

OUR
*code of conduct
and ethics*





a message

FROM OUR CEO

Here at NZPM Co-operative we've been in business since 1964 and we've grown significantly over the ensuing years. We now have our Plumbing World stores supporting plumbers and builders from Kerikeri to Invercargill and everywhere in between, along with our high-end luxury bathroomware company, Metrix. We don't just sell world-class plumbing, we form strong relationships with our people, customers, suppliers, and local communities who know our people. Our frontline businesses are supported by our two distribution centres and significant support teams. We know that it is all our people that give our company an edge, a real heartbeat within our industry.

We've grown stronger over the years, and we have been successful due to holding strong to our core values, behaving ethically, and remaining faithful to our roots. Our journey needs to be a sustainable one, in all senses of the meaning. We are passionate about treating people with respect and creating positive, healthy and safe experiences and environments for all the people that engage with us: employees, customers, suppliers, and locals across Aotearoa New Zealand.

We continue to respect the environment and continually seek ways to protect and preserve our planet for future generations.

As the current guardian of the co-operative, I take great pride in ensuring that we keep these values at the forefront of decisions that we make, and this Code of Conduct and Ethics will help you to understand how important our values and ethical behaviour is to us. It will guide you on how to behave and with the decisions you make on your journey with us.

Rob Kidd
NZPM CEO

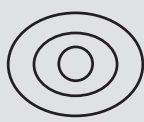
our vision

NZPM

Our Cooperative vision is to help our members be successful and we are committed to driving the ongoing success of all our people.

pw

New Zealand's number one plumbing merchant by choice.



We want our customers to love our products as much as we do.

WE MEASURE THIS SUCCESS THROUGH:

- People choosing us — to work for, to work with, to invest with, and to shop with. We want people to make the choice to come to and stay with us.
- Our ability to reward our people — through competitive pay, benefits and working environments, shareholder dividends and rebates, fair pricing and quality products, outstanding and trustworthy after sales care.
- Being socially responsible — we take responsibility for our actions and for leaving a positive impact on the environment as well as on our employees, our customers, our communities, and other stakeholders.



our code of conduct and expectations

DO THE RIGHT THING. WHEN FACED WITH CHOICES, ESPECIALLY DIFFICULT ONES, CHOOSE TO DO THE RIGHT THING.

We strive to achieve the highest standards of integrity, professionalism and personal achievement. The responsibility for this rests with each and every one of us. The Code of Conduct reflects and reinforces this.

WHAT YOU CAN EXPECT FROM US:

- A safe and inclusive working environment.
- A commitment to provide the appropriate resources for staff to do their job efficiently and effectively.
- Clear communication and feedback.
- Support and coaching.
- Joint goal-setting to achieve our company objectives.
- Care for your well-being.
- Support in achieving your goals

HOW YOU CAN CONTRIBUTE:

- Doing the right thing. When faced with choices, especially difficult ones, choosing to do the right thing.
- Complying with any laws relating to tasks you are undertaking such as driving.
- Following lawful and reasonable instructions
- Arriving on time and ready to work, devote your work time to working.
- Not wasting company resources.
- Performing your role to the best of your abilities.

WHAT WE EXPECT FROM OUR STAKEHOLDERS:

- Treating our people with respect and courtesy.
- Complying with all relevant legislation and/or policies that govern us and the way we operate.
- Respecting the co-operative and not disparaging or defaming it, or our people, at any time.



our values

WE BELIEVE NO MATTER HOW SMALL A PART OF THE GLOBAL COMMUNITY WE ARE, WE WILL BE A GOOD GLOBAL CITIZEN. WHERE POSSIBLE, WE STRIVE TO ENSURE OUR INVOLVEMENT IN GLOBAL MARKETS IS ALIGNED WITH OUR VALUES

PLAY AS A TEAM

We take responsibility for part we play in the team by treating everyone with respect, communicating with honesty and openness and caring for each other's wellbeing.

In New Zealand: We work with other co-operatives and professional bodies to achieve the best outcomes for our members and customers. We support charities to raise valuable funds and awareness.

Locally: We help our communities with foodbank appeals, supporting local sports teams and fundraising events.

At work: We treat people with dignity and respect regardless of their gender, culture, religion, age, race, sexual orientation or disability.

GO FOR THE GAP

We push ourselves to go for the gap by improving, growing and adapting ourselves so we are prepared for what tomorrow brings.

In New Zealand: We continually strive to improve our carbon footprint. We contribute to delivering sustainable, safe and excellent product and service solutions.

Locally: We build and maintain relationships with our local plumbers and builders. We recruit and develop local talent whenever possible.

At work: We continually look for ways to improve what we do and how we do it. We believe that our people make the difference.

