

GUIDELINES FOR CONDUCT FOR EMPLOYEES & DIRECTORS

Our Guidelines for Conduct reflect the way we do things at LPC, setting out the standards expected of everyone who works for the Company and provides guidance on things that matter to us. Please take the time to read, and apply the principles to the work you do every day.

LPC is committed to doing what is right and building a culture based on honesty, integrity, transparency, mutual respect and the freedom to speak up. The Guidelines bring together our policy principles and provides a working guide for employees to do the right thing when making decisions in our daily activities. We're working extremely hard to drive a high performance culture – part of this means thinking, acting and working consistently across the Company. LPC supports you to:

1. Serve our **customers** in the best possible way. They are the reason we have a job.

2. Take all reasonable precautions while at work to ensure your own safety, and the safety of your colleagues and all others on LPC property.

3. Support your **colleagues** to do their best work.

4. Deal with LPC **openly** and in good faith.

5. **Honestly** and **diligently** carry out your role to a high professional standard.

6. Act at all times in a way that promotes and **protects** the LPC business, reputation and relationships.

7. **Speak up** if you see something you don't think is right

8. **Respect** the Company, your Colleagues and the Environment.

9. **Comply** with LPC policies and procedures, which may be amended from time to time.

As LPC employees, we are all expected to 'do what's right' in our daily work and actions, acting safely, ethically and responsibly – taking pride in our actions and decisions.

In any situation you're not sure of, it may help you to ask yourself the following questions.

- What would a LPC customer or shareholder expect me to do in this situation?
- What would my reaction be if my conduct was reported in the media?
- Would my colleagues or Manager consider my behaviour appropriate?
- What impact might this have on LPC?
- Could I be fired if I do this?

If you are in doubt about what is acceptable conduct at LPC please check with your Manager, Supervisor or Foreman for guidance.

Behaving in a way that contradicts these Guidelines or your employment agreement, may be considered as a conduct issue and could lead to disciplinary action.

These Guidelines are a guide only and are not an exhaustive list of any issues that could become a conduct and disciplinary issue.

CUSTOMERS, SUPPLIERS, COMPETITORS AND STAKEHOLDERS

1 Customers

- 1.1 Take the steps that meet or exceed the expectations of our customers.

2 Competitors

- 2.1 Compete vigorously with competitors, but always with integrity, honesty and fair business practices.
- 2.2 We avoid making false or misleading statements about our competitors.

3 Commercial Transactions

- 3.1 Compete for and conduct commercial transactions ethically and fairly.

4 Supplier Selection/Conflicts of Interest

- 4.1 Use non-discriminatory practices throughout the supplier selection process.
- 4.2 Notify your Manager in writing of any situation in which your interests (or those of your family) may conflict with the interests of the Company.
- 4.3 Immediately disclose any financial interest (e.g. shares) in any actual or potential supplier or customer to your Manager in writing.

5 Improper Payments

- 5.1 Do not accept or give bribes, kickbacks, facilitation payments or any other illegal, secret, or improper payments, transfers, or receipts.
- 5.2 Make all payments, Koha or transfers of items of value openly and with the authorisation of someone with the

appropriate delegated financial authority.

- 5.3 Do not assist another individual or Company to act unlawfully or unethically.
- 5.4 Do not use a third party to avoid the prohibition against bribes, kickbacks, facilitation payments and other illegal, secret, or improper payments.
- 5.5 Pay all fees, commissions, and expenses to outside agents on the basis of proper billings, accurate recordkeeping, and reasonable standards for the services they have provided.

6 Gifts and Entertainment

We need to ensure we are never influenced by gifts or entertainment or other inducements. These actions can create conflicts of interest, or raise questions about our judgement.

- 6.1 Seek approval from Management and register gifts, hospitality and entertainment on the Gifts Register, regardless of size.
- 6.2 Avoid giving or accepting any gifts or entertainment during a tender process that would be perceived as preferential treatment or providing an unfair advantage.

7 Competition Laws

- 7.1 Conduct business in a way that complies with New Zealand competition laws and the competition laws of other countries in which we do business.

EMPLOYEES

8 Treatment of Each Other At Work

We are all responsible for ensuring that harassment and bullying doesn't happen at LPC.

- 8.1 Treat every employee, customer, vendor and others you meet in the course of work fairly, with dignity and respect in all your dealings.
- 8.2 Harassment (including language or conduct that may be derogatory, intimidating or offensive to others), bullying and intimidating behaviour (including repeated inappropriate behaviour that undermines someone's

right to respect at work), will not be tolerated in our workplace.

What this means for you is:

- Never be derogatory or abusive to or about others
- Never behave in a way that is unwelcome, intimidating or offensive, including threats, bullying, or any form of uninvited sexual attention or sexually orientated activity (including visual material) that makes another uncomfortable, annoyed, upset or distressed.

- Discourage others from engaging in this behaviour
- Take all harassment and bullying complaints seriously. Managers should immediately address behaviour or conduct that may be offensive.

See Human Resources fact sheet *About Discrimination and Harassment* for more information.

9. Diversity and Inclusion

We strive to create a working environment where everyone feels respected and valued. We will treat people fairly, with dignity and will pursue equality of opportunity and inclusion for all employees through our employment policies and practices. We value diversity of people and thought. We will recruit, select and develop our people on merit.

