



Supplier Code of Conduct

Policy Owner: Chief Executive Officer

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1. Introduction

The way Channel Infrastructure NZ Limited and its subsidiaries (together **Channel**) do business is shaped by our values of **Care, Honesty, Innovation** and **One Team**. These values underpin how we work, the decisions we make, and the standards to which we hold those who work with us.

Suppliers play an essential role in helping Channel operate safely, reliably and responsibly. By working together and upholding these shared values, we can build trusted, long-term relationships and continue to deliver positive outcomes for our customers, shareholders, communities and wider stakeholders.

2. Scope

This Code sets out the minimum standards of behaviour, business conduct and responsible business practices that Channel expects from its suppliers, including a supplier's parent companies, subsidiaries, affiliates and subcontractors (**Suppliers**). It applies to all Suppliers who carry out work for Channel, regardless of the goods or services they provide or where they operate, and aligns with Channel's [Code of Conduct](#).

This Code complements but does not replace the obligations in any contract between a Supplier and Channel. A Supplier's specific obligations will depend on the nature of the goods or services provided and the terms of their contract. However, all Suppliers are expected to act in a manner that reflects Channel's values and the principles set out in this Code, and to maintain appropriate systems, processes and controls to support compliance with this Code, promote good conduct, reliable performance and a positive working culture.

Suppliers are responsible for ensuring that all people they engage to carry out work for Channel understand and act consistently with the principles in this Code when carrying out work for Channel.

3. Supplier Responsibilities

3.1. Health and safety

At Channel, our values of **One Team** and **Care** are reflected first and foremost in our commitment to safety. Consistent with the principles set out in Channel's [Health, Safety, Environment and Quality Policy](#), we are committed to ensuring that no one is harmed through the work we do and to fostering a culture where health and safety are integral to every decision. The following principles underpin our approach to health and safety:

- all injuries can be prevented
- everyone's participation is essential
- management is accountable for safety performance
- all operating exposures can be safeguarded
- training and equipping people to work safely is essential
- working safely is a condition of performing work for Channel
- meaningful safety-focused conversations and feedback are a must.
- leaders promote off-the-job wellbeing and safety

- safety learnings must be shared

We expect Suppliers to uphold these principles, demonstrate leadership and accountability for health and safety, raise any concerns, and help prevent harm. Our shared goal is simple: **everyone safely home every day**.

Suppliers must:

- comply with all health and safety laws applicable to their activities;
- identify, assess and eliminate or minimise health and safety risks so far as is reasonably practicable, and foster a positive health and safety culture that encourages active participation by all workers, open communication, learning and personal accountability;
- create an environment where workers are empowered to stop unsafe work, challenge unsafe behaviours, raise concerns without fear of reprisal and have meaningful safety-focused conversations; and
- ensure that workers performing work are appropriately trained and equipped to perform work safely;
- support continuous improvement through the reporting, investigation and sharing of learnings from incidents, hazards and near misses.

3.2. Ethical business conduct

At Channel, our value of **Honesty** means acting ethically, transparently and with integrity. Channel values long-term relationships built on trust, accountability and mutual respect. Consistent with the principles set out in Channel's [Anti-bribery and Corruption Policy](#), Channel has zero tolerance for bribery, corruption or other unethical business practices. We expect Suppliers to demonstrate the Honesty value in their dealings with Channel, as well as their dealings with others.

Suppliers must:

- comply with all financial, economic and trade sanctions laws applicable to their activities;
- conduct business ethically, fairly and transparently at all times;
- not engage in bribery, corruption, facilitation payments, unlawful collusion or any other conduct that could improperly influence business decisions or create an unfair advantage; and
- promptly disclose to Channel any actual, potential or perceived conflict of interest that may affect, or appear to affect, their ability to act objectively, independently and in Channel's best interests.

3.3. People, human rights and wellbeing

At Channel, our values of **Care** and **One Team** are reflected in the way we treat people. Channel embraces the concept of Manaaki – caring for, supporting and showing kindness to others, and acting with respect, generosity and a commitment to the wellbeing of all people. Our [Diversity and Inclusion Policy](#) and [Modern Slavery Policy](#) reinforce our commitment to foster a workplace and supply chain where all people are treated with dignity, respect and fairness, and where diversity, inclusion and human rights are valued and protected. We expect our Suppliers to share our commitments.

Suppliers must:

- comply with all employment and modern slavery laws applicable to their activities;
- respect the human rights of their workers and others affected by their activities;
- provide safe and healthy working conditions for workers and others affected by their activities;
- promote diversity and inclusion by fostering a workplace free from discrimination, harassment, bullying and exploitation, where people are treated fairly and diverse perspectives and experiences are valued;
- not engage in, tolerate or benefit from any form of modern slavery, including forced labour, child labour, debt bondage or human trafficking;
- be aware of modern slavery risks within their activities and supply chains and take appropriate steps to prevent, mitigate and address identified concerns;
- provide reasonable information to, and cooperate with, Channel to support the assessment, management and reporting of modern slavery risks within Channel's supply chain; and
- promptly notify Channel of any actual or suspected modern slavery incidents, breaches or material risks identified within their activities or supply chains.

3.4. Environmental responsibility

At Channel, our values of **Innovation** and **Care** guide our approach to environmental responsibility, as reflected in Channel's [Health, Safety, Environment and Quality Policy](#). We are committed to protecting the environment, minimising the impact of our operations, and continually improving our environmental performance. Through robust environmental controls, a strong "no spill" culture, and responsible stewardship of the land, coastline and communities where we operate, we seek to ensure our activities are conducted responsibly and sustainably. We expect Suppliers to share our commitment to the environment, and support environmentally responsible and sustainable business practices.

Suppliers must:

- conduct their business in accordance with all applicable laws and regulations regarding the protection of the environment;
- identify, assess and manage environmental risks arising from their activities;
- take reasonable steps to prevent pollution, spills, uncontrolled discharges and other adverse environmental impacts; and
- use natural resources responsibly and seek opportunities to reduce waste, emissions and environmental impacts.

3.5. Data protection, cybersecurity and confidentiality

At Channel, our values of **Honesty** and **One Team** extend to responsible management of information. We recognise that our people, customers, business partners and stakeholders place trust in us to protect confidential information and personal information and to manage it responsibly. We expect our Suppliers to share this commitment and to maintain appropriate standards of privacy, cybersecurity and information security throughout their business.

Suppliers must:

- comply with all relevant laws and regulations, and have systems in place to demonstrate they can protect personal information in accordance with all applicable privacy and data protection laws;
- protect Channel's confidential information, intellectual property, and personal information from unauthorised access, use, disclosure, alteration, or loss;
- implement and maintain appropriate administrative, physical and technical safeguards, proportionate to the nature and sensitivity of the information they hold on Channel's behalf; and
- promptly notify Channel of any actual or suspected cybersecurity incident, data breach or unauthorised access that may affect Channel's information, systems or assets.

4. Reporting concerns

Channel encourages Suppliers to report any activity by a business that conflicts with the principles in this Code. Suppliers are expected to raise concerns early and cooperate with Channel to address any concern. Channel's [Whistleblowing Policy](#) provides a framework for raising and investigating concerns and supports the confidential reporting of wrongdoing. Reports may be made to the Chair of the Audit and Finance Committee at Protected.Disclosure@channelnz.com.

Channel takes compliance with this Code seriously. Where a Supplier breaches this Code, or does not take appropriate steps to address a breach or concern, Channel may require the Supplier to take appropriate action, review the Supplier's ongoing engagement with Channel, or terminate its contract or business relationship with the Supplier, in accordance with Channel's contractual rights and applicable law.