

Tower is a born and bred Kiwi insurer with more than 150 years of history and teams across Aotearoa New Zealand and the Pacific. We expect suppliers to operate lawfully and ethically, and in a way that supports fair customer outcomes, sound risk management, and responsible business practice. This Supplier Code of Conduct (Code) and Tower's Fair Conduct Programme sets out the minimum standards we expect from suppliers, contractors, consultants, service providers, and any subcontractors or other parties who deliver goods or services to Tower and its customers (directly or indirectly).

These standards reflect Tower's role in supporting our customers and communities across our region. They are intended to align with responsible procurement practice, including principles commonly reflected in Chartered Institute of Procurement and Supply guidance, financial services third-party risk frameworks, and modern conduct expectations for insurers and other regulated organisations.

Suppliers are expected to apply these standards within their own operations and, where relevant, across their supply chains. If a supplier uses subcontractors, third or fourth parties in connection with Tower, the supplier remains responsible for appropriate oversight, due diligence, and risk management.

This Code does not replace contractual obligations or applicable law. If Tower's contract, policy requirements, or legal obligations set a higher standard, suppliers are expected to meet that higher standard. Tower may ask for information, evidence, attestations, or improvement plans to assess compliance with this Code.

1. Compliance and Governance

Suppliers must comply with all applicable laws, regulations, regulatory standards, and industry codes in the jurisdictions where they operate and where the services are provided to Tower and its customers. This includes maintaining appropriate governance, policies, controls, and training to support compliance.

Suppliers must keep accurate books, records, and supporting documents, and be able to demonstrate compliance with this Code if asked. Suppliers should promptly notify Tower of any potential or actual material breach of law, regulatory issue, investigation, enforcement action, or other event that may affect their ability to meet Tower's requirements.

Suppliers must maintain effective oversight of subcontractors, outsourced arrangements, and parties used to support Tower services, including appropriate due diligence, contractual controls, and ongoing monitoring.

2. Ethics, Integrity and Fair Dealing

Suppliers must act with honesty, integrity, and transparency in all dealings with Tower, Tower customers, regulators, and other stakeholders. Suppliers must avoid conduct that could create legal, regulatory, operational, or reputational risk for Tower.

Tower expects suppliers to:

- conduct their business activities with integrity, promoting fair conduct and to a high ethical standard, regardless of the country where they are doing business

- comply with anti-bribery, anti-corruption, fraud, anti-money laundering, sanctions, competition, and conflicts management requirements
- not offer, request, give, or receive any improper payment, gift, benefit, favour, or other inducement intended to influence a decision
- identify, disclose, and actively manage any actual, potential, or perceived conflict of interest
- protect confidential information, intellectual property, and commercially sensitive information obtained through the relationship with Tower
- maintain ethical decision-making processes and cooperate with reasonable due diligence and assurance activity requested by Tower

3. Fair Customer Outcomes and Conduct

Where suppliers interact with Tower customers, customer information, customer-facing processes, claims, distribution, service delivery, or other activities that may affect customer outcomes, suppliers must support Tower's obligation to treat customers fairly and deliver services with due skill, care, and diligence.

Tower requires suppliers to:

- act consistently with fair conduct principles and not engage in misleading, unfair, deceptive, oppressive, or high-pressure conduct
- communicate clearly, accurately, and in plain language appropriate to the audience
- take appropriate account of customer needs and vulnerabilities where relevant to the service being delivered
- have due regard to Tower customers' interests, assist Tower customers to make informed decisions and not subject them to unfair pressure or undue influence.
- not be disrespectful, unprofessional, harassing, defamatory, discriminatory, or otherwise inappropriate conduct in public forums or on social media where this could affect Tower, Tower customers, or services provided on Tower's behalf
- not act or speak on behalf of Tower, or represent any view as attributable to Tower, unless expressly authorised in writing to do so by Tower
- not use Tower's name, brands, or logos except as expressly permitted by Tower in writing
- avoid displaying excessive political bias when operating a business media presence connected to services provided to Tower
- escalate conduct issues, complaints, incidents, or systemic concerns that may affect customer outcomes to Tower without delay

4. Risk Management, Operational Resilience, Privacy and Security

Suppliers must maintain appropriate risk management and internal control environments for the goods and services they provide to Tower. This includes operational resilience, cyber security, information security, data privacy, business continuity, incident management, and oversight of material subcontractors and technology providers.

