

Supplier Code of Conduct

At a glance

This Supplier Code of Conduct Policy (“**this Code**”) sets out Supplier’s obligations in relation to social, environmental and ethical compliance relating to provision of Goods and /or Services to One New Zealand Group Limited. This Code is designed to promote safe and fair working conditions and the responsible management of social, ethical and environmental issues within One NZ’s supply chain.

We expect Suppliers to adhere to local legislation & international standards regarding (but not limited to) Climate-related Disclosures, Forced Labour, Child Labour, Working Conditions, Wages & Benefits, Discrimination and Rights, Freedom of Association. Furthermore, we encourage our Suppliers to:

- monitor, report and reduce environmental impact.
- understand the social impact on communities in which they operate, and have robust policies and programmes to maintain good relationships with those communities.
- work towards having a workforce that is demonstrably diverse and has high levels of pay equity.
- track and report on progress with reference to the United Nations’ Sustainable Development Goals.

Scope

This Code applies to all Suppliers that provide Goods and /or Services to One New Zealand Group Limited (**One NZ**) including all officers, employees, contractors, subcontractors and agents of Supplier.

Compliance levels are monitored and reviewed by appropriate governance bodies.

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1. General Requirements

- 1.1. The phrase “Supplier” in this Code shall, where relevant, include all officers, employees, contractors, subcontractors and agents of Supplier.
- 1.2. Supplier shall comply with all relevant laws, regulations and standards in all of the countries in which it operates.
- 1.3. Supplier is required to take all reasonable steps to promote this Code to all officers, employees, contractors, subcontractors and agents of Supplier.

2. Monitoring, Corrective Action and Reporting

- 2.1. Supplier is required to identify, correct and monitor the continued compliance of any activities that fall below the standards of this Code.
- 2.2. Supplier shall immediately report to One NZ any serious breaches of this Code and together with One NZ agree a schedule for corrective action.
- 2.3. A breach of this Code may be considered to be a material breach of contract with One NZ, and One NZ accordingly reserves all its legal rights and remedies in respect of any such breach.
- 2.4. One NZ may report progress (or extent thereof) in Supplier's compliance with this Code, in the annual One NZ Sustainability Report, and Supplier agrees to such disclosure.
- 2.5. Supplier shall provide One NZ with reasonable access to all relevant information and premises for the purposes of assessing performance against this Code, and use reasonable endeavours to ensure that subcontractors of the Supplier do the same. Audits may be conducted by an independent third party on behalf of One NZ. Audits may also be conducted jointly between One NZ and Supplier, and include the assistance of an industry representative, or relevant Non-Governmental Organisation.

3. Principles

3.1. Child Labour

- 3.1.1. Supplier shall strictly prohibit the use of child labour. No person shall be employed by the Supplier, subcontractors and agents of Supplier who is below the minimum legal age for employment.
- 3.1.2. The minimum age for employment shall be the age for completing compulsory education in the relevant country or not less than 15 years of age (or not less than 14 years, in countries where educational facilities are insufficiently developed, in accordance with international principles), whichever is higher.
- 3.1.3. Children (persons under the age of 18) shall not be employed for any hazardous or night work, or work that is inconsistent with the child's personal development.

3.1.4. In the event Supplier discovers a child is employed, the best interests of the child shall be the primary consideration. Supplier shall contribute, support and/or develop policies and programmes that assist any child found to be performing child labour in the course of providing Goods and /or Services directly or indirectly to One NZ.

3.2. Forced Labour

3.2.1. Supplier shall not use any form of forced, bonded, compulsory labour, slavery or human trafficking.

3.2.2. Supplier's employees shall be entitled to leave work or terminate their employment with reasonable notice. Employees shall be free to leave work after such reasonable notice period expires. All employment shall be voluntary. Supplier shall provide each of its employees with an employment contract which contains such a reasonable notice period.

3.2.3. Supplier shall not require employees to lodge deposits of money or withhold payment or place debt upon employees or require employees to surrender any government-issued identification, passports, or work permits as a condition of employment.

