



# Business Partners' Code of Conduct Our way of working





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## Working with us

The relationship Belron NZ Limited trading as Smith&Smith® and its affiliated companies, including those trading under the Laser® and Exceed® brands (**Group**) have with our business partners is key to our success and is supported by our ethical principles. Our suppliers are our business partners and we care about the way our suppliers (**Business Partners**) do business. References to “Us”, “Our” and “We” in this Business Partners Code of Conduct are to the Group.

The Group embraces conducting business in a safe, sustainable, responsible fair and ethical manner, in compliance with all applicable laws, regulations and internationally recognised standards. The Group is part of the Belron Group, which is a signatory to the UN Global Compact.

This Business Partners Code of Conduct (Code) sets out the minimum standards of behaviour that the Group expects its Business Partners (and suppliers in their own supply chain) to meet in the areas of labour and human rights, health and safety, environment, business integrity, privacy and supplier diversity. Compliance with the minimum requirements outlined in each area is a requirement of conducting business with the Group.

The ability of Business Partners to meet or exceed standards detailed in this Code will be taken into account by us when making procurement decisions. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract with the Business Partners. Where our procurement contracts set out more specific social, environmental and/or ethical requirements, this Code will supplement those provisions.

This Code applies to all third party Business Partners and contractors engaged to provide goods or services to the Group and its related or affiliated entities, irrespective of the geographical location of their operations.

### Scope

For the purpose of this document “supplier” means any company, corporation or other entity that sells, or seeks to sell goods or services to the Group including the Business Partner’s team members, employees, agents, subcontractors and other representatives.



## Comply with laws

We respect and support responsible labour practices as set out in the UN Universal Declaration of Human Rights and the UN Global Compact. We expect Business Partners to comply with all laws and respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

### **Non-discrimination**

Business Partners must not engage in or support discrimination in hiring, employee advancement and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes.

### **Bullying, Harassment and Disciplinary Practices**

Business Partners must provide a workplace free from the use of violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment must be prohibited by Business Partners.

### **Freedom of Association**

Business Partners must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Business Partners shall not discriminate, harass, intimidate or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

### **Wages, benefits and conditions**

Business Partners must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates). Business Partners must pay workers in a timely manner. Business Partners must also comply with all laws related to working hours and legally mandated benefits.

### **Forced and Compulsory Labour**

Business Partners must not use any form of forced, bonded, compulsory labour, slavery or human trafficking.

Business Partners must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Full compliance with the applicable Modern Slavery legislation is expected.

### **Child and Underage Labour**

Child labour is strictly prohibited. Business Partners must comply with all applicable international standards and domestic regulations relating to the employment of children. This Code does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 shall not be employed for any hazardous work or work that is inconsistent with their individual development.

## Health & Safety

The health and safety of our employees, contractors and visitors is of paramount importance – no job is so important or urgent that it cannot be done safely.

At a minimum, Business Partners must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities by:

- + Developing and implementing documented systems to identify and record work related injuries and illnesses;
  - + Complying with our safety requirements;
  - + Taking reasonably practicable steps to identify workplace hazards and minimise the risk of workplace injury, illness and disease for workers;
  - + Having systems, training and emergency equipment in place to respond to and manage incidents and emergencies.
- + Complying with all relevant laws related to Workplace Health and Safety;
  - + Developing and implementing written health and safety policies and standards;



## Environmental considerations

We aim to reduce the direct environmental impact of its operations and that of the activities in its supply chain. Accordingly, we require Business Partners to act responsibly in managing the environmental impacts of their business operations.

Our Business Partners will:

- + Comply with all relevant local and national laws and regulations on environmental laws;
- + Implement an environmental management system;
- + Strive to reduce environmental harm by minimising pollution (including greenhouse gas emissions) and waste;
- + Ensure that all packaging supplied to us is sustainably sourced, made from recycled content and recyclable where possible.

## Business integrity

We act with honesty and integrity and don't make or receive improper payments, benefits or gains. Accordingly, our Business Partners must behave ethically, fairly and with integrity in all business transactions.

At a minimum, Business Partners must:

- + Comply with applicable anti-bribery and anti-corruption laws (including but not limited to the UK Bribery Act 2010, where applicable). All forms of corruption, extortion or embezzlement are strictly prohibited. Bribes or other means of obtaining undue or improper advantage must not be offered or accepted. This applies even if it is legal or common practice in a country;
- + Conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, financial situation and performance in accordance with applicable laws;
- + Not directly or indirectly support organisations and individuals associated with illegal activities, human rights abuses or terrorism;
- + Respect intellectual property rights of the Group;
- + Have in place an active protected disclosure (whistle-blower) policy appropriate to their business that protects employee informants.



## Privacy

Compliance with privacy laws is a non-negotiable part of how we work. We expect all our Business Partners to comply with privacy laws. Our Privacy Policies at:

<https://www.smithandsmith.co.nz/legal-notices/>  
<https://www.lasergroup.co.nz/privacy> and  
<https://www.exceed.co.nz/privacy-policy/>

outline our privacy commitment and explain how we collect, use, disclose and protect our customers personal information. Business Partners must be aware of this policy and not do anything that would cause us to be in breach of it.

Business Partners must apply adequate data privacy and security protection to protect the personal information of our customers and

employees from unauthorised access, use and disclosure. Business Partners who collect, use, store or have access to our customers' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with us. This includes Business Partners not doing anything which would cause us to be perceived as acting inconsistently with our Privacy Policies.

We act with honesty and integrity and don't make or receive improper payments, benefits or gains. Accordingly, our Business Partners must behave ethically, fairly and with integrity in all business transactions.

## Diversity

We recognise that our people are our most important asset and we are committed to being a diverse and inclusive company. Business Partners are expected to respect the diversity of their workforce and others with whom they interact.

## Monitoring and compliance

We may from time to time ask for self assessments of adherence to this Code or review or audit a Business Partner's compliance with this Code. In such event the Business Partner should co-operate by providing information, documents and access to staff, as we reasonably require on a timely basis and comply with all reasonable remedial actions requested by us.

Business Partners must monitor their compliance with this Code, notify us of any significant breaches, allegations of non-compliance or investigation into non-compliance by authorities. Business Partners are expected to take all reasonable steps to address, remedy and prevent the reoccurrence of any breach of this Code.

## Enforcement

Where we have reasonable grounds to suspect a breach of this Code by a Business Partner, we may require the Business Partner to take additional steps which may include the provision of additional information or, in serious cases, submit to an independent audit at the Business Partner's premises at the Business Partner's cost.

We take this Code seriously and reserve the right to disqualify any potential Business Partner or discontinue business relationships with any current Business Partner which has failed to comply with this Code

## Raising a concern

Business Partners can raise concerns about any actual or suspected breach of this Code directly through their supplier relationship point of contact.

## Continuous improvement

Business Partners are encouraged to go beyond compliance to applicable laws and take responsibility to continually improve social and environmental conditions and ethical behaviour.

## Giving back / community engagement

We respect our role as a corporate citizen and giving back is an important part of Our Way of Working. We are determined to play an active role in our local, national and global communities in keeping with our principles and we encourage our team members and Business Partners to do the same.



[www.smithandsmith.co.nz](http://www.smithandsmith.co.nz)  
[www.lasergroup.co.nz](http://www.lasergroup.co.nz)  
[www.exceed.co.nz](http://www.exceed.co.nz)