Gallagher Group Limited Contractor Code of Conduct

Gallagher Contractor Code of Conduct Policy

This Contractor Code of Conduct ("Code") is based on the standards and principles outlined in the UN Global Compact Ten Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

The Gallagher group of companies ("Gallagher") operate globally, manufacturing and distributing products for the agricultural and physical security sectors. Our headquarters and manufacturing hub are in New Zealand, though our supply chain is global. As a responsible global organisation with a global supply chain, Gallagher is dedicated to conducting business in a lawful manner with integrity and to high standards of business ethics.

We expect all contractors, suppliers, resellers, dealers, distributors, commission agents, channel partners, consultants and other contractors engaged by Gallagher ("Contractors") to conduct business to the same high standards.

Purpose

This Code reflects our values and our expectations, and sets out the minimum standards for the behaviour of Contractors to meet in the areas of:

- labour and human rights,
- health and safety,
- non-discrimination,
- environment and sustainability,
- business ethics and integrity, and
- cyber security and privacy.

Contractors must read, understand and ensure that their business and supply chain(s) meet these standards. Contractors must communicate this Code to related entities, their own contractors and subcontractors who support them in supplying to Gallagher, so that they are aware of, understand and comply with this Code.

Contractors' ability to meet or exceed standards detailed in this Code will be a key consideration when Gallagher makes procurement decisions as we expect all Contractors to adhere to this Code. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract with the Contractor.

This Code does not preclude Gallagher from including additional social, environmental, ethical, privacy or cyber security requirements into procurement contracts to address specific risks of an agreement.

Comply with Laws

Gallagher requires that its Contractors respect the applicable laws in the countries where they operate.

Contractors must not require employees to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. A Contractor may not require its employees to pay the employer's or agent's recruitment or any other fee for their employment.

Child labour is strictly prohibited. Contractors may only employ individuals that are the higher of:

- the minimum age of employment in the relevant country in which they operate; or
- the age for completing compulsory education in the relevant country.

Educational programs and training are not included in this limitation. Children under the age of 18 cannot be employed for any hazardous work.

In the absence of local law, the wage rate for student workers, interns, and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labour is identified, you must immediately stop using child labour and ensure there is a remediation plan in place which puts the best interests of the child first and allows the child to access appropriate education until no longer a child.

Non-discrimination

Contractors must not engage in or support discriminatory practices in hiring and employment.

Discrimination means any distinction, exclusion or preference limiting equality of opportunity or treatment, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, sexual orientation, gender identity, marital relationship status or political beliefs.

Contractors must work toward identifying and removing gender pay gaps that may exist in their workplace.

Bullying, Harassment and Disciplinary Practices

Contractors must not use 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 are prohibited. Contractors must clearly define and communicate to workers disciplinary policies and procedures in support of these requirements.

Freedom of Association

Contractors must respect their employees' freedom of association.

Wages and Benefits

Contractors must make conditions of employment clear when hiring by providing employees with written documentation which outlines the basic terms and conditions of employment in a language they can understand. Contractors must comply with applicable

laws relating to wages and benefits (including minimum wage, overtime pay, allowances and piece rates). Contractors must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner. For each pay period, workers must be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed.

Working Hours

Contractors must not require workers to exceed prevailing work hours set by local law. Also, in line with International Labour Organisation (ILO) standards, workers must not be required to work more than 60 hours per week (including overtime), except in extraordinary business circumstances with their consent. All overtime work must be voluntary. Employees should be allowed at least one day off per seven day week.

Health and Safety

Safe and Healthy Workplace

Contractors must provide a safe and healthy workplace and must identify and comply with relevant workplace health and safety laws, including:

- taking reasonable steps to minimise the risk of workplace injury, illness and disease for employees;
- providing appropriate equipment (including personal protective equipment if appropriate), resources and training for employees to safely carry out their duties;
- ensuring facilities and amenities for workers are clean, safe and meet their basic needs. As a minimum, Contractors must provide employees with drinking water, clean toilets in adequate number, adequate ventilation, emergency exits, proper lighting and access to medical care;
- prioritising the physical and mental health and wellbeing of workers and monitor the conditions at the workplace for the purpose of preventing illness of or injury to workers arising from the Contractors' business activities;
- taking proactive action to prevent sexual harassment in the workplace;
- supporting workers to raise health and safety issues or concerns without fear of disciplinary action, dismissal, or discrimination; and
- reporting any unsafe conditions or practices to the appropriate company representative.

Environmental Considerations

Gallagher is committed to creating a positive lasting impact on the environment. We look to innovate to enable a more sustainable future. The activities within our supply chain materially impact our ability to achieve this goal and we aim to work with Contractors that operate in an environmentally responsible and sustainable manner.

Environmental Laws, Permits, and Reporting

Contractors must comply with applicable environmental laws and minimise the adverse environmental impacts of their operations, products and services. Contractors must obtain, maintain, keep current and comply with necessary environmental permits, approvals, and registrations.

