



# Channel

Infrastructure NZ



# Code of Conduct

This Code of Conduct is reviewed at least on a biennial basis by the People and Culture Committee, or earlier if determined by the Committee, the Board or by management.

Any change to this Code requires the approval of the Board.

Policy Owner: Chief Executive

Issue date: 30 June 2026

## Message from Rob Buchanan, CEO He karere nā te Pouwhakahaere



### Message from CEO / He karere nā te Pouwhakahaere

Welcome to Channel Infrastructure. We are a world class owner and operator of critical fuel and energy infrastructure and pipelines essential to keeping people moving. People are at the heart of what we do – whether it's keeping people moving and supplied with fuel or supporting our own people to come to work every day in an environment that is supportive, safe, and that provides ample opportunities for growth and career development.

At work each day, it's our team who will make the difference, and in return for your effort and dedication, we offer the opportunity to work with some of the best and brightest minds, solving some of New Zealand's biggest challenges and investigating a number of exciting opportunities that will help drive our business forward into the future.

As a business, we will support you to reach your full potential with us. In return, we ask that at work you adhere to our company values, support our mission, and act as an ambassador for our work in all that you do. This document aims to guide your decision-making process and to help you achieve your potential, both for yourselves and for Channel Infrastructure, all while doing the right thing by your colleagues, our community, customers, and New Zealand.

If you have any questions or concerns about the information contained in this document, please don't hesitate to contact Chris Bougen (General Counsel) or your line Manager. You can also directly contact me at any time.

## Why do we need a code of conduct? / He aha i matainaina ai he kaupapa here ā-whanonga?

Setting a standard of how we conduct ourselves and work together to hold ourselves and each other to account is ingrained in our company culture. This is an important part of all the interactions we have with our colleagues, our shareholders, our customers, our neighbours, our community and local Iwi, and the wider society.

We expect our people to take personal responsibility for their behaviour, and at all times to be respectful and act with integrity and ethically in accordance with the law. This Code of Conduct won't cover every situation, but we expect that as individuals you will take responsibility and act with good judgement.

This Code of Conduct applies to all our people at Channel Infrastructure and its subsidiaries, including secondees, contractors or consultants, and directors. We conduct training for all our people on the Code of Conduct at least every two years (or in the year the Code of Conduct is materially amended).

## Our Polices

At Channel Infrastructure we also have policies and guidelines that, along with our Code of Conduct, inform how we expect everyone to behave. These polices are enforceable and part of how we guide and protect everyone. At Channel Infrastructure we must all read and understand the company polices. These are freely available on the company intranet.

## We all have responsibilities when we work at Channel Infrastructure, some important ones to note are below

Your individual responsibilities are to:

- Make sure you act safely at work, take steps to keep your colleagues safe, and stop work and speak up if you believe any work you are doing or see is unsafe;
- Comply with all applicable laws, rules and regulations, and generally uphold high ethical practices;
- Comply with all reasonable requests and directions from Channel Infrastructure management;
- Comply with all Channel Infrastructure policies and procedures that may be amended from time to time; and
- Report conduct you think might breach the Code.

Our responsibilities as your employer are to:

- Provide you with a safe place to work;
- Explain to you what the Code of Conduct and other Channel Infrastructure policies and procedures mean for you;
- Deal with you openly and fairly;
- Comply with all applicable laws, rules and regulations; and
- Comply with all Channel Infrastructure policies and procedures, which may be amended from time to time, and act on Code of Conduct and policy breaches that are brought to our attention.

## Speaking up / Whākina atu

Speaking up is something we encourage everyone at Channel Infrastructure to do. This includes reporting conduct you think might breach the Code.

### How do I ask for help / Speak up?

We recognise speaking up can be difficult. There are a number of people you can choose to talk to. You should choose someone who you feel comfortable talking to if you think something is not right, or you think this Code has been breached. You can speak with:

- A colleague
- Your Line Manager
- The General Manager
- General Counsel and Company Secretary

- Chief Financial Officer
- Chief Executive

If you would prefer to make a protected disclosure because you think the information you have is about Serious Wrongdoing, you should report to the Chair of Audit and Finance Committee at [Protected.Disclosure@channelnz.com](mailto:Protected.Disclosure@channelnz.com). We prefer these reports to be in writing, and that protects you as well. If you would like to understand more about this process, please read the Whistleblowing Policy on the intranet.

## **What happens when I make a complaint?**

All complaints will be confidential, as far as the law allows. If you decide to use the Whistleblowing Policy, your identity will also remain confidential (other than those people who you disclose the information to).

All complaints will be taken seriously and you will be protected, supported and kept informed throughout any process, even if no action is taken as a consequence.

## **Escalation process**

The normal process when making a disclosure is to inform the Chair of the Audit and Finance Committee but this can be escalated to the Chair of the Board, each of whom will take the necessary steps to investigate the allegations immediately after the disclosure is received.

People who make a disclosure of wrongdoing in accordance with the Protected Disclosures Act 2000 and the Company's Whistleblowing Policy are protected against retaliatory action or adverse treatment as a result of making that disclosure.

# **How we work together at Channel Infrastructure / Koia te hātepe e mahi tahi ai mātou i tūāhanga Channel**

We are committed to working together in a positive and productive way that creates an environment where everyone thrives. This means we expect all Channel Infrastructure people to treat others fairly, act honestly, and protect our people and property.

## **Keeping everyone safe and well on our site**

At Channel Infrastructure we are committed to the safety and wellbeing of our people and our community. It is something we take very seriously. Our focus is keeping everyone safe every day.

