

Supplier Code of Conduct

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*This is an approved controlled document and is subject to change.
Please ensure you always have the most up-to-date copy.*

1.0 PURPOSE & SCOPE

ETEL's vision is "BETTER ways to connect people to power". Central to the vision is strong relationships with our trusted suppliers. We are committed to sustainable, ethical and socially responsible procurement. We hold ourselves accountable to the highest industry standards, acting in accordance with our Procurement and Purchasing Policy, Code of Conduct, supporting standards and frameworks.

We expect the same high standards from all parties with which we have dealings, including suppliers. This is achieved through three areas: business ethics, good labour standards and a strong community focus. We're committed to working with you to identify in these three areas what is best practice, improvement opportunities and to drive mutually beneficial value.

We view our suppliers as valued partners and this Supplier Code of Conduct ('the Code') sets out our minimum expectations of your company and your supply chain in providing goods and services to our organisation and our customers.

ETEL expects you, and your employees, agents, suppliers and sub-contractors, to respect and comply with this Code when conducting business with or on behalf of ETEL. It is your responsibility to communicate this Code to your employees, agents, suppliers and sub-contractors and to take reasonable steps to ensure they comply.

By accepting this Code, you acknowledge and confirm that you will adhere to and comply with the principles set out in this Code for all existing and future business relationships with ETEL. This Code is to be read in conjunction with any agreement with ETEL.

ETEL includes ETEL Limited (NZBN 9429032454673) and its subsidiaries including, ETEL Transformers Pty Limited (ABN 34 140 029 456) and PT Lucky Light Globalindo.

2.0 DOCUMENT OWNER

ETEL Procurement

3.0 REVIEW DATE

Annually, at the start of the calendar year

4.0 POLICY

ETEL includes ETEL Limited (NZBN 9429032454673) and its subsidiaries including, ETEL Transformers Pty Limited (ABN 34 140 029 456) and PT Lucky Light Global- Indonesia

1. BUSINESS ETHICS

Honesty, integrity and fairness

You shall recognise the importance of honesty, integrity and fairness in conducting your business and follow transparent business processes with high standards of business conduct.

Compliance with laws and regulations

You must comply with the letter and spirit of all laws and regulations that affect business conducted with ETEL, including applicable employment, immigration,

human rights, privacy, anti-bribery and corruption, workplace health and safety, environmental, trade sanctions and modern slavery-related requirements.

All economic and trade sanctions in the jurisdictions in which you operate which are applicable to your business activities.

Fraud (including bribery and corruption)

You shall acknowledge that fraud, bribery and corrupt behaviour is unlawful. You must not offer, give, request or accept payments, payments in kind, bribes, 'kickbacks', secret commissions, gifts or favours of any kind that could be considered as influencing the party involved, creating any obligation or conflict of interest. There are certain types of gifts that should never be offered or accepted by you irrespective of value—these are: cash or cash equivalents, drugs or other controlled or illegal substances.

Gifts

You must not offer any non-cash gifts / entertainment in excess of normal business practices, cash payments or kickbacks to any ETEL employee which is likely to influence them to take an improper course in the future procurement of goods or services.

Privacy and information

You must respect the privacy of individuals and laws relating thereto, in particular, with respect to the collection, processing and management of personal data. The unauthorised use of confidential and/or personal information by you is prohibited.

Services and products

All services and products delivered by you must meet the quality and safety standards required by applicable law, be fit for the intended purpose and, where applicable comply with ETEL quality requirements.

Confidential information and Intellectual Property

You must ensure that ETEL's confidential information is preserved and protected and not disclosed to unauthorised parties. Information that is not normally available outside ETEL may only be used for authorised purposes. If you are uncertain about whether information may be disclosed, guidance should be obtained from the relevant ETEL manager. You must not use another party's intellectual property without prior written approval.

Risk Management and Communication

You must identify, understand and manage risks relevant to the goods or services you provide to ETEL, including legal, ethical, labour, human rights, health and safety, environmental, security of supply and reputational risks. You must promptly notify ETEL of any significant incident, suspected breach of this Code, material risk to delivery, or behaviour that may affect ETEL's reputation.

You must not act, or be perceived to act, in any way which is likely to damage ETEL's reputation in the marketplace.

