained;
- To not knowingly or purposefully access, analyse or otherwise use personal data which was shared by an individual with a reasonable expectation of privacy without the knowledge or consent of the individual;
- To ensure reasonable and appropriate technical and organisational safeguards are in place to prevent unauthorised disclosure or breach of data;
- To ensure that data use is limited to the minimum necessary for CTG to perform its business in line with its contractual and/or legal requirements; and
- To ensure that the data used for CTG's business purposes is stored only for the necessary duration and that any retention of it is justified.

To learn more about how CTG manages and expects its stakeholders to manage personal data; please read CTG's Privacy Policy [here](#).

Failure to comply with the abovementioned principles or with the applicable law regarding data protection and privacy, may be grounds for disciplinary action up to and including dismissal and/or the initiation of legal action against the Stakeholder.

10. ANTI-BRIBERY AND ANTI-CORRUPTION

A "bribe" is defined as an offer, promise or authorisation, to give, or the giving of, anything of value to influence the actions of a third party (e.g., clients, suppliers, intermediaries, agents, contractors, or government officials). Bribes may include money, gifts, travel, hospitality, discounts, favours, business or employment opportunities, political or charitable contributions or any direct or indirect benefit or consideration given with the intent to persuade someone to act in one's favour. Bribery violates anti-corruption laws. All stakeholders must make themselves aware of and follow all applicable anti-corruption laws (including but not limited to the UK Bribery Act and the FCPA).

It is CTG's policy to conduct its business in an honest and ethical manner; there is a zero-tolerance approach to bribery and corruption. CTG is committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever our operations are being conducted. Additionally, the company is committed to implementing and enforcing systems to counter bribery and corruption. In short it is a breach of policy amounting to gross misconduct to:

- Bribe a third party;
- Accept a bribe;
- Bribe a foreign government official; or
- Fail to report bribery.

Any incidence or suspected incidence of bribery and corruption is to be reported immediately to the Whistleblower line and/or to the Ethics Committee and it is to be investigated fully prior to any action being taken.

The company's full policy and procedures on anti-bribery and corruption can be found [here](#).

11. REPORTING AND RECORDS

Stakeholders must ensure that all CTG accounting records accurately and fairly reflect, in reasonable detail, all transactions and any relevant bases and factors underpinning or affecting them, any relevant contingencies, and all CTG's assets and liabilities.

Accounting records must be maintained in accordance with generally accepted international accounting principles and the financial and accounting policies issued by CTG. Any stakeholder found to have intentionally prepared inaccurate reports, forms or other documents that will be relied upon by CTG to be an accurate record of the circumstances described in the record or that are to be disclosed to third parties or clients shall be subject to disciplinary action up to and including dismissal.

Stakeholders must fully cooperate with CTG's internal and external auditors. Stakeholders must not knowingly make false or misleading statements to the internal or external auditors of CTG and must not conceal any relevant information from the internal or external auditors of CTG.

Documents and other records must be retained in accordance with the requirements of the law, governing contracts and/or CTG policy. Stakeholders must familiarise themselves with these requirements and act accordingly; if the Stakeholder has any queries they should seek advice from a director.

Documents that are in any way related to an ongoing or potential investigation of CTG by any government or UN agency must be protected and cannot be destroyed unless and until any such investigation has ended and destruction has been authorized by a director.

CTG corporate records and documents must not be removed from CTG premises or used for personal gain or benefit. From time-to-time CTG may be involved in legal proceedings that may require CTG to retain or make some records available to third parties. The law regarding retention of documents applies equally to all of CTG's records, whether in electronic or paper format, including formal reports as well as informal data such as e-mail, expense reports and internal memos. If the existence of a lawsuit or threatened legal claim, subpoena or a government investigation is known or reported to you, you should immediately contact the CEO and you must retain all related records. Stakeholders are on notice that it is a crime to alter, destroy, modify or conceal documentation or other objects that are relevant to an investigation or otherwise obstruct, influence or impede an official proceeding and any such behavior shall result in disciplinary procedures up to and including dismissal and/or the initiation of legal action against the stakeholder.

12. USE OF CTG AND CTG'S CLIENTS' FUNDS

All stakeholders are required to follow CTG procedures in relation to the use of assets provided by CTG and/or CTG's clients, the incurring of expenses related to CTG business and/or CTG's clients' projects and the spending of CTG funds.

