

SHAREHOLDER CODE OF ETHICS

POLICY

NZPM Co-operative Limited (NZPM or the co-operative) requires all shareholders joining the co-operative to adhere to this Code of Ethics.

This Code of Ethics specifies the business and personal standards and ethical considerations for Shareholders in conducting business or other interactions with the co-operative including the following:

1. Shareholders must act honestly and in good faith in all dealings with NZPM.
2. Shareholders must deal with the co-operative in a lawful manner and with a high standard of commercial and personal integrity.
3. Shareholders will demonstrate fairness, integrity and respect toward all NZPM team members and support NZPM to promote an inclusive work environment free from harassment and bullying.
4. Shareholders will support NZPMs desire to attract and retain skilled and highly capable NZPM team members.
5. Shareholders will not engage in any actions or behaviour that, if made public, could bring NZPM into disrepute.
6. Shareholders must seek to avoid conflicts of interest (including perceptions of conflicts of interest) in their dealings with NZPM. Where these do arise, Shareholders will declare and manage them in accordance with legal requirements and a high standard of integrity and judgement.
7. When dealing with NZPM, shareholders must comply with the NZPM health and safety policy and support and foster a strong culture of health and safety across the business, with customers and suppliers.
8. Other than in the normal course of business, shareholders will not take for themselves any opportunity discovered through the use of NZPM property, information or position, or use NZPM property, information or position for personal gain.
9. Shareholders will maintain and protect the confidentiality of information of, or held by NZPM, except where disclosure is allowed or required by law or a relevant regulatory body or the information is otherwise in the public domain.

DEFINITION

NZPM means NZPM Co-operative Limited, Plumbing World Limited, Metrix Imports Limited, NZPM Properties Limited and their associated brands.

Team members includes NZPM employees, contractors, people seconded to NZPM, directors, board members and volunteers.

Shareholder means the legal person or entity including the directors and owners of these entities who hold any class of share issues by NZPM Co-operative Limited.

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NON-COMPLIANCE WITH POLICY

Non-compliance with this policy will be taken seriously.

Any perceived non-compliance with this policy will be considered by the board of NZPM (excluding the Shareholder concerned) after taking into account the circumstances of the matter including representation from the Shareholder concerned.

The board may take any appropriate and reasonable action that they determine.

POLICY APPROVAL AND REVIEW

Reviewed by: Compliance Committee – 26 March 2025

Approved by: NZPM Board – 27 March 2025

Next Review Date – March 2028