You must, to the extent permitted by law, have appropriate systems in place through which allegations of wrongdoing may be reported, investigated and dealt with.

2. LABOUR STANDARDS

Working environment

You shall provide a safe, secure and healthy work environment for your employees, contractors and visitors and ensure that this is supported by adequate safety programs in accordance with applicable laws and regulations.

Non-discrimination

You shall not discriminate in hiring and employment practices on the grounds of criteria such as race, creed, disability, gender, marital status, religious or political beliefs, age or sexual orientation.

Compensation

Your employees must receive compensation and benefits that comply with applicable laws and, where relevant, with binding collective agreements, including those pertaining to overtime work.

Working hours

You must ensure that your employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.

Freedom from harassment

You shall ensure a work culture that affords your employees the opportunity to work without fear of violence, intimidation or reprisal and ensure employees are protected against bodily punishment and any physical, sexual, psychological or verbal harassment or abuse.

Anti-slavery

You must not engage in, support or benefit from any form of modern slavery or worker exploitation, including human trafficking, slavery, servitude, forced labour, debt bondage, deceptive recruitment, forced marriage, child labour or the worst forms of child labour. You must take reasonable steps to identify, prevent, mitigate and address modern slavery risks in your own operations and supply chain, and must notify ETEL promptly if you become aware of an actual or suspected modern slavery issue connected to goods or services supplied to ETEL.

You must support and respect internationally recognised human rights, comply with laws regarding child labour, and only employ workers who meet the applicable minimum legal age for employment. Workers must be employed freely, with clear terms of employment, no unlawful withholding of wages or identity documents, and no recruitment fees that create debt bondage or coercion.

3. COMMUNITY FOCUS

Environmental Compliance

You must manage your operations in an environmentally responsible manner and ensure compliance with related laws and regulations.

You must implement controls and initiatives to manage and minimise the environmental impacts from your operations, products and services and comply with all applicable environmental laws and standards including holding any relevant permits and licenses.

Environmental Impact

You will consider the impact of your business activities on the environment and monitor environmental performance with the aim of continuous improvement over time.

Ethical Sourcing

You must exercise appropriate due diligence over your supply chain to ensure that goods and services supplied to ETEL are sourced responsibly, are free from conflict minerals where relevant, and do not directly or indirectly support human rights abuses, modern slavery, terrorism, corruption or any illegal activity.

4. GENERAL

Compliance

ETEL reserves the right to verify your compliance with this Code through audits, questionnaires, requests for documents, supplier assessments or other reasonable means. If ETEL finds that you do not comply with this Code, ETEL may require corrective action, suspend or restrict business, or terminate its business relationship and related contract(s), depending on the seriousness and circumstances of the breach.

Emergency preparedness and business resilience

ETEL expects its suppliers to have adequate emergency preparedness and response plans for safeguarding their employees, operations, and security of supply in times of natural events, major catastrophe and unforeseen events.

How to raise a concern

If you have any concerns about how this Code is being applied or become aware of an actual or suspected breach of this Code, you should immediately raise this with the relevant ETEL manager or an independent senior manager of ETEL. If the response received is not adequate, or there is a suspicion that a manager may be involved in improper conduct, the concern can be raised confidentially or anonymously by email to internalauditandfraudcontrol@ETELtransformers.co.nz.

Implementation and Application

The undersigned company will make every appropriate and reasonable effort to implement and to apply the principles and values described in this Supplier Code of Conduct both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how keeping these measures is fundamentally guaranteed. No right exists to disseminate operational, or business secrets related to competition or any other information that is in need of protection.

ETEL reserves the right at any time to (i) conduct an audit of (or arrange a third party to audit) the Supplier (and the Supplier agrees to facilitate access to its premises and those of any sub-contractors for this purpose) at ETEL's reasonable prior written request; and/or (ii) request reasonable documentation and/or completion of a questionnaire, to confirm that a Supplier complies with the above obligations. ETEL also reserves the right to restrict business or terminate dealings with any suppliers who fail to adhere to this Supplier Code of Conduct, depending on the seriousness and circumstances.

Please return a signed copy of this document confirming adherence.



Supplier

Legal entity address

Name _____

Title _____

Signature _____ .

Date _____