Misappropriation of CTG or CTG's clients' funds shall not be tolerated; company, divisional and consolidated budgets must be adhered to at all times unless prior written consent of a director has been obtained.

Stakeholders must never participate (directly or indirectly) in any dishonest or fraudulent activity in relation to funds of CTG, CTG's clients and suppliers. This may not only entail disciplinary actions and/or termination of contract but also result in criminal charges.

If any stakeholder is found to have committed a dishonest or fraudulent act; misused or misappropriated CTG funds; embezzled CTG funds; forged or altered negotiable instruments (such as CTG cheques or drafts); misappropriated CTG, client, partner or colleagues' assets; used CTG cash, securities, supplies, property or other assets for personal use; mishandled or misreported transactions; or falsified financial records, reports or statements they shall be subject to disciplinary procedures up to and including dismissal, termination of contract and/or the initiation of legal action against the stakeholder.

13. ANTI-FRAUD AND ANTI-COLLUSION

To commit fraud means to intentionally deceive a person or organisation in order to secure unfair or unlawful gain. An act of fraud can be considered a criminal offence, depending on its severity and consequences.

To engage in collusion means to secretly cooperate or conspire with others to deceive or manipulate a process for unfair or unlawful gain. Collusion often involves unethical agreements between individuals or entities to distort competition, misrepresent facts, or circumvent established procedures.

Fraudulent and collusive acts seriously damage CTG and our client's professional reputation. This is why CTG has a zero-tolerance policy when it comes to these prohibited activities. CTG is committed to preventing fraud and collusion from occurring in our operations, to developing an anti-fraud culture and to the thorough and transparent investigation of any reported cases.

Any incidence or suspected incidence of fraud or collusion must be reported via the whistleblower line and to the Ethics Committee and it is to be investigated fully prior to any action being taken.

14. USE OF CTG AND CTG'S CLIENTS' ASSETS

All stakeholders are responsible for safeguarding assets under his or her control. Stakeholders have a responsibility to protect CTG and CTG's clients' assets from loss, theft, misuse, destruction and waste. Stakeholders must never participate (directly or indirectly) in any dishonest or fraudulent activity involving the property or assets (e.g. theft).

In general, personal use of supplies, equipment or premises belonging to CTG or CTG's clients for non-work related purposes is prohibited, unless prior permission is received from a director. General exceptions include the occasional use of CTG-owned computers to send and receive personal e-mails and the use of CTG telephones to make or receive personal, local telephone calls so long as neither activity interferes with CTG business and adheres to CTG internal policies for expense reimbursements, mobile phone usage and company asset usage. Be aware that personal use of CTG computers and mobile phones may be visible to CTG and CTG reserves the right to access your CTG computer/emails/files/call logs/messages without notice. Stakeholders must ensure that their occasional personal use does not cause embarrassment to the Stakeholder or CTG.

CTG and CTG's clients' assets, including computer and mobile devices, shall never be used to conduct prohibited or illegal activity, including illegal internet searches.

Where CTG owns the computers and/or mobile devices supplied to stakeholders all correspondence that is sent from or received through the company's systems or on a company asset is also owned by CTG. CTG may be required to provide emails, computer files, text messages, call logs etc in the case of investigation, litigation or governmental inquiry.

15. ALCOHOL, DRUGS AND GAMBLING

The misuse of alcohol and legitimate drugs, except as prescribed by a medical practitioner, whilst on active duty, will result in disciplinary action up to and including dismissal or termination of contract.

The use, possession, distribution or sale at any time of illicit or non-prescribed drugs, other controlled substances or locally produced organic substances deemed illegal under local Law will result in disciplinary action up to and including dismissal or termination of contract. CTG reserves the right to inform appropriate authorities.

If the country of operation prohibits the consumption and/or possession of alcohol stakeholders must adhere to and respect such local customs and laws; in such countries the use, possession, distribution or sale of alcohol will result in disciplinary action up to and including dismissal or termination of contract.

Stakeholders are strictly prohibited from consuming alcohol during working hours, including breaks or pauses in the workday. Attending work under the influence of drugs or alcohol, which includes being visibly impaired or having an alcohol concentration that affects job performance is strictly prohibited and will be subject to disciplinary action up to and including dismissal.

CTG reserves the right to test its stakeholders or those of third parties at random for substance abuse, without prior warning.

