



Supplier Code of Conduct

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This is an approved controlled document and is subject to change.

Please ensure you have the most up-to-date copy at all times.

INTRODUCTION

ETEL's vision is "BETTER ways to connect people to power". Central to the vision is strong relationships with our trusted suppliers. We are committed to sustainable, ethical and socially responsible procurement. We hold ourselves accountable to the highest industry standards, acting in accordance with our Procurement and Purchasing Policy, Code of Conduct, supporting standards and frameworks.

We expect the same high standards from all parties with which we have dealings, including suppliers. This is achieved through three areas: business ethics, good labour standards and a strong community focus. We're committed to working with you to identify in these three areas what is best practice, improvement opportunities and to drive mutually beneficial value.

We view our suppliers as valued partners and this Supplier Code of Conduct ('the Code') sets out our minimum expectations of your company and your supply chain in providing goods and services to our organisation and our customers.

ETEL requests that you and your employees, agents, suppliers and sub-contractors respect and adhere to the Code when conducting business. It is your responsibility to communicate the Code to its employees, agents, suppliers and sub-contractors and ensure they comply.

By accepting this Code, you acknowledge and confirm that you will adhere to and comply with the principles set out in this Code for all existing and future business relationships with ETEL. This Code is to be read in conjunction with any agreement with ETEL.

ETEL includes ETEL Limited (NZBN 9429032454673) and its subsidiaries including ETEL Services Limited (NZBN 9429048977241), ETEL Transformers Pty Limited (ABN 34 140 029 456) and PT Lucky Light Globalindo.

1. BUSINESS ETHICS

Honesty, integrity and fairness

You shall recognise the importance of honesty, integrity and fairness in conducting its business and follow transparent business processes with high standards of business conduct.

Compliance with laws and regulations

You must comply with the letter and spirit of all laws and regulations that affect business conducted with ETEL.

Fraud (including bribery and corruption)

You shall acknowledge that fraud, bribery and corrupt behaviour is unlawful. You must not offer, give, request or accept payments, payments in kind, bribes, 'kick-backs', secret commissions, gifts or favours of any kind that could be considered as influencing the party involved, creating any obligation or conflict of interest. There are certain types of gifts that should never be offered or accepted by you irrespective of value—these are: cash or cash equivalents, drugs or other controlled or illegal substances.

Privacy and information

You must respect the privacy of individuals and laws relating thereto, in particular, with respect to the collection, processing and management of personal data. The unauthorised use of confidential and/or personal information by you is prohibited.

Services and products

All services and products delivered by you must meet the quality and safety standards required by applicable law, be fit for the intended purpose and, where applicable comply with ETEL quality requirements.

Confidential information and Intellectual Property

You must ensure that ETEL confidential information is preserved and protected, and not disclosed to unauthorised parties. Information that is not normally available outside the

Company may only be used for authorised purposes. If you are uncertain about whether information may be disclosed, then guidance can be obtained from the relevant ETEL manager. Also, you do not use the Intellectual property of another party without their prior written approval.

Risk Management and Communication

You will identify, understand and manage risks and must make ETEL aware of any significant incidents, risk to delivery or behaviour that may affect our reputation.

2. LABOUR STANDARDS

Working environment

You shall provide a safe, secure and healthy work environment for your employees, contractors and visitors and ensure that this is supported by adequate safety programs in accordance with applicable laws and regulations.

Non-discrimination

You shall not discriminate in hiring and employment practices on the grounds of criteria such as race, creed, disability, gender, marital status, religious or political beliefs, age or sexual orientation.

Compensation

Your employees must receive compensation and benefits that comply with applicable laws and, where relevant, with binding collective agreements, including those pertaining to overtime work.

Working hours

You must ensure that your employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.

Freedom from harassment

You shall ensure a work culture that affords your employees the opportunity to work without fear of violence, intimidation, reprisal or harassment.

Anti-slavery

You must not engage in any form of modern slavery such as human trafficking, slavery, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour and must ensure, to the extent you are able, that your suppliers do not engage in any form of modern slavery.

3. COMMUNITY FOCUS

Environmental Compliance

You must manage your operations in an environmentally responsible manner and ensure compliance with related laws and regulations.

Environmental Impact

You will consider the impact of your business activities on the environment and monitor environmental performance with the aim of continuous improvement over time.

Ethical Sourcing

You will exercise due diligence to assure that all goods produced are free of conflict minerals and do not directly or indirectly support organisations and individuals associated with human rights abuses, terrorism or any illegal activity.

GENERAL

Compliance

ETEL reserves the right to verify your compliance with the Code through audits or other means. Should ETEL find that you do not comply with the Code, ETEL reserves the right to demand corrective measures and/or terminate its business relationship and related contract(s) with you.

Emergency preparedness and business resilience

ETEL expects its suppliers to have adequate emergency preparedness and response plans for safeguarding their employees, operations, and security of supply in times of natural events, major catastrophe and unforeseen events.

How to raise a concern

Should you have any concerns about how the Code is being applied, you should immediately raise this with the relevant ETEL manager or an independent senior manager of ETEL in the first instance. If the response received is not adequate or there is suspicion that a manager may be involved in improper conduct, the concern can be raised confidentially or anonymously by email to internalauditandfraudcontrol@ETELtransformers.co.nz

Please return a signed copy of this document confirming adherence.

Supplier	legal	entity
_____	_____	
Supplier	address	
_____	_____	
_____	_____	
Name	_____	
_____	_____	
Title	_____	
_____	_____	
Signature	_____	
_____	_____	
Date	_____	
_____	_____	