EVERY MOMENT COUNTS

Our customer focused approach is at the heart of everything we do. We do this through providing quality products, expert solutions and excellent service for our customers and each other.

In New Zealand: We actively search international markets to find great products for our customers. We hold regular shareholder updates and provide training/information sessions to support our shareholders in running their businesses. We source and invest in new technology to help our customers and shareholders transact smoothly with us.

Locally: We listen to our customers to find out what they want from us. Our customers vary from region to region and we know what to do to meet their needs.

At work: We are committed and passionate about making it easier for our customers to do business with us.

CUSTOMER FOCUSED

We make the most of every moment to achieve great results for ourselves, our team, our customers and our business.

In New Zealand: We engage with international suppliers and plumbing merchants to stay up to date with global trends as they happen. We keep our eyes and ears open to opportunities as they arise.

Locally: We engage with our people - customers, shareholders, and employees regularly to ensure we understand the mood of the business.

At work: We encourage our staff to be flexible and proactive by responding appropriately to all situations.

Living well in a safe & healthy environment



We are committed to providing an emotionally and physically safe and healthy environment for all employees, customers, contractors and visitors to our sites. Our philosophy is that everyone has the fundamental right to return home in at least the same condition as they arrived that day. We believe that a healthy workplace must be a respectful one free from physical and psychological harm.

Health and Safety is a shared responsibility, and we expect everyone to help prevent themselves and others from being harmed and to actively contribute towards building a strong safety culture. We never walk past something that's not right; we fix it, or we report it.

We view health and safety as a Positive Obligation, it means that we expect you not to ignore any problem, a hazard or, workplace bullying/ discrimination if you witness it. Health and Safety is everyone's business, and we expect all our people to step up and be pro-active in this.

We understand that in today's world there are times it may suit people to work from home and, where possible, we support this. We expect that if you are working from home you will undertake a reasonable degree of care to ensure that the environment is safe and free from hazards. There is a high level of trust involved when people work from home and we expect that you will respect this and do the right thing.



We know that safe workplaces are ones that are free from illegal drugs, where prescription drugs are managed and where alcohol is handled responsibly. This includes when you are working from home. In line with this, we require all our people to undergo pre-employment testing and testing for cause or after an incident. Our expectation is that you will take part in this and understand the importance of this when creating a safe environment.

From time to time unfortunately people do get injured either at work or during personal activities. If this happens to you we will work alongside you and your healthcare provider to ensure that your return to work is safe and timely. We expect that you will be active and work with us in this endeavour.

If you are sick we require you to remain away from work.

inclusion and belonging



We believe that the working environment should be an inclusive one, and that people should be free from divisive or discriminatory attitudes or behaviour.

We want our people to feel included and experience a positive sense of belonging. We know that this comes from all levels and areas of the business. We expect that you will contribute to this by behaving in an inclusive and respectful way to your fellow employees, customers, and other stakeholders.

We expect our customers, shareholders, and any other stakeholders to treat you with respect. Should you be aware of any stakeholder who needs to be reminded of this at anytime please speak to your manager.

You can expect that we will support you in this and hold those whose behaviour does not align with this expectation to account.

There is no place in our business for harassment or unlawful discrimination. Harassment or unlawful discrimination of co-workers, customers, or suppliers is unacceptable and will not be tolerated. Incidents or reports of bullying and/or harassment will be investigated.

Our policy sets out the actions and behaviors that could be considered harassment or unlawful discrimination and how NZPM may respond.

From time to time you will be invited to take part in anonymous engagement surveys.

We love to hear feedback on how inclusive our people think we are and we encourage you to share your experiences with us.



privacy

We collect private information from customers, suppliers, and employees. Employee information is in the form of personal and payroll records. You are able to access the information that we hold about you at anytime. You are also able to request that information is corrected or amended if necessary. We will not hold information about you unless we consider it to be relevant to your relationship with us.

We have a formal procedure for investigating and dealing with privacy complaints. Once the Privacy Officer receives a complaint the Privacy Officer will commence an investigation.

If a breach is found, the Privacy Officer will escalate the matter to management so that the process can be rectified to prevent any further breaches from taking place. We will also contact you to inform you of the outcome of the investigation.

Complaints and requests will be treated confidentially.

You can contact our Privacy Officer by email at privacy@nzpm.co.nz or by post at: Privacy Officer, NZPM Group Limited, PO Box 137 151, Parnell, Auckland 1151.

technology and digital communications

We use technology in many ways across our business. We are continually looking for ways to grow our business and support our people and our strategic goals using digital technology.