Where suppliers process, access, host, transmit, or store Tower information or personal information, they must implement proportionate safeguards to protect confidentiality,

integrity, availability, and lawful use. Suppliers must notify Tower promptly of actual or suspected security incidents, privacy breaches, service disruptions, or other control failures that may affect Tower, its customers, or its operations.

Suppliers will regularly test business continuity and recovery arrangements to ensure they are appropriate to the criticality of the service, maintain appropriate access controls and personnel screening, and support Tower's due diligence, audit, assurance, and remediation requirements where contractually agreed or reasonably requested.

Labour, Human Rights and Inclusive Workplaces

Tower expects suppliers to:

- comply with internationally recognised human rights and comply with applicable labour and employment laws
- prohibit forced labour, bonded labour, human trafficking, child labour, and all forms of modern slavery in their operations and supply chains and take reasonable steps to identify, assess, and address if required, regularly.
- provide lawful wages, working hours, leave, and employment conditions, and treat workers with dignity and respect
- maintain workplaces free from unlawful discrimination, harassment, bullying, victimisation, and retaliation
- support freedom of association and collective bargaining where permitted by law
- support inclusive workplaces and equal opportunity, including fair treatment regardless of gender, sexual orientation, age, ethnicity, religion, disability, or other distinguishing characteristic protected by law
- foster gender balance and take reasonable steps to identify and address gender pay gaps within their business where relevant and proportionate

Health, Safety and Wellbeing

Tower expects suppliers to:

- provide and maintain a safe and healthy work environment, including suitable systems to identify, assess, and control hazards and risks
- ensure workers are appropriately trained, supervised, and equipped for the work they perform
- comply with applicable health and safety laws and report notifiable events, serious incidents, or safety concerns relevant to goods or services being supplied to Tower without delay
- promote worker wellbeing and a positive safety culture, including where work is undertaken on Tower sites or Tower customer's premises.

5. Environmental and Social Responsibility

Suppliers are expected to manage environmental and social impacts responsibly and to support continuous improvement over time. Tower recognises that maturity will vary, but expects suppliers to understand the impact of their activities and take proportionate action to manage them.

This includes reducing waste, emissions, pollution, and unnecessary resource use where practical; complying with environmental laws and permits; measuring, tracking, and reducing emissions from business activities where relevant and proportionate; and considering resilience, climate-related impacts, and end-of-life outcomes in relevant products and services. Suppliers are encouraged to support diverse, inclusive, and sustainable supply chains, contribute positively to the communities in which they operate, and consider opportunities to work with locally based, Māori, Pasifika, and women-led businesses where relevant.

Tower expects suppliers to:

- work with Tower in good faith to address identified issues, gaps, or improvement actions
- maintain effective processes and methods for workers and others to raise concerns without fear of retaliation
- understand that material or repeated non-compliance may lead to corrective action, escalation, or termination of the supplier relationship, subject to contract and applicable law

6. Speak Up, Monitoring and Remediation

Suppliers must support a culture where concerns can be raised early and addressed proactively and properly. Tower will monitor compliance with this Code through onboarding, periodic review, assurance activity, attestations, questionnaires, document requests, or other mechanisms proportionate to the services.

Where issues are identified, suppliers are expected to cooperate with Tower, investigate appropriately, and implement timely corrective action. Tower reserves the right to respond to non-compliance in line with contractual rights, risk severity, and applicable law.