If the country of operation prohibits the participation in gambling activities, stakeholders must adhere to and respect such local customs and laws; in such countries, partaking in gambling activities will result in disciplinary action up to and including dismissal. Furthermore, gambling should not take place on CTG property.

16. CULTURAL AWARENESS

It is a requirement that stakeholders understand and are sensitive to the nuances of different cultures and religions and that they respect the legitimate beliefs and faiths of all people. It must be appreciated that this is fundamental to the safety and effectiveness of CTG's operations. Respect for host nations, cultures and practices lies at the heart of CTG's operations and CTG has a zero-tolerance policy for any lack of consideration or respect for such practices and norms.

17. HUMAN RIGHTS

Respect for the fundamental human rights of stakeholders and of persons who stakeholders encounter in and around the places CTG operates while carrying out CTG services and responsibilities is a cornerstone of CTG's values. In particular:

(b) Equal opportunities/discrimination

CTG will ensure that all activities are conducted in a manner that provides fair and equal treatment and access for all people. CTG shall not, and shall require that stakeholders do not, at any time, discriminate on grounds of race, colour, religion, gender, age, political opinion, nationality, social or ethnic origin/ background, social status, indigenous status, union membership, marital or civil partnership status, physical ability, health condition, pregnancy or maternity, disability, or sexual orientation, care responsibilities, or any other factor which cannot be justified.

CTG is committed to the principle of equal opportunity in employment for all people and looks to ensure equity and diversity in the workplace. CTG expects each stakeholder to judge and interact with other stakeholders solely on their merit, and with maturity and mutual respect.

All employment decisions, including recruitment, hiring, training, promotion, pay, job assignments, discipline and discharge shall be solely based on merit and the inherent requirements of any contract; CTG reserves the right to select the most suitable

stakeholders for tasking and deployment, having regard to assessed levels of risk of personal or fatal injury.

CTG will not tolerate any form of discrimination and should any stakeholder during their engagement with CTG encounter such, it should be reported in writing immediately to the Ethics Committee. Instances of discrimination that are, following an investigation, proven on the balance of probabilities shall result in disciplinary action up to and including dismissal.

(c) Treatment of others with dignity and respect

CTG strongly believes that every person has the right to be treated with dignity and respect and free from all forms of harassment. CTG expects all stakeholders to be courteous, fair and honest in their dealings with all other stakeholders (in particular women and girls within the communities where CTG operates), clients and third parties.

CTG will not tolerate abuse, bullying, violence, exploitation (sexual or other), discrimination, harassment, arrogance, or any disparagement of other stakeholders or of its clients. CTG will not tolerate behavior by any person which is unfair towards or with respect to any other person or group. All stakeholders have an obligation to ensure they do not engage in or condone such behavior. CTG will not tolerate aggressive or abusive behaviour against any of its permanent staff. CTG permanent staff work hard to deliver excellent customer services but are sometimes required to deliver difficult messages or may not be able to offer a desired solution to a problem. Aggressive, intimidating and abusive comments, messages or actions directed towards CTG permanent staff which are not acceptable will be reported, investigated and, if necessary, result in disciplinary action.

CTG is highly committed to protecting vulnerable persons and will make every reasonable effort to protect them, in particular women and children from the local communities in which CTG has operations, from abuse and neglect. CTG's [Safeguarding and PSEAH Policy](#) provides all stakeholders with effective and clear mechanisms to prevent, detect and report, abuse and neglect. Any such behavior is in breach of the high standards required by CTG stakeholders by this Code of Conduct, however, in light of recent issues within the humanitarian sphere, the GGC feels it is important to specifically address sexual harassment and sexual exploitation and abuse.

i. Sexual Harassment

Sexual harassment can be defined as any improper or unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behavior of a sexual nature that might reasonably be expected or perceived to cause offence or humiliation to another person.

Sexual harassment can have a detrimental effect on the victim's physical and psychological wellbeing, morale and can also disrupt the work environment and close-knit environments in which CTG stakeholders often live.

Sexual harassment in any form will not be tolerated by CTG. All complaints of sexual harassment will be treated seriously and investigated by CTG. Disciplinary sanctions will be applied where appropriate.

