

## SUPPLIER CODE OF CONDUCT

The purpose of this Supplier Code of Conduct ("Supplier Code") is to enable Fletcher Construction Holdings Limited and its subsidiaries ("Fletcher Construction") to purchase from suppliers who meet its expectations and requirements.

Fletcher Construction requires that all its suppliers ("Suppliers") have, hold and can demonstrate, the attributes required by this Supplier Code at all times. Suppliers must also ensure that their workers, contractors and consultants have, hold and can continually demonstrate compliance with this Supplier Code.

Fletcher Construction may vary this Supplier Code from time to time, the latest version of which shall be made available to you at [www.fletcherconstruction.co.nz](http://www.fletcherconstruction.co.nz).

### ATTRIBUTES

#### Applicable Laws

You conduct yourself in such a way to satisfy all applicable laws, act fairly, professionally and in an ethical manner. You also have adequate policies and procedures in place to monitor (and report upon request) the Attributes specified in this Supplier Code.

#### Labour and Human Rights

You support and respect the protection of internationally proclaimed human and labour rights and ensure that you are not complicit in human rights abuses, such that you:

- pay workers in a timely manner and provide fair pay and working conditions;
- do not use wage deductions as a disciplinary measure;
- ensure that your workers receive at least the prevailing industry wage or relevant award;
- pay or cover any commissions or other fees in connection with employment of migrant workers and do not charge or recover these fees from workers;
- do not retain original identification documents of your workers or prospective workers;
- require your labour hire providers to comply with the expectations set out in this Supplier Code;
- support freedom of association and the right to collective bargaining for your workers;
- do not use forced or compulsory labour, servitude, or be involved in any process or practice involving (directly or indirectly) trafficking in persons, debt bondage, forced marriage, prison labour or child labour, both within your operations or supply chain;
- do not engage in or support discrimination in hiring, remuneration and employment practices, including on grounds of race (including colour, descent, nationality or ethnic origin), religion, religious belief or activity, sexual orientation, gender, gender identity and expression, intersex status, pregnancy or potential pregnancy, marital/domestic status, family responsibilities or parental status, breastfeeding, physical features, political beliefs, industrial activity, union membership, irrelevant criminal record, age or disability (except where you are able to demonstrate an entitlement to do so by law);
- do not use violence, threats of violence or other forms of physical coercion, bullying, sexual and non-sexual harassment, victimisation or intimidation of any form; and
- promote equality of opportunity and treatment for all to help eliminate all active and passive forms of

discrimination, harassment, and victimisation throughout your activities and undertakings; and

- have a defined escalation process for reporting incidents specific to discrimination and/or harassment and take appropriate corrective or disciplinary action.

### **Anti-Bribery and Corruption**

You maintain business integrity at all times, such that you:

- adopt a zero-tolerance approach to bribery and corruption and conduct business with honesty and integrity, including the prohibition of facilitation payments; and
- preserve the confidentiality of information provided in confidence by Fletcher Construction; and
- disclose conflicts of interest that may impact Fletcher Construction; and
- have an effective set of policies and procedures which are at least at the standard set out in Fletcher Construction's Anti-Bribery and Corruption Policy.

### **Reporting**

You demonstrate transparency in the way you work, such that workers, contractors, suppliers and stakeholders are able to report suspected instances of unlawful, fraudulent or other unethical conduct without fear of intimidation or reprisal and are protected from victimisation.

### **Health and Safety**

You demonstrate ongoing commitment to health, safety and wellbeing, such that you:

- maintain a safe working environment for your workers, contractors, suppliers and consultants and anyone else affected by your operations (including Fletcher Construction personnel or other suppliers); and
- ensure that working hours and the physical or mental demands of your workplace do not pose a health and safety risk to your workers;
- ensure that your workers, contractors, suppliers and consultants understand and follow health and safety policies, standards and procedures that apply to your operations at all times; and
- advise us or our third-party auditors of the status of any ISO45001 certifications, or recognised equivalents, on request.

### **Environment**

You demonstrate ongoing commitment to protect the environment by reducing the environmental impacts associated with the performance of your contract with Fletcher Construction, such that you:

- have processes in place to assess and reduce the environmental impacts of those activities and prevent pollution;
- focus on the reduction of waste, energy and fuel use, and water consumption;
- promote the efficient use of sustainable materials;
- promote the efficient use of materials and resources;
- increase your provision of sustainably certified products and services where possible;
- promote the use of products that have circular end-of-life solutions;
- pursue greenhouse gas reduction initiatives and can report your greenhouse gas emissions of those

activities upon request;

- proactively advise us of biodiversity or GHG commitments you have made, and whether these apply to parts or across the entirety of your business;
- advise us or our third-party auditors of the status of any ISO14001 certifications, or recognised equivalents, on request.

### **Supply Chain**

You proactively review or audit and work with your supply chain to ensure your personnel and business partners comply with the expectations of this Supplier Code and are capable of demonstrating their compliance, upon request by Fletcher Construction.

### **FAILURE TO HOLD THE ATTRIBUTES**

Failure to be able to warrant that you have, hold or can demonstrate the attributes described in this Supplier Code may result in Fletcher Construction terminating its relationship or agreement with you.

Fletcher Construction reserves the right to undertake due diligence and/or risk assessments to verify your compliance with this Supplier Code and it expects suppliers to cooperate and provide supporting evidence as it may reasonably require, to monitor and review their compliance.