Product content, climate change and energy consumption

Contractors are to endeavour to develop products or services that achieve improved environmental performance across their life cycle and at the end of useful life, including low energy consumption, delivering greenhouse gas (GHG) emissions reductions and optimising product reuse or recycling.

Pollution prevention

Contractors must identify, monitor, minimise and treat hazardous pollutants released in the air, water and soil. Contractors are to work to reduce the use of raw materials and resources in their operations, as well as promote the re- use and recycling of materials.

Responsible sourcing of materials

Contractors supplying components to Gallagher must exercise due diligence to reasonably assure that the minerals they use in their supply chain (e.g., tantalum, tin, tungsten and gold) do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuse. Contractors must comply with all relevant regulations

and if agreed, provide necessary documentation to verify the sourcing of minerals, as well as display engagement with the Responsible Minerals Initiative. Contractors must also exercise due diligence to reasonably assure that the minerals they use in their supply chain are not supplied by businesses or organisations engaged in modern slavery as defined in relevant legislation.

Business Ethics and Integrity

At Gallagher, we are committed to operating our business ethically and in line with our legal and regulatory obligations. We don't make or receive improper payments, benefits, or gains. Equally, we expect that Contractors will act ethically and be honest, transparent, and trustworthy in all their dealings with others. Gallagher does not tolerate fraudulent or corrupt behaviour and has a zero tolerance policy to behaviour or incidents involving fraud and/or corruption.

Contractors must avoid actual, potential, or perceived conflicts of interest with Gallagher employees. If conflicts of interest occur, they must be disclosed in accordance with Gallaghers conflict of interest policy to ensure appropriate steps are taken to manage the conflict.

Bribery and Corruption

Contractors must comply with applicable anti-bribery and anti-corruption laws and must have adequate policies and procedures in place to monitor compliance with laws.

Gallagher prohibits bribes, pay-offs, commissions or discounts that are secret, unjustified or inflated, kickbacks and any similar types of payments or improper benefits (whether made directly or indirectly by the Contractor and whether made to public officials or other third parties). This prohibition includes "facilitation payments", which are payments made to speed up routine government actions.

It is important to note that it is a serious criminal offense to bribe or promise to bribe a public official directly or indirectly anywhere in the world. The term 'public official' can extend to politicians, public servants and any employees or contractors of government entities, companies or utilities, public international organisations or anyone standing or nominated as a candidate for public office.

Competition

Contractors must conduct their business in compliance with anti-trust and competition laws.

Contractors must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls. This includes, but is not limited to, any sanctions or regulations enacted by the New Zealand or the United States of America Governments.

Contractors must respect the intellectual property rights of Gallagher and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

Cyber Security and Privacy

Cyber Security and Privacy are non-negotiable parts of how we work. We expect our Contractors to work with us to protect Gallagher and our customers' data and networks.

Contractors must implement appropriate industry security practices or technical and organisational security measures that align with Gallagher's security policies including managing and monitoring their supply chain to protect Gallagher and our customers' data and networks from breaches and unauthorised access. Where Gallagher requires Contractors to meet specific security requirements, including the use of Gallagher approved solutions or services and / or restrictions on data storage or access / support locations, these requirements must be met.

When Contractors become aware of a material data or network breach that impacts Gallagher, they must promptly notify Gallagher. Contractors must treat Gallagher's and our customers' data as confidential information and only use that data for the purpose of providing services to Gallagher. Gallagher's Privacy Statements outline our privacy commitment and explain how we collect, use, disclose and protect personal information of individuals we deal with. Contractors who collect, use, store or have access to personal information held or provided by Gallagher must have adequate processes and effective technical security controls in place to protect personal information from misuse, interference, loss, and unauthorised access, modification, and disclosure.

Contractors must have adequate processes and controls to monitor compliance with applicable security and privacy laws and contractual obligations.

Compliance

It is expected that Contractors will maintain appropriate systems to ensure ongoing compliance with this policy.

This includes integrating due diligence into policies and management systems, identifying and assessing adverse human rights and environmental impacts, preventing, ceasing or minimising actual and potential adverse human rights and environmental impacts, monitoring and assessing the effectiveness of measures, communicating and providing remediation.

If the Contractor becomes aware of any suspected or actual breach of this policy, it must promptly notify Gallagher.

Gallagher may elect to review a Contractor's compliance with this policy. If requested, a Contractor must engage with Gallagher in good faith to provide reasonable access to information to enable this review.

If a Contractor has committed a material breach of this policy, this breach will constitute a breach of the contract with Gallagher and may result in the termination of the Contractor's arrangement with Gallagher.

Continuous Improvement

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

Gallagher's Whistleblowing Service

Acting ethically and with integrity is core to what we stand for, so we encourage you to report any concerns you have about illegal, unethical or improper conduct, or suspected violations of this Code. Gallagher's confidential and anonymous whistleblowing service can be accessed at speakup@gallagher.com.