

Supplier Code of Conduct

February 2023



Introduction

Craigs Investment Partners and its subsidiaries and affiliates (CIP Group) operate in a specialised and highly regulated market, where a high degree of trust, ethics and good conduct is essential to provide the best possible outcome for clients. As such, CIP is committed to operating in a responsible and sustainable manner. Our sustainability programme integrates environmental, social and governance factors into our strategy and business operations.

An important contributor to the continuity and sustainability of our business is the trusted relationships with third party suppliers and service providers (together "Suppliers") who deliver a range of important products and services to CIP. Therefore, CIP is committed to working with its Suppliers to ensure environmental, social and governance standards are maintained throughout the CIP supply chain, in a manner consistent with this Code.

Purpose

This Code sets out the minimum standards of conduct expected from suppliers to CIP Group. Supplier adherence to this Code is an important part of ensuring the wider CIP business operation continues to operate ethically and responsibly, and in alignment with CIP Group sustainability objectives.

Principles

This policy is based upon the following CIP values and principles:

Our Values	Policy Principles
We put people first	We exceed minimum labour standards, including providing a work environment and systems of work that are healthy and safe. All people involved in or connected with our business activities are treated with respect and professionalism.
We are stronger together	We promote a work environment that is diverse and inclusive and free from unlawful discrimination, harassment, bullying or other forms of inappropriate conduct. We actively involve employees in decisions that might affect their health, safety, and wellbeing.
We strive for excellence	Operating with good conduct is a shared responsibility and is a critical means by which we deliver the best possible outcomes for clients.
We do what's right	We advocate honest, responsible, and ethical conduct in carrying out our business, including complying with all relevant legal, regulatory and ethical standards. We take steps to minimise our environmental footprint, and to have a positive impact on the communities in which we operate.

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Scope

This Code is applicable to all Suppliers to Craigs Investment Partners Limited and its subsidiaries and affiliates (CIP Group).

Requirements

Human rights and anti-modern slavery

Suppliers must uphold the human rights of workers employed or contracted, both directly and indirectly through the supply chain. Specific requirements in relation to child labour, forced labour and modern slavery are set out below.

Child labour

Suppliers must not engage in practices involving the employment of children below the age of compulsory education, or subcontract to organisations who engage in child labour. Suppliers must also abide by all domestic and all international standards including International Labour Organisation (ILO) standards relating to the employment of persons under the age of 18.

Forced labour and modern slavery

Modern slavery and the exploitation of workers is a violation of fundamental human rights. Suppliers are responsible for upholding freedom, fairness and dignity for all workers engaged in their extended supply chain. All work must be conducted on a freely chosen basis, without threat of penalty or sanctions. The use of forced labour, debt bondage, indentured labour, prison labour or the trafficking or slavery of persons is prohibited. All workers must be free to end their employment with reasonable notice, and without threat of penalty or violence.

Ethical business practices

As a financial services provider CIP is a participant in global efforts to detect and prevent fraud, corruption, money-laundering, and funding of terrorism and criminal activities. It is essential that all suppliers to CIP Group commit to upholding the highest ethical standards in all aspects of their business operations. Suppliers are expected to conduct themselves in an equally ethical and fair manner, free from unfair advantage, or any other behaviour that may cause CIP Group financial loss or damage. In particular, suppliers are expected to:

- Conduct their business activities with integrity and to a high ethical standard.
- Conduct business activities in accordance with applicable laws and regulations of the country where they are doing business. This includes but is not limited to laws relating to competition and fair trading, insider trading, employment law, anti-money laundering, occupational health and safety and environmental laws and regulations.
- Not engage in any form of corruption including bribery, facilitation payments, extortion, money laundering or other illegal or unethical conduct.
- Avoid doing business with sanctioned people, businesses and countries.
- Have policies and procedures to prevent fraud, bribery and other corrupt activities occurring in their workforce and supply chain.
- Act fairly and ethically in their treatment of their own Suppliers.

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Conditions of employment

Suppliers must uphold fair and responsible employment practices in keeping with applicable employment laws and standards. Specific expectations include:

- Employees are to be compensated in accordance with all applicable domestic wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.
- Working hours are to be limited to within legally accepted maximums, including overtime, and suppliers must ensure employees are afforded at least one day off per seven-day-week.
- Convey all relevant employment terms and conditions to employees clearly in a written employment agreement, the form and content of which must comply with relevant domestic employment laws.