CTG will not, however, tolerate any false or malicious accusations, and therefore any proven false or malicious accusations of sexual harassment will also be deemed a breach of the standards of conduct required by CTG stakeholders and disciplinary sanctions applied as appropriate.

ii. Sexual Exploitation and Abuse

Sexual exploitation can be defined as any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse can be defined as the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

CTG does not tolerate any threats of, or actual, violence, sexual exploitation or abuse, verbal or psychological abuse by its stakeholders.

All sexual activity with a child (any person under the age of 18) is prohibited regardless of the age of majority or consent locally and is considered as sexual abuse. Mistaken belief in the age of a child is not a defence.

Stakeholders must read and comply fully with the UN Secretary-General's Bulletin of 9 October 2003 entitled "[Special Measures for Protection from Sexual Exploitation and Sexual Abuse](#)" (ST/SGB/2003/13), the Secretary-General's Bulletin of 18 June 2002 entitled "[Regulations Governing the Status, Basic Rights and Duties of Officials other than Secretariat Officials, and Experts on Mission](#)" (ST/SGB/2002/9) and the [UNOPS Policy on prevention of harassment, sexual harassment, and abuse of authority](#).

Stakeholders must also undertake the following mandatory trainings, in addition to any further trainings requested by CTG:

- Safeguarding Essentials
- The Prevention of Sexual Exploitation and Abuse

Any stakeholder who believes, in good faith, that he or she has witnessed or been the victim of harassment, sexual exploitation or abuse should report this immediately to the Ethics Committee (ethics@ctg.org). Instances of harassment that are, following an investigation, proven to the standard required, shall result in disciplinary action up to and including dismissal.

(d) Safeguarding

CTG recognizes that our sector is not free from potential abuse and exploitation. We are committed to safeguarding, which we take to mean protecting people, including women, children, and at-risk adults, from harm that arises from coming into contact with our staff or programmes. As such, CTG takes a zero-tolerance stance on all forms of abuse and exploitation.

To action this commitment CTG will make every reasonable effort to ensure that all stakeholders, clients and third parties protect all people, but particularly children, at risk adults and beneficiaries of assistance from harm. To that end, the company has developed a Safeguarding Policy and Procedure which provides all stakeholders with effective and clear mechanisms to prevent, detect and report abuse and neglect. CTG is aware that various factors, including a lack of awareness of risk, knowledge of abuse, confidence to respond and clear organisational practices in our sector persist and can undermine our safeguarding responsibility. The Safeguarding Policy and Procedure's purpose is to empower all stakeholders with knowledge to combat actions and behaviour which undermine our clients' goals, and which endanger any person's welfare. Any such behaviour is in breach of the high standards required of CTG Stakeholder by this Code of Conduct.

If you are found to be in breach of CTG's commitment to Safeguarding and the Prevention of Sexual Exploitation and Abuse as outlined in this Code of Conduct and associated policies, disciplinary action up to and including termination will be taken. All

suspected breaches must be reported immediately to CTG's Ethics Committee (ethics@ctg.org) or via the Whistleblower line.

(e) Labour rights and working conditions

CTG recognises and respects the rights of staff to freely associate, organise and bargain collectively in accordance with the laws of the countries in which they are employed. CTG recognises the importance of open communication and direct engagement between workers and management. CTG will respect the rights of staff to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

CTG does not use forced, bonded or indentured labour or involuntary prison labour. All work, including overtime work, will be voluntary and staff are free to leave their employment with CTG upon reasonable notice. CTG will comply with all applicable working hour requirements as established by local law and further comply with all laws and regulations regarding wages and hours, including those pertaining to minimum wages, overtime wages, piece rates and other elements of compensation and will provide legally mandated benefits to all staff.

(f) Child Labour

All CTG stakeholders must respect the rights of children (anyone under the age of 18). The minimum admission to employment or work shall not be less than the age of completion of compulsory schooling (which is generally not less than fifteen or fourteen years in those countries subject to the developing country exception of the ILO Convention 138). In the event young workers are engaged through a workplace internship or apprenticeship programme, CTG will comply with all laws and regulations governing such programmes. Additionally, CTG will not engage any young workers to perform any work that is likely to be hazardous or to interfere with the young workers' education or that may be harmful to the young worker's health, physical, mental, social, spiritual or moral development.

All stakeholders must ensure that CTG activities do not involve any form of child slavery, trafficking, debt bondage, serfdom, use of children in armed service, child prostitution, sexual exploitation, illicit acts or work that by its nature or circumstances is likely to harm the health, safety or morals of children.

