

Supplier Code of Conduct

I. PURPOSE

At Lyttelton Port Company Limited (LPC) we are committed to the highest standards of social and environmental responsibility and ethical conduct. We have an objective to maintain operational integrity and safety always and are committed to contributing to Canterbury and the South Island's success - socially, environmentally, and economically. We recognize the importance of minimizing the impact of our operations on the environment, by operating in a sustainable manner.

LPC seeks to engage, collaborate, and partner with suppliers (Suppliers) who share our commitment and approach to conducting business sustainably.

In addition to any contractual commitments, LPC expects its Suppliers to meet the minimum standards defined by this Code and to fully comply with all applicable laws and regulations when conducting business with LPC.

II. SCOPE

This Code outlines LPC's minimum expectations of all Suppliers (including all related entities and sub-contractors of Suppliers) providing goods or services to LPC.

Suppliers will be responsible for informing and educating their employees, agents and contractors on the expectations in this Code, verifying compliance with this Code and taking action in response to non-compliance.

III. CODE STANDARDS

Labour and human rights

LPC supports the protection of human rights and is guided by New Zealand law and applicable United Nations and International Labour Organisation treaties and conventions.

We expect Suppliers to adhere to international standards relating to human rights. Suppliers must respect the labor rights of their employees

in the workplace and monitor human rights within their supply chain.

LPC also expects Suppliers to at all times comply with New Zealand employment standards and maintain a workplace that is free from unlawful discrimination and harassment.

As a minimum, Suppliers must ensure:

- *Employees are not subjected to discrimination based on race, national origin, ethnicity, religion, gender, age, marital status, sexual orientation, disability, employment or family status, political opinion or any prohibited ground; and*
- *All goods and services supplied to LPC are manufactured and supplied under healthy and safe working conditions; and*
- *Only employees who are legally authorised to work in their facilities are employed. Suppliers shall be responsible for validating their employees' eligibility to work through appropriate documentation; and*
- *All employees meet the local legal minimum labor age permitted by the law of the country or countries where the performance, in whole or in part of the contract, takes place. Child labor is strictly prohibited; and*
- *Employees engaged in the manufacture and supply of goods and services are voluntarily employed, and under no circumstances is any form of forced, coerced, bonded, indentured, or involuntary labor or otherwise used; and*
- *All employees are paid a proper and competitive wage which meets their basic needs and provides discretionary income, and is no less than the minimum wage specified by local laws, where applicable; and*
- *Employee working hours, including overtime work, and the granting of leave of any form, are in accordance with applicable local and/or national laws; and*
- *Employees are not exploited or subjected to abuse of any kind, including psychological, physical, sexual, or verbal abuse, intimidation, threats or harassment; and*
- *Employees' rights to freedom of association and collective bargaining is acknowledged. Where these rights are restricted by law, Suppliers will not*

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hinder the development of alternative means of independent and free association and bargaining.

- *The privacy rights of all employees are respected whenever personal information is gathered or employee monitoring practices are in place.*

Health, safety and wellbeing

Suppliers must comply with workplace health and safety laws and regulations and maintain healthy and safe work environments.

Suppliers must integrate sound health and safety management policies, practices and systems into their businesses. They must be designed to promote the general health and wellbeing of employees, reduce work-related injuries and illness, and ensure the safety of all goods and services supplied to LPC.

Suppliers must make a copy of their health and safety policy available to all workers (and to LPC) and provide workers with appropriate workplace health and safety induction and training. Additionally, while at any LPC premises, all Supplier personnel must comply with LPC's "Our Health & Safety Policy".

Considering the risks identified with port operations, it is of particular importance to LPC to maintain an alcohol-free and drug-free working environment. Suppliers must comply with LPC's "Drug and Alcohol Policy"; and ensure their employees, agents and subcontractors are aware of this policy, maintain a zero blood alcohol level and remain drug-free at all times while providing goods or services to LPC or otherwise on LPC's premises.

Security

Suppliers must be aware of and comply with the Maritime Security Act 2004 and with all LPC access, security and identification policies and requirements whenever at any LPC premises.

Environmental protection

LPC expects Suppliers to share LPC's commitment to establish environmentally

responsible business practices and proactively improve their environmental performance. At a minimum, Suppliers must:

- *Conduct their business in accordance with all applicable laws and regulations regarding the protection and preservation of the environment, including those relating to hazardous materials, emissions, noise, pollution, waste and wastewater discharges; and*
- *Have an environmental policy that is proportionate to the environmental risk of their business operations; and*
- *Endeavour to reduce operational environmental impacts; and*
- *Actively support LPC's goal to establish transparency and traceability within all levels of LPC's supply chain and be willing to share information on the origin of products and components.*

Ethical business

All Suppliers must adhere to high standards of ethical conduct, comply with all applicable laws and regulations and refrain from engaging in any form of corrupt practices, including bribery, extortion, money laundering or other illegal, unethical or anti-competitive activities. Business dealings – with LPC and others - must be handled with integrity, transparency, and honesty. At a minimum, Suppliers must:

- *Comply with all anti-corruption, anti-bribery and anti-money laundering laws of the countries in which it does business, and not make any direct or indirect payments or provide any benefits or things of value, including bribes, kickbacks or other promises of payments to foreign government officials or other persons for the purpose of inducing the individual to misuse their position to obtain or retain business, receive improper benefits or other unfair or improper advantage; and*
- *Conduct their business activities in full compliance with all applicable competition, fair-trading and insider trading laws at all times; and*
- *Not improperly use personal, confidential or commercially sensitive information regarding any party in the supply chain or their personnel; and*

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- *Disclose any actual, perceived, or potential conflict of interest to LPC, including any employee or contractor of LPC who may have an interest or economic tie of any kind in the Supplier's business; and*
- *Be transparent about their ethical policies and practices*

Manu whenua (Land custodians)

Lyttelton Harbour (Te Whakaraupō) is of cultural significance to Ngāi Tahu. Tangatua Whenua relationships with Whakaraupō extend over many centuries.

LPC and Te Hapū o Ngāti Wheke share a long-term interest in Whakaraupō. We place a high level of importance on working together to fulfill our common responsibility as custodians and kaitiaki (guardians) of the Harbour. We are committed to strengthening our existing partnership, enabling future generations to realise the benefits through protection of Whakaraupō and its ability to provide for mahinga kai, cultural, social and economic wellbeing.

Suppliers must acknowledge, and ensure that their activities do not adversely impact, this important relationship between the kaitiaki and LPC.

Corporate social responsibility

LPC seeks sustainable outcomes from our procurement activities that meet today's needs and positively contribute to the future.

LPC expects Suppliers to look beyond price alone and consider their overall value proposition to LPC including wider social, economic and environmental outcomes.

In working with LPC, LPC encourages Suppliers to be good corporate citizens and contribute positively to their communities.

IV. APPLICATION OF THE CODE

Supplier compliance with this Code is a prerequisite in every LPC contract for supply. But the expectations set out in this Code are in addition to, and not in substitution for, the provisions of any binding legal contract between LPC and the Supplier.

LPC may monitor, verify and validate a Supplier's compliance with this Code from time to time, including through site and facility inspections.

Suppliers must maintain and be able to provide LPC with reasonable evidence of compliance with this Code promptly on request.

LPC recognises the importance of the conduct, standards and behaviors described in this Supplier Code of Conduct being observed throughout LPC's supply chain and is committed to both observing the standards defined by this Code itself and to dealing with Suppliers who also comply with this Code.

Enquiries regarding LPC Supplier Code of Conduct, should be directed to:

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