3.3. Working Hours

3.3.1. Supplier shall ensure working hours of Supplier's employees do not exceed the maximum set by local law and each employee's working week does not exceed 60 hours per week including overtime.

3.3.2. Supplier shall allow each of its employees at least one day off following every six consecutive working days.

3.3.3. Supplier shall grant its employees the right to paid leave.

3.3.4. In exceptional circumstances (which may include emergency situations, but shall not include anticipated peaks in production requirements), when these hours might be exceeded by Supplier's employees, working hours shall in any event not be excessive. Supplier shall be considerate to the type of work performed and the acceptable working hours for the role concerned.

3.3.5. Supplier shall compensate overtime at a premium to the relevant employee's standard hourly rate.

3.4. Payment

3.4.1. Supplier shall ensure its employees understand their employment conditions and give employees fair and reasonable pay as well as any legally entitled or agreed benefits.

3.4.2. Supplier shall not use deductions from wages as a disciplinary measure. Employees must be paid in a timely manner, and Supplier must clearly convey to its employees, the basis on which they are paid.

3.5. Abuse

3.5.1. Supplier will treat all employees with respect and dignity. Supplier shall prohibit and take reasonable steps to prevent physical or verbal abuse or other harassment and any threats or other forms of intimidation.

3.6. Discrimination

3.6.1. Supplier shall not engage in or support any form of discrimination in hiring, employment terms, remuneration, access to training, promotion, termination, retirement procedures or decisions including but not limited to: race, colour, age, veteran status, gender identification, sexual orientation, pregnancy, ethnicity, disability, religion, political affiliation, trade union membership, nationality, indigenous status, medical condition, HIV status, social origin, social or marital status and union membership.

3.6.2. Supplier shall ensure no form of discrimination is present at any stage of employment, from the selection of suitable applicants, their interview and assessment, to the terms of their employment, payment and grounds for dismissal.

3.7. Freedom of Association & Right to Collective Bargaining

3.7.1. Supplier shall respect the rights of employees to join or not to join trade unions or similar representative bodies and the rights of employees to collective bargaining to the extent permitted by applicable law. Supplier shall allow open communication and direct engagement between its employees and management in building employee relations and for the resolution of any issues.

3.8. Anti-bribery, Corruption and Individual Conduct

3.8.1. Supplier shall not tolerate or enter into any bribery, including improper offers or payments to or from employees, customers, suppliers, organisations or individuals.

3.8.2. Supplier shall:

- have an anti-bribery policy that sets out the principle of zero tolerance to any form of bribery or corruption within their organisation, including facilitation payments;
- not give, promise, receive or request any bribes (financial or other advantage), including but not limited to in relation to any public official;
- ensure its employees, contractors and sub-contractors are aware of its anti-bribery policy and how to comply with its requirements.

3.9. Fraud and money laundering

3.9.1. Supplier shall:

- act in accordance with all applicable local and international standards and laws on fraud and money laundering;
- not do or omit to do anything likely to cause any party to breach such laws or standards;

- maintain an effective anti-fraud and (where appropriate) an anti-money laundering compliance programme, designed to ensure compliance with the law including the monitoring of compliance and detection of violations.

3.10. Responsible Sourcing of Minerals

3.10.1. Supplier will have a policy or process to avoid the purchase of conflict minerals.

3.10.2. In particular, Supplier shall have a policy or process to reasonably assure that the tin, tantalum, tungsten, cobalt, and gold in the products it manufactures does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Supplier will exercise due diligence on the source and chain of custody of these minerals & make their due diligence measure available upon request.

3.11. Health & Safety

3.11.1. Supplier shall provide a healthy and safe working environment for employees, contractors, partners or others who may be affected by Supplier's activities, in accordance with international standards and national laws.

3.11.2. Supplier shall put in place mechanisms to ensure that health and safety obligations are communicated and applied to parties under its control.