Health and safety

Suppliers are expected to comply with all relevant health and safety legislation and standards. In particular:

- Providing a safe and healthy work environment for employees, visitors and third parties, by managing risks to health and safety and employing safe systems of work.
- Ensure all welfare facilities and amenities provided in the workplace are hygienic, safe and meet the needs of workers.
- Provide appropriate training to employees and contractors in safe work practices for the type of work being performed.
- Implement suitable and sufficient procedures for responding to and managing emergencies, and for the thorough investigation of health and safety incidents.
- Upon request, provide CIP with evidence of compliance with health and safety laws and standards and findings of incident investigations.

Freedom of association and collective bargaining

Suppliers shall respect the rights of employees to join or not to join trade unions or similar representative bodies and the rights of employees to engage in collective bargaining to the extent permitted by law.

Suppliers are expected to encourage and support open communication and direct engagement between workers and management on workplace issues without fear of reprisal, intimidation or harassment.

Diversity and inclusion

Suppliers are encouraged to foster supportive, fair, diverse and respectful work environments.

Suppliers must not engage in or tolerate any form of discrimination or harassment on the basis of a characteristic prohibited by law such as age, race or colour, ethnicity or national origins, gender, sexual orientation, disability, religious or ethical belief, marital or family status, political opinion, or involvement in union activities.

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Environmental management

Suppliers are expected to uphold environmental management principles and deploy measures within their business operations that prevent and reduce harm to the environment.

Suppliers must comply with all applicable environmental laws and regulations, including obtaining and maintaining all necessary environmental permits, approvals and registrations required in the country of operation.

If requested, Suppliers must provide CIP with data in relation to the suppliers Scope 1 and Scope 2 CO₂e emissions, in a format that will allow CIP to calculate its Scope 3 value chain emissions.

Privacy and confidentiality

The correct management of private and confidential information is critical to importance to CIP Group maintaining the trust and confidence of its clients.

CIP Group expects Suppliers to protect all information that CIP Group or its clients may share with them, or which CIP Group Suppliers have access to through their work with CIP Group. Confidential information and intellectual property rights must be protected in accordance with applicable legal and regulatory requirements, and contract terms.

Suppliers who have access to confidential CIP Group information, or CIP Group client information must have appropriate measures to protect the information against loss, unauthorised access and unauthorised use. Suppliers must notify CIP as soon as possible upon becoming aware of any such loss, unauthorised access or unauthorised use.

Treatment of Suppliers

Suppliers are to ensure that supply chain activities do not adversely affect CIP Group or the communities in which CIP Group operates. In particular, they must treat other suppliers and subcontractors throughout the value chain in a fair, safe and ethical way, such as providing timely payment and reasonable contractual conditions.

Business continuity

The ability for CIP to maintain service delivery is critical to CIP clients and contributes to the successful functioning of New Zealand's capital markets. As part of CIP business continuity planning, CIP has identified Suppliers that are deemed critical. Critical Suppliers will have specific contractual requirements, and annual business continuity testing and BCP readiness attestation is a requirement for these Critical Suppliers.

All Suppliers to CIP Group (whether deemed critical or not) must ensure they have identified potential emergency situations that may impact service delivery to CIP and have suitable and sufficient risk management controls and measures in place to minimise harm to themselves, their customers and their supply chains in order to maintain business continuity.

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Monitoring and reporting

Reactive Compliance

In the event of a supplier, contractor or employee failing to comply with the provisions of this code, it is important that CIP is made aware of the alleged breach, so the matter can be properly investigated and addressed.

Proactive compliance

As a condition of doing business with CIP, all Suppliers are required to:

1. Upon receipt of the Code confirm compliance within 20 Business Days using the Form attached as Appendix 1 to the Code. (Note: add in a form as an attachment to the Code)
2. Provide an attestation of compliance on annual basis (Note in a format requested by CIP- maybe use Smartsheet form)
3. Upon 15 Business Days' notice agree to an annual spot audit of your supply chain and compliance with the Code.

Whistleblowing

Suppliers are expected to help CIP succeed and to promote our values and high professional standards, including our commitment to do the right thing by our clients, regulators, shareholders, employees and the community. To help meet this expectation, CIP fosters an environment where our suppliers can raise concerns about any actual or suspected breach of this code or actual or suspected misconduct within CIP or CIP Group.

Suppliers, their employees and subcontractors can raise concerns with their CIP relationship point of contact.

Policy Control

Policy Details

Owner (Name, Title, Business)	Dave Armstrong, Procurement Manager, Head Office
Entities this Policy is Applicable to:	CIP Group
Approval	Audit & Risk Committee
Contract Enforceable	No
Renewal Cadence	Every two years
Next Review to be no later than:	20 February 2025

Review Log

Date	Review Action	Liaison Points
Dec 2023	Establishment of the Policy	Strategy