



## Supplier Code of Conduct

For more than 150 years, Tower has been helping Kiwis and Pacific customers protect their homes, cars, and businesses. We're undertaking a transformation that leads to higher growth through a relentless focus on our customers, and we're proud that our suppliers can be a part of this journey.

At Tower, we are relentlessly focused on delivering a beautifully simple and rewarding experience for our customers. Our purpose is to inspire, shape and protect the future for the good of our team, customers, and communities, and to get there, we have set out a number of clear strategic priorities aimed at helping us to grow and innovate, as well as to build financial strength and capability as a company.

We are committed to sustainable, responsible, and ethical behaviour that delivers positive outcomes for us, our suppliers, and our customers. It is crucial that we engage with suppliers who share this commitment, to reinforce alignment and ensure consistency amongst all third parties.

This Supplier Code of Conduct (**Code**) outlines our expectations for our suppliers, as well as their suppliers and subcontractors. Suppliers of Tower are expected to engage with their supply chain at a minimum to the standards outlined in this Code. Tower also expects our suppliers to comply with any terms and conditions agreed to between the parties and act in good faith towards each other.

## Compliance with Laws and this Code

Suppliers must comply with all applicable local, national, and international laws, regulations and codes relating to their business. In addition to this Code, we expect our suppliers to implement appropriate policies, procedures, and training to ensure compliance with such laws, regulations, and codes.

Suppliers are also expected to maintain and, periodically upon request from Tower, be able to provide Tower with documentation which demonstrates compliance with this Code. In addition, we encourage suppliers to discuss with us on a regular basis their progress towards their adoption or improvement with the principles set out in this Code.

For clarity, these expectations will be set out in any agreement the Supplier has with Tower.

## Ethical Behaviour

At Tower, we have a Code of Ethics Policy to protect and uphold our values, and in doing so, we're proud to have fostered a culture designed to uphold these standards with our team, our customers and those we partner with.

Tower expects our suppliers to:

- conduct their business activities with integrity and to a high ethical standard, regardless of the country where they are doing business
- not engage in any form of corruption including extortion, bribery, money laundering, insider trading or other illegal/unethical practices, and to disclose any potential conflict of interest to Tower



- respect third party intellectual property rights, and not improperly use confidential or personal information obtained in the course of doing business with Tower
- be transparent about their ethical policies and practices.
- declare all current or potential conflicts of interest.

## Health and Safety

The health and safety of our people and those we partner with is paramount. At Tower, we all contribute towards a safe working environment, a positive safety culture and continuous improvement of the health, safety and wellbeing of our workers. It's important that our people (including our suppliers, and their suppliers and contractors), know their health and safety is at the forefront of everything we do.

Tower expects our suppliers to:

- develop and maintain sound health and safety management policies, practices and management systems that are designed to promote the health of employees, reduce work related injuries and illness, and ensure the safety and quality of products and services
- ensure sufficient training and protection for employees to provide a safe and secure workplace
- ensure that all their employees, agents and sub-contractors comply with applicable health and safety laws, regulations, and customer requirements.

## Social Responsibility

We are a born and bred Kiwi insurer with teams across the Pacific and Aotearoa. Being there for people every step of the way is fundamental to everything we do, and our geographical footprint means we have a unique role to play in the communities we operate in.

The Tower team come from all walks of life and care for one another, and this extends to our partners and our customers. In staying true to our purpose, we have implemented governance practices that are compliant with New Zealand and Pacific regulations.

In addition, diversity and inclusion are the cornerstones of our innovative and resilient business, and we are committed to ensuring equal opportunities for all with zero tolerance for discrimination. We want to align ourselves with partners who share these commitments.

## Labour and Human Rights

Tower expects our suppliers to:

- adhere to international human rights standards as set out in the [United Nations Universal Declaration of Human Rights](#) in their workplace, and monitor and address these standards within their supply chain
- comply with relevant government employment standards and maintain a workplace that is free from unlawful discrimination
- respect human rights and ensure no employee shall suffer harassment, physical, mental, or other forms of abuse
- identify and address any potential risks of modern slavery in their global and domestic operations and supply chains, such as servitude labour and ensuring employees are employed of their own free will



- not use child labour and to comply with International Labour Organisation (ILO) standards
- ensure employees are treated equally regarding recruitment, working conditions, advancement, job training and salary, regardless of gender, sexual orientation, age, ethnicity, religion, disability, or other distinguishing characteristics
- respect employees' right to freedom of association, and collective bargaining and negotiation on key conditions of employment.

## Diversity, Inclusion, Conduct and Culture

Tower expects our suppliers to:

- refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory, and prohibited activity in public forums, including on social media platforms when representing our suppliers via a business media presence
- refrain from displaying or sharing excessive political bias when operating under our supplier's business media presence
- not act or speak on behalf of Tower, represent themselves as Tower, or express any views attributable to Tower unless expressly authorised to do so by Tower
- not use Tower's brands or logos, except as expressly permitted by Tower in writing
- support diversity, equity, and inclusion by working with groups such as LGBTTQIA+, Māori, Pasifika, people with disabilities and accessibility needs, to help create an equal opportunity working environment
- foster gender balance and be committed to finding and removing any gender pay gaps that may exist in their business
- actively support the communities and improve the environment in which they operate
- consider working with locally based, Māori and Pasifika operated, and women-led businesses.

## Environmental Sustainability

At Tower, we're on a sustainability journey and have developed an Environment, Social and Governance (ESG) strategy that details and guides how we manage our ESG issues today and into the future.

As a Kiwi and Pacific insurer, we play a crucial role in protecting Aotearoa and the Pacific and contributing to their prosperity for future generations. From an environment sustainability perspective, we strive to be authentic and walk the talk on sustainability, and this is vital to ensure integrity and credibility. We're always checking in to make sure the right foundations are in place and that we're always thinking ahead and want to partner with companies who share these values.

Tower expects our suppliers to:

- establish environmentally responsible business practices and seek to proactively improve their environmental performance, particularly in reducing their carbon footprint and waste
- conduct their business activities to a high environmental standard regardless of the country where they are doing business
- conduct their business in accordance with applicable laws, regulations, and standards regarding the mitigation of impacts on, and protection of, the environment



- adopt responsible practices that deliver benefits to their own operations and supply chains, and improve their and our sustainable performance over time
- measure, track, and reduce emissions from business activities, such as transport, electricity, heating, and waste, in line with Government and industry guidelines
- consider using upcycled, recycled and/or reused materials where possible
- consider the end-of-life for products if providing physical products and services.