3.11.3. Supplier shall ensure it meets general principles of health and safety risk prevention. General principles include identifying, minimising and preventing hazards, using competent and trained people, providing and maintaining safe equipment and tools, including personal protective equipment as required.

3.11.4. Supplier shall have mechanisms and shall implement them to ensure that all its employees are competent to carry out the health and safety aspects of their responsibilities and duties. This shall include the nomination and training of persons at an appropriate level (and in particular executives), who are responsible for discharging Supplier's health and safety obligations.

3.11.5. Supplier shall ensure facilities and amenities, including employee accommodation where provided by Supplier, shall be hygienic, safe & meet basic employee needs.

3.11.6. Supplier shall have systems and training to prepare for and respond to accidents, health problems and foreseeable emergency situations. Supplier shall have means and procedures in place for recording, investigating and implementing learning points from accidents and emergency situations.

3.11.7. We encourage suppliers to track and report on the health and safety of employees, using suitable metrics.

3.12. Environment

3.12.1. Supplier shall implement robust environmental protection policies and/or an environmental management system to the extent applicable to Supplier's business.

- 3.12.2. Supplier shall comply with relevant legislation and international standards, and in countries where environmental legislation is not evident or enforced, ensure reasonable practices for managing environmental impacts are in place.
- 3.12.3. Supplier shall obtain, maintain and keep current all necessary environmental permits (e.g. waste management, transportation), approvals and registrations, and protect biodiversity and natural habitats wherever possible.
- 3.12.4. Supplier shall respect all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances. Hazardous chemicals and other materials included in products, especially those included in the substances of Very High Concern list of the REACH regulation, must be identified and managed by Supplier to ensure their safe use, recycling or re-use and disposal. The use of such chemicals and materials by Supplier must be avoided (and if not possible to avoid, minimised).
- 3.12.5. Supplier shall identify, minimise, monitor, control and treat all hazardous air pollutants and all emissions should be avoided in accordance with international standards and applicable laws.
- 3.12.6. Supplier shall understand the climate-related risks faced by their business, and report these publicly or to One NZ where relevant.

3.13. Greenhouse gas emissions (GHG)

- 3.13.1. Supplier shall where requested by One NZ identify, monitor and minimise Greenhouse Gas emissions (GHG) and energy consumption from its own operations including carbon emissions from transportation and travel. Where required, Supplier will provide relevant GHG data to One NZ or recognised third parties appointed by One NZ to measure emissions and implement reduction improvements.
- 3.13.2. We encourage Suppliers to work towards setting science-aligned climate goals, ideally communicated publicly, and an emissions reduction strategy to achieve them.

4. Speak up

- 4.1.1. Supplier shall report any instances of unethical behaviour or breaches of this Code (in relation to the goods and/ or services being provided to One NZ) in confidence using the 'Speak Up' contact details below. Supplier shall regularly promote these One NZ 'Speak Up' contact details (as may be updated by One NZ from time to time) and have them permanently available within Supplier's organisation and to any contractors or sub-contractors working on Supplier's behalf for One NZ.
- 4.1.2. Breaches of this Code can be reported by following the instructions outlined here: <https://secure.ethicspoint.com/domain/media/en/gui/74045/index.html>

10 Document History

Policy Owner:	Policy Champion:	Version:	Date:
Head of Procurement	Dylan Semmens	Version 1.2	18/03/2023

Version:	Date:	Changes made:	Approved by:
1.3	18/03/2023	Re-branded to one.nz	Rajat Sarna – Head of Procurement
1.4	28/08/2023	Updates to: <ul style="list-style-type: none"> • At a glance section – added overview of Supplier responsibilities • 3.10.2 - to include cobalt on the list of minerals • 3.11.7 - in reference to health & safety reporting • 3.12.1 - broaden scope of environmental protection outside of management systems • 3.12.3 - added reference to protecting biodiversity • 3.12.6 - added point on climate-related risks • 3.13.1 - edited details around required GHG emissions reporting • 3.13.2 - added reference to setting science-aligned targets 	Michelle Young-Interim CFO