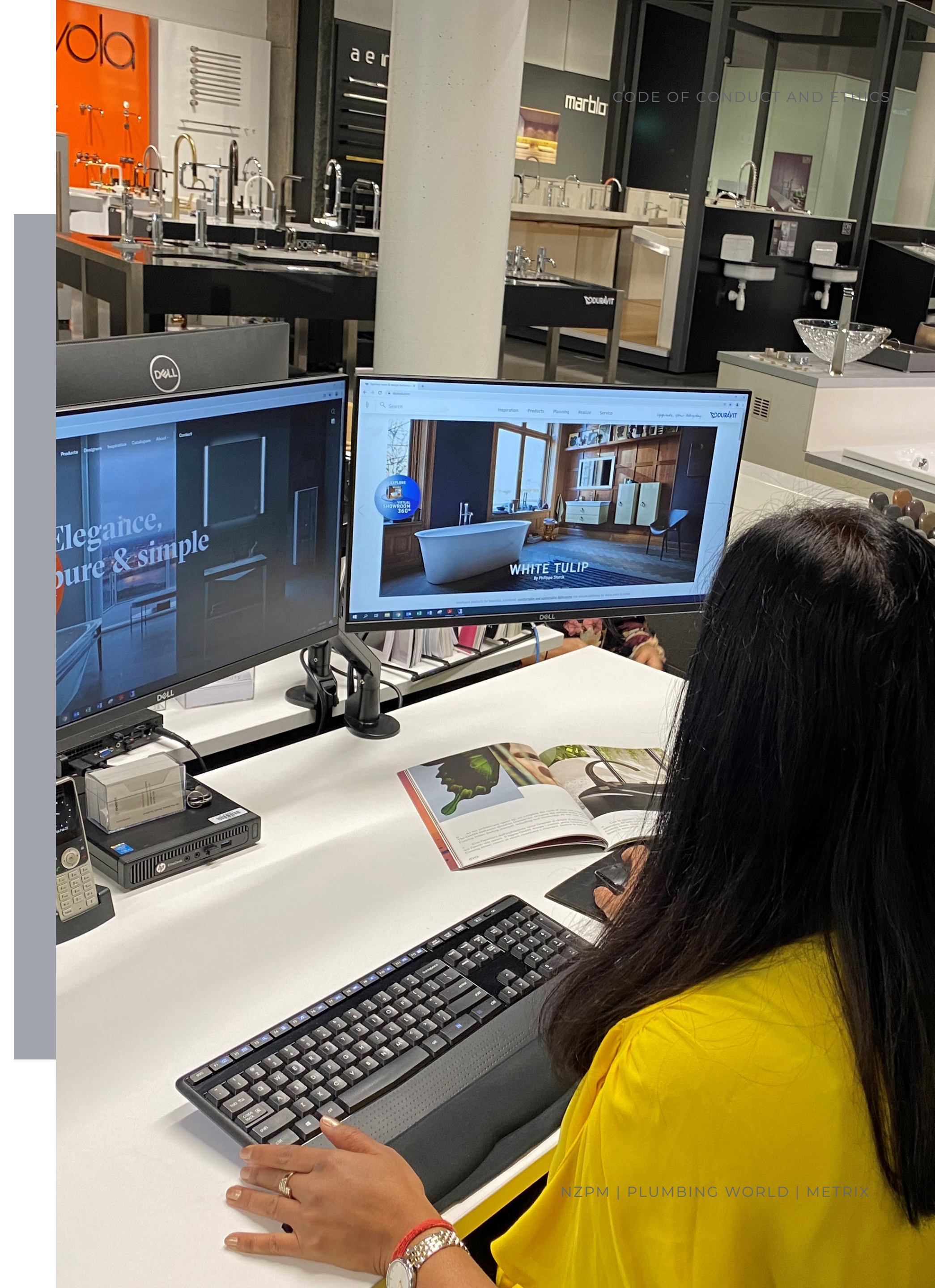
We expect that you will behave in a legal, responsible and ethical way when using our devices, networks or when identifiable as an NZPM employee. Our technology or company devices are not to be used for accessing objectionable material, gambling, or any form of unacceptable activity.

Be mindful when using social media. If you are readily identifiable as an employee of ours then you must take care not to share any content, opinions, or engage with platforms or people, or act in a way that risks harming our reputation.

Do not create any content about NZPM or our subsidiaries without express permission.

We understand that if you have a company device you will use it for personal business from time to time and this is acceptable, providing that this is not excessive.

You are responsible for any devices that are allocated to you. We expect that you will use them in line with this code and do what you can to protect them from, among other things: damage, hacking and/or theft.





nzpm in public or in the media

The CEO is authorised to make comments to the media on behalf of NZPM. If you are asked to make a comment to the media then you should explain that you are not able to do so, ask the person asking for their contact number and what their deadline for comments is, then pass this to the CEO.

No media are allowed onsite in the event of a major incident or crisis unless permission is provided by the CEO.

You should not post any pictures or statements relating to NZPM, Plumbing World or Metrix without specific authorisation from a member of SLT. You can re-share posts that have been published to our dedicated social media platforms, but to avoid any issues do not create any content.