CTG stakeholders are expected to report any such activity that they become aware of or have reasonable suspicion of to the competent authorities and the Ethics Committee. If child labour is involved or there is suspicion of its involvement in the supply of any service that CTG relies upon for its business an alternative supplier will be sought until the matter has been investigated.

(g) Human Trafficking

For the purpose of this code human trafficking is the recruitment, harboring, transportation, provision, or obtaining of a person for (1) a commercial sex act induced by force, fraud, coercion, or in which the person induced to perform such an act has not attained 18 years of age; or (2) labour or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, debt bondage or slavery.

CTG stakeholders will not engage in human trafficking, nor engage with any third-party provider involved in such activities. CTG requires its stakeholders to remain vigilant to such activities and to report any suspected or discovered instances to the competent authorities and the Ethics Committee.

(h) Slavery

CTG stakeholders will not use slavery, forced or compulsory labour, or be complicit in any other entities use of such labour.

18. HEALTH AND SAFETY

All stakeholders will conduct CTG activities in compliance with all relevant legislation, regulations and directives applicable to the country of operation to ensure a safe and healthy workplace. In addition, all CTG stakeholders will comply with the applicable health and safety policies for a client or a site, whilst working for a client or visiting a client's site.

19. ENVIRONMENTAL POLICY

CTG is committed to safeguarding the natural environment and expects stakeholders to conduct and manage their activities in an environmentally sustainable manner. All activities will be planned and managed to ensure minimum environmental impact and, in a manner, sensitive to the cultural and social norms of the people they may affect; as a guideline CTG expects all operations to abide by a 'leave no trace' approach.

Furthermore, stakeholders must know and follow the environmental policies and regulations that apply in their area of business and locale. Stakeholders should report any violations of environmental policies or potential hazards to their supervisor or a CTG Director.

20. CONDUCTING BUSINESS

CTG is committed to conducting its activities in compliance with all applicable local laws and regulations.

Business conducted overseas must be undertaken in accordance with applicable local laws whilst maintaining the highest ethical, social and moral values. Where ambiguity exists between local and International law, stakeholders are to adopt the higher standard.

21. COMPLIANCE WITH LAW

Stakeholders shall, at all times be and remain subject to applicable local State, Territory and Federal laws of the country of operation and shall conduct themselves accordingly at all times. It is the stakeholders' responsibility to learn, understand and conform with these laws. Stakeholders must promptly direct any questions, issues or request for further training on these areas to their manager or the Ethics Committee.

Stakeholders are on notice that it is easy to inadvertently breach local law in many overseas jurisdictions, and the consequences of doing so can be extremely severe. The rule of law may be tenuous in certain locations. Stakeholders must therefore proceed with extreme caution and ensure compliance with local laws and regulations.

Stakeholders are on notice that CTG will report any conduct (whether suspected or conclusive) of an unlawful nature to local police authorities for investigation and prosecution, without notice to the Stakeholder concerned.

22. PROCUREMENT

CTG will conduct its business fairly, impartially, in an ethical manner and in full compliance with all applicable laws and regulations as they apply to CTG's business around the world. Stakeholders involved in proposals, bid preparation or contract

negotiations must be certain that all statements, communications, certifications and representations to prospective and current clients are accurate and truthful.

At all times when engaging with the UN, CTG and its stakeholders shall take special care to fully comply with all current and applicable regulations, rules, policies and procedures that apply to UN procurement and contracting with the UN (the “UN Regulations”).

Stakeholders preparing or otherwise supporting the preparation of bids and proposals to the UN shall be familiar and comply with all applicable UN Regulations.

Any Stakeholder who obtains or receives confidential or proprietary information related to UN procurement is (i) required to promptly notify his or her supervisor and (ii) strictly prohibited from using such information unless it is publicly available or provided officially by the UN. Improper disclosure of such confidential or proprietary information could violate laws protecting such information.

CTG maintains a zero-tolerance policy for any violation of the UN regulations; any violations of the UN regulations shall result in immediate dismissal in accordance with relevant labour laws.

