

PORTSTAR MACHINERY LIMITED

Supplier Code of Conduct

Version 1.0

Effective Date: 24-02-26

1. Purpose

Portstar Machinery Limited ("Portstar") is committed to conducting business with integrity, fairness, and respect for people, communities, and the environment.

This Supplier Code of Conduct outlines the minimum standards and expectations for all suppliers, contractors, subcontractors, consultants, agents, and service providers who supply goods or services to Portstar.

Compliance with this Code is a condition of doing business with Portstar.

2. Legal Compliance

Suppliers shall comply with all applicable laws, regulations, and industry standards in the countries where they operate, including but not limited to:

- Employment and labour laws
- Health and safety regulations
- Environmental legislation
- Anti-bribery and anti-corruption laws
- Trade and customs regulations
- Tax obligations
- Data privacy and information security requirements

Suppliers must maintain all required licences, permits, certifications, and registrations relevant to their operations.

3. Human Rights and Labour Standards

Portstar supports internationally recognised human rights principles and expects suppliers to uphold the same standards.

Suppliers shall:

3.1 Forced Labour

- Not use forced, bonded, indentured, prison, trafficked, or involuntary labour.
- Ensure all work is performed voluntarily.
- Allow employees freedom to leave employment with reasonable notice.

3.2 Child Labour

- Not employ children below the legal minimum working age.
- Comply with all applicable child labour laws.
- Ensure young workers are not exposed to hazardous work.

3.3 Modern Slavery

- Take reasonable measures to prevent modern slavery and human trafficking within their operations and supply chains.
- Notify Portstar immediately if any modern slavery risks are identified.

3.4 Freedom of Association

- Respect employees' rights to freedom of association and collective bargaining where permitted by law.

3.5 Fair Treatment

Suppliers shall provide workplaces free from:

- Harassment
- Bullying
- Discrimination
- Abuse
- Intimidation

Employment decisions shall be based on merit and capability.

4. Health, Safety and Wellbeing

Suppliers shall provide a safe and healthy workplace and comply with all applicable health and safety laws.

Suppliers are expected to:

- Identify and manage workplace risks.
- Provide appropriate training and supervision.
- Supply suitable personal protective equipment (PPE).
- Maintain emergency response procedures.
- Investigate and address workplace incidents.

- Promote employee wellbeing and safety culture.

Portstar reserves the right to request evidence of health and safety systems and performance.

5. Environmental Responsibility

Portstar encourages suppliers to minimise environmental impacts and support sustainable business practices.

Suppliers should:

- Comply with environmental laws and regulations.
- Reduce waste and pollution.
- Use resources efficiently.
- Minimise greenhouse gas emissions where practical.
- Manage hazardous substances responsibly.
- Promote recycling and circular economy principles.
- Protect biodiversity and natural ecosystems.

Suppliers are encouraged to implement environmental management systems where appropriate.

6. Ethical Business Conduct

6.1 Anti-Bribery and Corruption

Suppliers shall not:

- Offer, give, request, or accept bribes.
- Make improper payments to government officials or private parties.
- Engage in corrupt business practices.

Any gifts or hospitality provided must be reasonable, transparent, and lawful.

6.2 Conflicts of Interest

Suppliers must disclose any actual or perceived conflicts of interest that could influence business decisions involving Portstar.

6.3 Fair Competition

Suppliers shall:

- Compete fairly and ethically.

- Comply with competition and anti-trust laws.
- Avoid price-fixing, collusion, or anti-competitive conduct.

6.4 Fraud Prevention

Suppliers shall maintain accurate records and not engage in:

- Fraud
 - Misrepresentation
 - False invoicing
 - Financial misconduct
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7. Business Integrity and Transparency

Suppliers shall maintain accurate and complete business records.

Records relating to services provided to Portstar shall:

- Be truthful and accurate.
 - Be retained according to legal requirements.
 - Be available for review upon reasonable request where relevant to Portstar business.
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8. Information Security and Confidentiality

Suppliers shall protect confidential information received from Portstar.

Suppliers must:

- Implement appropriate cybersecurity controls.
- Protect sensitive commercial information.
- Comply with applicable privacy laws.
- Prevent unauthorised disclosure, access, or misuse of information.

Confidential information shall only be used for authorised business purposes.

9. Responsible Sourcing

Suppliers are encouraged to establish processes that promote responsible sourcing throughout their supply chains.

Where applicable, suppliers should:

- Assess social and environmental risks within their own supply chains.
 - Work to eliminate unethical practices.
 - Promote transparency and accountability among subcontractors and suppliers.
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10. Quality and Product Safety

Suppliers shall provide products and services that:

- Meet agreed specifications.
- Comply with relevant standards and regulations.
- Are safe and fit for purpose.
- Are supported by appropriate quality control systems.

Any defects, quality concerns, or safety issues must be reported to Portstar promptly.

11. Reporting Concerns

Suppliers are encouraged to report any suspected misconduct, unethical behaviour, legal breaches, or violations of this Code involving Portstar personnel or supplier representatives.

Reports will be treated confidentially where possible and investigated appropriately.

Portstar will not tolerate retaliation against any individual who raises a concern in good faith.

12. Monitoring and Compliance

Portstar may:

- Request information demonstrating compliance with this Code.
- Conduct supplier assessments or audits where appropriate.
- Require corrective action plans to address identified issues.

Failure to comply with this Code may result in:

- Suspension of work
 - Removal from approved supplier status
 - Termination of contracts
 - Reporting to relevant authorities where required
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13. Continuous Improvement

Portstar recognises that responsible business practices require ongoing improvement.

Suppliers are encouraged to:

- Regularly review their policies and procedures.
- Establish measurable improvement objectives.
- Collaborate with Portstar to enhance sustainability, safety, and ethical performance.

Supplier Acknowledgement

The undersigned confirms that they have read, understood, and agree to comply with the requirements of the Portstar Machinery Limited Supplier Code of Conduct.

Supplier Name

Company Representative

Position

Signature

Date

Portstar Machinery Limited

New Zealand

"Delivering reliable machinery solutions with integrity, safety, and responsibility."