

Accordant Group Limited

Code of Conduct for its Business Partners and Clients

Accordant Group Limited and its subsidiaries (“Accordant,” “our”) are committed to fair, honest and ethical conduct, and we expect the same from all clients, business partners and suppliers.

All clients, contractors, subcontractors, and suppliers to Accordant (“you” or a “Partner”) are expected to follow this Code of Conduct, for which the standards are laid out below. The Code of Conduct is available on the Accordant website, can be provided upon request and forms part of our Supply Agreement or such other agreement forming the basis of the relationship between the relevant Accordant entity and the Partner.

You undertake, on your own behalf and on behalf of your workers, officers, representatives, and subcontractors (as the case may be), to:

1. Observe the law

1.1. Comply, if applicable, with all legal, statutory, and regulatory requirements (including human rights, health & safety, employment standards and immigration law and regulations relating to the provision of its services).

2. Ensure employee Health & Safety

2.1 Comply if applicable, with all legal, statutory and regulatory requirements concerning workplace health and safety of workers.

2.2 Report any potential or actual breach of workplace health and safety laws or regulations, or your or our health and safety policy or procedure, to your Accordant relationship manager where such incident may affect or impact Accordant or any of its’ workers or representatives.

3. Act ethically and with integrity

3.1 Always act in an ethical manner and with integrity and honesty.

4. Financial honesty

4.1 Not engage in any actions that could result in conveying false or inaccurate financial information to Accordant and/or its clients.

4.2 Ensure that all submissions (e.g. orders, invoices, reports and rebate/discount requests, if any) made to Accordant are complete and accurate and that no information is falsified or concealed under any circumstances.

5. No unfair business practices

5.1 Comply with competition laws and regulations.

5.2 Not use market position to create restrictive practices that reduces competition in violation of competition law.

5.3 Ensure there are no agreements with competitors to set prices, or divide

clients, suppliers, or markets.

- 5.4 Ensure that representations relating to Accordant's services are accurate and truthful.

6. No Bribery

- 6.1 Not engage in any form of bribery, or make any improper payments, to influence the behaviour of any Officials, organisations, or individual for the purpose of acquiring any undue commercial advantage related in any way to Accordant's services.
- 6.2 Ensure compliance with all anti-bribery/corruption laws including, if applicable, the US Foreign Corrupt Practices Act, the UK Bribery Act, the NZ anti-bribery laws (Crimes Act) and the OECD Conventions that NZ is a signatory to.

7. Giving/receiving gifts

- 7.1 Not provide and/or accept any gifts, favours or entertainment to/from any client or Accordant employee that may create or appear to create an undue influence.
- 7.2 Any gift or entertainment provided to, or received from, a client or an Accordant employee must be a reasonable accompaniment to the business relationships and comply with Accordant's gifts and entertainment policy (an operational Management document) and must be legal.

8. No Insider trading

- 8.1 Not themselves buy or sell or suggest that a third party buys or sells shares, stock or other securities of Accordant while it is in possession of material non-public information ("insider information") relating to the company. Material information is defined as including, but not limited, to information or material which a reasonable investor would consider important in deciding whether to buy, sell or hold securities in Accordant.
- 8.2 Not pass on or disclose any insider information to any party unless:
 - a. it is lawful to do so; or
 - b. the law requires it.

9. Conflicts of interest

- 9.1 Not enter into a financial or any other relationship with an Accordant employee that creates any actual, potential or perceived conflict of interest for Accordant, such as where the personal interests of the employee are inconsistent with that of the company.
- 9.2 Not use any Accordant equipment, information, or property to conduct personal or non-Accordant business without prior permission from the appropriate Accordant manager.
- 9.3 Keep all financial or business-related activities lawful and free of conflicts in fulfilling its obligations to Accordant.

10. Confidentiality and privacy

- 10.1 Ensure the protection of Accordant and its clients' intellectual property consistent

with all applicable laws.

- 10.2 Not directly or indirectly use and/or disclose (or allow any third party to use) any of Accordant and its client's confidential and proprietary information, whether during or following the cessation of the business relationship with Accordant.
- 10.3 Ensure compliance with all applicable laws relating to data privacy and protection in collecting, use, processing, storage and/or disclosure of any data or information relating to individual persons, and employ appropriate information security safeguards and measures to protect any such personal data or information.

11. Labour and Human Rights

11.1 We are strongly supportive of all enterprises that aim to achieve freedom, fairness and dignity in the workplace and to combat modern slavery and worker exploitation in New Zealand. Accordant requires that all our partners –

- Not engage in the use of forced, bonded (including debt bondage) or indentured labour, involuntary prison labour, slavery, or trafficking of persons. This includes transporting, harbouring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.
- Uphold equal opportunities and fair treatment for employees, free from discrimination on the basis of race, colour, religion, gender, gender preference or expression, disability or age.
- Respect the personal dignity, privacy and rights of each employee.
- Maintain a workplace free from harassment (whether physical, verbal or sexual) or discrimination.
- Comply with all applicable employment standards and labour laws and immigration rules and regulations.

12. Environmental compliance

12.1 Comply with all applicable environmental safety laws and regulations.

12.2 Commit to environmental responsibility and sustainability.

13. Compliance

13.1 You undertake to ensure that where this Code of Conduct is provided to your contractors and employees who work with Accordant personnel, you will also maintain the necessary documentation to demonstrate your compliance with this Code of Conduct, should it be requested of you.

13.2 Any non-compliance with this Code of Conduct must be reported to your Accordant relationship manager, explaining the breach and how and when it arose.

13.3 A breach of this Code of Conduct by you or any person working for you or on your behalf may constitute a material breach of our business relationship and may be grounds for immediate termination of the relationship.

13.4 Any Accordant policy referred to herein may be modified at any time to take into account a changing environment for both Accordant, you, its Partner, statutory amendments and/or in the interest of maintaining best practices.

Approved by the Board of Accordant Group

Date: 23 June 2023