

Supplier Code of Conduct Policy

Document Number: EMS-POL-005

Document Rev: 1

Date: 6/08/2025



1. Introduction

D&H Steel Construction is committed to sustainable procurement practices that will ideally deliver improved outcomes for the wellbeing of all New Zealanders.

2. Scope

This policy applies to all D&H Steel Construction suppliers, contractors and persons conducting business on behalf of D&H Steel Construction. The rights, standards and terms set out in the Code are in addition to the terms of any contracts between D&H Steel Construction and its Suppliers and will prevail over those contracts to the extent of any conflict or inconsistency. Suppliers are responsible for communicating this Code to their relevant staff, ensuring compliance, and taking appropriate actions to address non-compliance.

3. Purpose

The purpose of this Code of Conduct is to confirm D&H Steel Construction's commitment to sustainable procurement and outline our expectations of suppliers in support of this commitment.

4. Living Standards Framework

We use the Treasury's Living Standards Framework to guide us on desirable procurement outcomes.

4.1 Financial and Physical Capital

D&H Steel Construction expects its suppliers to:

- Offer fair terms and affordable rates in any supply agreements.
- Pay their sub-contractors promptly.

4.2 Human Capital

D&H Steel Construction expects its suppliers to:

- Adhere to international human rights standards in their own workplace and monitor and address these standards within their supply chain. This includes the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and the International Labour Organisation Core Conventions.
- Comply with all New Zealand employment laws and regulations, including workplace health and safety laws and regulations.
- Maintain a workplace that is diverse and inclusive, free from unlawful discrimination, and is healthy and safe, including having policies that promote diversity and inclusion.
- Adequately protect people's privacy and security of all confidential data, information intellectual property provided by D&H Steel Construction.
- Invest in the development of its people.
- Ensure all workers are voluntarily employed, lawfully entitled to work and not under any form of duress, forced, coerced, bonded, indentured or involuntary labour.
- Not use child labour (a child being any person under 15 years or under the age for completing compulsory education or under the minimum age for employment under local law, whichever is greatest). This excludes students being offered part time work in a hazard free environment for work experience/ holiday job situations.
- Pay workers a wage that enables them to live with dignity and participate as an active citizen in society.
- Allow all workers to communicate openly with management regarding working conditions and human rights without fear of reprisals, intimidation or harassment.

4.3 Social Capital

D&H Steel Construction expects its suppliers to:

- Consider including local, Māori and Pacifica and other minority led businesses to deliver the services/contract.
- Conduct business with Māori that takes a Treaty (Te Tiriti o Waitangi) based approach, grounded in Te Ao Māori (Māori World View) to improve economic and wellbeing outcomes for Māori.
- Not engage in any form of corruption or fraud.
- Not offer or permit to be accepted or offered any kick-backs, bribes, favour, hospitality, entertainment, or any other means of obtaining or attempting to obtain undue or improper advantage regarding any business opportunity or service/product exceeding the value of \$50 unless approved by the D&H Steel General Manager.
- Manage their business with integrity in accordance with relevant law, regulations and ethical standards.
- Be transparent about their ethical policies and practices.
- Adhere to high standards of fair business, advertising and competition, including not engaging in any collusive price-fixing, price discrimination or other unfair trade practices in violation of application laws.
- Disclose any actual, perceived or potential conflict of interest to D&H Steel Construction
- Work collaboratively with suppliers, partners, customers and communities to deliver better outcomes

4.4 Natural Capital

D&H Steel Construction expects its suppliers to:

- Establish environmentally responsible business practices, services and products.
- Proactively improve their environmental performance and particularly take action on engaging with the circular economy.
- Conduct their business in accordance with all applicable environmental laws, permits, regulations and standards to mitigate impacts on, and protect, the environment.
- Minimise waste of all types, including water and packaging by practices such as modifying production, offsetting, maintenance, materials substitution, innovation, conservation, re-cycling, re-use and repurposing.
- Identify and manage chemicals and other materials, including air emissions, wastewater and solid waste, that might pose a hazard if released to the environment. This may include safe handling, movement, storage, use, disposal, recycling and reuse.

5. Non-Compliance

If D&H Steel Construction considers a Supplier is not complying with the Code, D&H Steel Construction may by written notice:

- Advise the Supplier of that non-compliance, in which case the Supplier must remediate the non-compliance to D&H Steel Construction's satisfaction; and
- Without any liability to the Supplier, immediately:
 - Suspend or cancel the Supplier's supply of any goods or services to D&H Steel Construction, including suspending the payment of any associated invoices, until that non-compliance is remediated to D&H Steel Construction's satisfaction; or
 - Terminate any or all of the Supplier's contract with D&H Steel Construction.

The rights set out in this section are in addition to any rights set out in the Suppliers' contracts with D&H Steel Construction.

Signed



Managing Director
D&H Steel Construction Ltd