- We have a thorough and systematic approach to health, safety, security and environmental management. Safety and wellbeing are integrated into everything we do and are critical to our business success, and our guiding mission to keep everyone safe every day. This means reporting an accident, incident or near miss when it happens, speaking up if you see something that doesn't look right, and taking care of one another.
- Importantly, everyone at Channel Infrastructure must familiarise themselves with and comply with the Channel Infrastructure Group's Health, Safety, Environment and Quality Policy and relevant Management System requirements.

## **Treating our people right**

Everyone deserves to come to work and be treated with respect. At Channel Infrastructure we strive to act inclusively every day and treat each other with dignity and respect. We encourage diversity and want everyone to feel valued members of the Channel Infrastructure team.

There is no place in our team for sexual harassment, offensive behaviour, retaliation, intimidation, harassment or bullying, or discrimination of any kind. Please refer to our policies if you are concerned about behaviour that you have either experienced or observed that has not been respectful or could breach one of our policies.

## **Investors**

At Channel Infrastructure, investors are important to us and our business. We want to build a positive relationship with our investors, so they feel informed about our activities, and confident in our plans for the future. A good working relationship that supports integrity and mutual trust is critical to ensuring we maintain the confidence of our investors.

## **Customers**

We treat our customers and suppliers with respect; without them and their business, we would not have a business. We strive to do our best work to ensure an outstanding customer service that is friendly and inclusive. We want to be people who they want to work with.

## **Our neighbours, community and environment**

At Channel Infrastructure we have an ongoing commitment to our local community and whanau, and we are committed to being a good neighbour, employer, and corporate citizen. We acknowledge and respect tangata whenua and their connection to the rohe in which we operate. Looking after whanau and communities is in our DNA. Without our communities we would not be able to come to work and do what we do every day at Channel Infrastructure. We are also committed to minimising our impact on the environment around us.

## **Our Contractors and Suppliers are an integral part of our business**

At Channel Infrastructure contractors and suppliers are critical to the way we do business. We always strive to build mutually beneficial relationships with our key stakeholders. We will treat our contractors and suppliers fairly with respect and expect the same from them.

## **Important Policies that we must all adhere to / Ko ngā tino Kaupapa here e paihere nei i a tātou**

As an employee of the Channel Infrastructure Group, you should make sure you don't take advantage of opportunities arising from your employment or connection with the company for personal gain or to compete with a member of the Channel Infrastructure Group.

## **Information disclosure and securities trading**

At Channel Infrastructure everyone must:

- safeguard the confidentiality of corporate information to avoid disclosure;

- alert the General Counsel and Company Secretary (or alternatively, the CEO or CFO) if you become aware of any non-public price-sensitive information. For further information, please refer to the Continuous Disclosure Policy; and
- not speak to the media, investors or make public statements or represent the company in any way on behalf of the Channel Infrastructure, unless you are an authorised spokesperson. Media is considered to be all forms of media, including news services and journalists, social media and internet blog sites.

If you are aware of non-public price-sensitive information from, or about, the Channel Infrastructure Group, you are by law prohibited, whether directly or through family members or any other persons or entities, from:

- buying or selling securities of the Company;
- passing on, tipping or disclosing that information to others, including family and friends.

Prior to trading in the Company's securities, you should check the Company's Securities Trading Policy for any restrictions or requirements that apply to you.

## Managing conflicts of interest

- We expect everyone at Channel Infrastructure to be committed to the success of the company. We expect and rely on you to act honestly inside and outside the company.
- We depend on everyone at Channel Infrastructure to speak up if there is an actual or perceived conflict of interest between your personal interests, and the interests of the business as a whole and/or any of its subsidiaries.
- A conflict could arise when a member of your family has an association with another business that is seeking to become a contractor or business partner of Channel Infrastructure. If you are unsure if this is a conflict you should speak with your manager.
- You should discuss with, and gain approval from your manager before taking up any job, role or directorship outside Channel Infrastructure where you think there might be a risk of an actual or perceived conflict of interest.

## Receiving Gifts and potential Bribery and Corruption

- Bribery and corruption are not acceptable in our business. Facilitation payments, kickbacks, and unlawful collusion are examples of corrupt activity and are illegal – and must not be accepted. The Whistleblowing Policy can be used to protect you if you want to make a “Protected Disclosure” in accordance with that Policy.
- Think carefully when giving or receiving gifts or entertainment. You should not accept a gift, in circumstances which you think are being used to influence a decision, in return for favourable treatment. Gifts can include travel, events, accommodation, goods, services, discounts, or special terms.
- If any gift or benefit received, given or offered is more than \$100 in value, please let your manager and the General Counsel know in writing so it can be recorded in a gift register maintained by the company.

- Company funds or resources cannot be used to support any political parties, candidates, or any political cause or election fund.
- Any form of joint collaboration with suppliers, customers or competitors must be discussed and approved by the Channel legal team before any discussions are held, or agreements reached.
- For more information on this please refer to the Anti-Bribery and Corruption Policy.

## Confidentiality

You must always maintain and protect the confidentiality of information or knowledge about Channel Infrastructure financial affairs, and all other confidential information about the business and its affairs. The only exception to this is when the disclosure is authorised by the company or required by law.

## Protecting our company assets, information and equipment

We expect all Channel Infrastructure staff to treat company assets and equipment with respect, be sustainable and minimise waste.



## Thank you from our General Counsel, Chris Bougen

Thank you for taking the time to read and familiarise yourself with this Code of Conduct and our policies. We believe that Channel Infrastructure is a great place to work, and by adhering to the Code and our policies, we can ensure that all colleagues have a clear understanding of our expectations around the way that each of us needs to conduct ourselves in our daily interactions.

If you have any questions or concerns about anything contained in this document, please speak to your Line Manager or your General Manager – or feel free to contact me directly on [chris.bougen@channelnz.com](mailto:chris.bougen@channelnz.com).