- 9.1 Actively seek, value and draw on the differing knowledge, perspectives and experience of our LPC community.
- 9.2 Be aware of cultural sensitivities when working with others (employees or customers).
- 9.3 Be inclusive in the language we use when communicating.
- 8.3 All other behaviour toward another that is prohibited in the [Employment Relations Act, 2000](#) or the [Human Rights Act, 1993](#), such as discrimination on the basis of gender, marital status, colour, religion, disability, gender, family status, employment status, age, race, political opinion, ethnic or national background.

9 Whistle-blower Policy

- 9.1 Report all unethical decision making and/or behaviour to your Manager, Supervisor or Foreman. The Company has a Whistle-blower policy designed to protect employees that disclose matters of serious wrong doing.

10 Safe Working Environment

Safety at LPC is a top priority. We are committed to achieving a zero harm work environment and instilling a culture of safety

and continuous improvement. Our safety management systems and quality processes are used to continually evaluate and improve our workplace safety performance.

See LPC's *Health & Safety Policy* on intranet.

11 Drug and Alcohol Policy

Alcohol and other drugs must never affect us in our work. Our safety, and that of our colleagues and customers, depend on it.

See LPC's *Drug and Alcohol Policy* on intranet.

12 Conflict of Interest

- 12.1 Do not engage in any activity, paid or unpaid, which affects your ability to keep to your Employment Agreement (unless you have prior written approval from your Manager).
- 12.2 If you participate in community activities, speak only for yourself and do not imply that you are speaking for or making commitments on behalf of the Company, unless you are authorised to do so by appropriate Company officials.
- 12.3 Directors should ensure their interests are communicated to Management at the beginning of their appointment and any changes are communicated to Management in a timely manner. Management is to ensure the interests register is kept up to date at all times.
- 12.4 Directors should excuse themselves from discussion in Board meetings and voting on any matters in which there is an actual or potential perceived conflict. This should be clearly recorded in the meeting minutes.

13 Confidentiality

We are committed to protecting confidential or personal information at all times, including that of our customers, employees and business partners. Personal information which can be used to identify someone must be handled responsibly and in compliance with all applicable privacy laws and only collected for lawful and specific business purposes.

- 13.1 In accordance with your Employment Agreement, avoid discussing

confidential Company business with anyone else who does not legitimately need to know the information.

- 13.2 Refer any outside inquiries regarding the Company to the person/s in the Company authorised to respond to the particular inquiry (see *Media Policy*).
- 13.3 Adhere to confidentiality agreements that we have with other companies, using all reasonable efforts to protect and safeguard such information.
- 13.4 Respect the confidentiality that new employees owe to their former employers.
- 13.5 Do not use any Company information for personal gain, except as permitted by law.

14 Environmental Compliance

We are committed to preserving and protecting New Zealand's natural environment for the future. We take responsibility for operating in an environmentally sustainable way.

- 14.1 Comply with all applicable environmental laws and regulations - environmental management is a high priority.
- 14.2 Carry out your work responsibilities in ways that minimise our impact on the environment and that conserve both energy and natural resources.
- 14.3 Do your bit to reduce, recycle, re-use and be energy efficient in your work environment.

- 14.4 Support Company environmental sustainability initiatives.

15 Copyrights

- 15.1 Respect copyright restrictions when using Company resources.

16 Company Property

Resources are provided to you to perform the requirements of your job. We must all use business resources responsibly and only for business purposes.

- 16.1 Avoid using Company property, equipment or facilities for anything other than Company business without prior permission of your Manager.

17 Company Standard for PPE

- 17.1 Personal Protective Equipment supplied by the Company must be available at all times and worn when required.
- 17.2 Personal appearance must be neat and tidy and particular attention paid to personal hygiene.

18 Personal Participation in Political Activities

- 18.1 Your personal participation in political activities must be separated from corporate activities.
- 18.2 Do not use the Company's name, property (including stationery) or work time in connection with such activities.

COMPANY

19 Shareholder

- 19.1 Work toward providing an excellent sustainable long-term financial return to our shareholders.
- 19.2 Work to protect and improve the value of our Shareholder's investment through prudent application of corporate resources.
- 19.3 Ensure all dealings with our Shareholder are fair, accurate and reasonable.

20 Accuracy of Financial Records/Financial Representations

- 20.1 Report all corporate transactions accurately and truthfully, including receipts, disbursements, and the nature and purpose of transactions.
- 20.2 Invoices, quotations, receipts and other statements reflecting charges, prices, product descriptions, terms or business intentions, must be complete and accurate.

- 20.3 Report all information/items that may lead to a later charge or credit in the financial statements – provisions (e.g. bad/doubtful debts, stock obsolescence), insurance events, assets/liabilities contingent on future activities.
- 20.4 Do not knowingly supply false or misleading financial information regarding the Company to any person.
- 20.5 Cooperate fully with auditors and under no circumstances withhold information from them.

21 Information

- 21.1 Ensure that you inform your Foreman, Supervisor or Manager of any information that you think is reasonable for them to know.

22 Responsible Citizenship

- 22.1 Lyttelton Port Company is committed to improving the community in which we operate and to being a responsible corporate citizen.
- 22.2 We will actively encourage initiatives designed to improve the community in which we live and work.