In your role you may become privy to exciting new developments or product that we are sourcing. You must not share any information about NZPM, Metrix, Plumbing World, our clients, suppliers, customers or other employees on any social media sites without express permission from a member of SLT.

If you choose to identify yourself on social media as being associated with NZPM then your online activities must reflect our values and not bring NZPM into disrepute.



ethical product sourcing

Ethical product sourcing is a broad commitment where we will continually strive to advance social, environmental, and ethical responsibility beyond our own operations and into our supply chain.

We have established guidelines to support our position that we will only source products from responsible suppliers.

We are progressively working with all our suppliers to establish procedures that allow us to verify that each supplier is in compliance with our responsible sourcing guidelines.

For products that we source directly, we are taking responsibility to apply at least the same standards that we expect of our suppliers

A significant component of ethical sourcing is our commitment to our modern slavery policy which is committed to help prevent, mitigate and where appropriate, remedy modern slavery in our supply chains.

gifts and entertainment



We support proportionate and reasonable giving and receiving of gifts as part of normal business practice. Gifts includes all gifts, koha, prizes (of any type), entertainment, hospitality and related benefits that are provided without payment of full value to the recipient.

We know that there can be a fine line between what is acceptable and what is unacceptable or could be perceived as a bribe or inducement and to ensure that our people avoid this we have clear rules in place.

- Employees' one over one manager must approve gifts under \$150.
- Gifts over \$150 must be approved by a member of SLT or Regional Manager; and
- Gifts of \$500 or more must be approved by the CEO or CFO.
- Generally, directors and employees should not accept gifts, hospitality, entertainment that exceeds \$500 in value but if they are approved and accepted then they must be entered in the Gifts Register.
- Never ask or suggest that a customer, client, supplier or job applicant provides you with a gift or entertainment or any other inducement.

whistleblowing, protected disclosures

We encourage the disclosure of serious wrongdoing as a means of managing risk and protecting the Company's interests. We will protect employees who, in good faith, disclose serious wrongdoings. If you have concerns then the following applies:

- You should report these concerns either directly to your reporting manager or to the Human Resources Manager, Chief Executive Officer or Chief Financial Officer.
- You must genuinely believe that the information is true or likely to be true; and,
- That you want to disclose the information so that the serious wrongdoing can be investigated; and
- Indicate that disclosure is to be protected.
- Please note that malicious, frivolous or complaints made in bad faith complaints will not be investigated and may result in disciplinary action.



conflict of interest

Conflicts of interest occur when a personal or business interest or obligation do, or could, conflict, or be perceived to conflict, with their obligations to NZPM. It means that their independence, objectivity, or impartiality could be questioned.

- Conflict includes conflicts of commitment and conflicts of interest.
- Our people are expected to act in an open and honest manner and to ensure that there is no actual or perceived conflict between their personal or other interests and their NZPM duties and obligations.
- All conflicts are to be recorded in the NZPM conflicts register and individuals are responsible for ensuring that they disclose any actual or potential conflicts. This includes your family members or associates.

our people

We are committed to creating a culture that promotes and values diversity at all levels and providing a working environment that is inclusive, where people feel safe, respected and experience a sense of belonging. In practice this means that we seek out people with a variety of thinking styles, backgrounds and abilities.

We recruit based on merit, potential and attitude. We aim to create and support a diverse workforce that represents and reflects the communities that we operate in and our customer base. Where possible we will promote internal talent.

We believe in paying people fairly and competitively. We review rates of pay annually and increases are made based on performance, market relativity, independent job evaluations and business performance.

Along with fair pay we believe in rewarding and recognising our people for tenure, extra efforts

and celebrating good business performance. We run an annual Excellence Awards program, we provide long service gifts and leave.

As an NZPM employee you can access generous discounts on products we sell.

We recognise the need to take specific actions to remove barriers for those with disabilities. This includes for customers, visitors or employees. If you have a specific need please speak to your manager to see if we can help.

We understand that flexibility and work/life integration are important and where possible we aim to support this with flexible working arrangements.

We support the well-being of our people by providing health insurance, flu injections, a workplace wellness programme and taking part in fundraising days for charities and other community organisations.

We also provide paid time off for employees who want to volunteer for a registered and approved charity, please speak to your manager for further information on this.

We are opposed to all forms of unethical business behaviour. We recognise the harmful impact that modern slavery has on individuals and society; we are committed to help prevent these practices and we have minimum standards that we expect of suppliers regarding complying with international and domestic labour laws.



INVESTING IN OUR PEOPLE.
WE BELIEVE IN SUSTAINABLE
EMPLOYMENT, GROWING
OUR TEAM, MANAGING
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WE BELIEVE THAT GOOD
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