

SUPPLIER CODE OF CONDUCT

Leighs Construction Limited (**Leighs**) is dedicated to ensuring its business activities are conducted in an ethical and responsible way and endeavours to uphold high standards of behaviour itself and throughout its supply chain.

This Code of Conduct (**Code**) sets out the expectations Leighs has of its subcontractors and suppliers (**suppliers**), and Leighs requires that its suppliers meet the standards set out in this Code. This Code applies in addition to the provisions of any contract in place and may be updated from time to time.

By undertaking work for Leighs, suppliers agree to comply with the Code and further agree to provide evidence and confirmation of compliance if requested to do so by Leighs.

Leighs is committed to supporting its suppliers to meet the requirements set out in this Code and will work with suppliers to exchange expertise, promote best practice and to provide support to suppliers, where required.

As part of doing business with Leighs, it expects its suppliers to:

Compliance with the Law

- Comply with all applicable laws and regulations in the jurisdiction in which they operate.

Ethical Behaviour

- Behave and conduct activities with integrity and honesty.
- Comply with all applicable ethical standards.
- Be transparent about ethical policies and practices.
- Not engage in any form of corruption or bribery and ensure that it has systems and procedures in place to mitigate against the risk of such behaviour.
- Avoid actual or perceived conflicts of interest and not take any action to obtain any unfair or improper advantage.

Labour and Human Rights

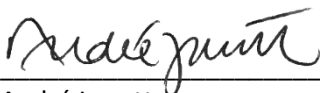
- Respect human rights of workers and adhere to international human rights standards in the workplace.
- Maintain a workplace that is free from unlawful discrimination, harassment, bullying or other abusive behaviour.
- Comply with all New Zealand employment standards.
- Monitor, identify and remove any incidence of modern slavery (including but not limited to forced labour, bonded labour, servitude, slavery, child labour, human trafficking, and deceptive recruitment practices) in its supply chain and provide employees and supply chain partners with access to whistleblower mechanisms.
- Operate in a way that respects and supports diversity, inclusion, and equality in its organisation.

Health, Safety and Environment

- Comply with workplace health and safety laws and regulations, and any applicable industry-specific requirements, and any project specific requirements.
- Provide and maintain a healthy and safe work environment and minimise all health and safety risks.
- Conduct business in a way which mitigates the impact on, and supports the protection of, the environment.
- Demonstrate commitment to improving environmental sustainability and reducing environmental impacts.
- Identify opportunities to reduce and recycle materials where possible.

Security

- Comply with any security requirements Protect information, data, assets, tools, and other materials provided and promptly return these if requested.
- Utilise up to date technologies, processes, and procedures to mitigate cyber and security threats and if any incident occurs, review and update practices to prevent any future events.
- Maintain a business continuity plan which enables the continuing operation of critical business functions in the event of a crisis.



André Lovatt

Chief Executive Officer