At all times when engaging with the FCDO, including when supporting the preparation of bids and proposals to the FCDO, stakeholders shall be familiar, and comply, with all applicable codes, conditions and regulations including but not limited to:

- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1043334/Supply-Partner-Code-of-Conduct1.docx.odt
- https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415236/Conflicts-Interest-Gifts-Hospitality-Policy.pdf

23. ANTITRUST AND FAIR COMPETITION

CTG is committed to complying with the antitrust laws in every jurisdiction in which CTG does business. CTG’s stakeholders must not engage in any form of price fixing, bid rigging, territory dividing or other similar activities with competitors that negatively impact clients or are counter to free market principles. CTG will compete for business fairly and will not communicate with competitors regarding prices, costs, profits or marketing strategies.

24. MARKETING AND ADVERTISING

CTG is committed to representing its services and offerings fairly, honestly and accurately. Stakeholders must not release any advertising, marketing or promotional material that unfairly describes the services of a competitor or makes disparaging comments or innuendo. All advertising, marketing and promotional material must be signed off by a director.

As part of CTG’s gender equality agenda, the portrayal of harmful gender stereotypes is strictly monitored and banned throughout the entirety of CTG’s operations including, but not limited to, all advertising, marketing and promotional material released by the Company.

Stakeholders are advised that advertising (including on social media), marketing and promotional materials must not state that CTG provides or have provided services to the UN. Thus, considered effort must be made to ensure that any advertising, marketing and promotional materials does not contain the name, emblem or official seal of the UN

or any UN agency unless prior written consent has been obtained from the UN client named.

25. INTERNATIONAL TRADE

Various governments and multinational organisations control the international movement of certain commodities, manufactured products, technical data, and services, and maintain full or partial trade embargoes and economic sanctions on certain targeted countries, entities and individuals. These controls may apply to imports, exports, financial transactions, investments, and other types of business dealings. CTG and its stakeholders will comply with international trade laws.

26. WHISTLEBLOWERS

CTG is committed to maintaining a safe reporting environment that is free of fear, bullying and other negative consequences. Our full Whistleblowing procedure can be found [here](#) and must be adhered to.

CTG expects its stakeholders to be proactive; all stakeholders are expected to report to the Ethics Committee (ethics@ctg.org) good faith concerns about actual or suspected violations of this Code or any of the regulations, rules, policies and procedures referred to or linked to herein.

CTG will not harass or retaliate against any stakeholder or person who reports, in good faith, a suspected violation or concern or participates in the investigation of such suspected violation or concern, nor will it tolerate harassment or retaliation by other stakeholders. Retaliation against stakeholders who make such reports is subject to disciplinary action up to and including dismissal. CTG will investigate all allegations of retaliation, whether overt or subtle, and take appropriate action.

Furthermore, any Stakeholders found by CTG to have harassed or retaliated against any person who has reported in good faith a suspected violation or concern as set out above, will face disciplinary action up to and including dismissal or termination of contract.

27. CTG GOOD GOVERNANCE COMMITTEE

The Good Governance Committee's (the "GGC") objective is to promote operational excellence throughout the entire organisation. The GGC is also responsible for confirming CTG meets the benchmark parameters and legal requirements with respect to the services we provide to our clients, particularly in relation to salaries, HR practices, local labour law, industry standards, etc.

The GGC will be responsible for the periodic review and continuous improvement of this Code, CTG's policies and overall good governance across the board to reflect evolution in international best practices. The GGC acts as an unofficial auditing body for CTG's corporate governance and as part of this monitors compliance with the Code to ensure that the applicable compliance and ethical standards are met.

28. CTG ETHICS COMMITTEE

The Ethics Committee is established to ensure a rapid and appropriate response in the event that potential ethics issues arise or are reported via CTG's whistleblowing mechanism (ethics@ctg.org). The Ethics Committee is responsible for ensuring CTG responds appropriately to any whistleblowing to minimise the impact on CTG (and potentially the wider community) and to advise on, and promote, any changes that may

be necessary to CTG's operational policies or otherwise to minimise any such reported incident(s) going forward.

All stakeholders are expected to report to the Ethics Committee (ethics@ctg.org) good faith concerns about actual or suspected violations of this Code or any of the regulations, rules, policies and procedures referred or linked to herein. The Chair and no less than two other members of the Ethics Committee (selected by the Chair depending on the nature and location of the issue raised) will meet within a minimum of 48 hours to discuss the reported violation and shall promptly and thoroughly investigate the issue and determine how best to address any reports made.

When required, the Ethics Committee will consult with the GGC and/or outside counsel for assistance in determining the appropriate course of action.