

Supplier Code of Conduct

1. Introduction

- 1.1. At Stride our strategy is to invest in a portfolio of places with Enduring Demand - places that attract the highest demand in all market conditions.
- 1.2. Underpinning this is our Sustainability programme which has a purpose of Creating enduring shared value. Stride has developed three sustainability strategic goals:
 - a) Contribute to a resilient community
 - b) Develop shared prosperity
 - c) Protect the Planet

2. Purpose

- 2.1. Stride Property Limited (SPL) and Stride Investment Management Limited (SIML, SIML and SPL are together, Stride Property Group or **Stride**) are committed to the highest standards of social and environmental responsibility and ethical conduct. We look to engage with suppliers (and their subcontractors) who share our commitment to the same standards.
- 2.2. This Supplier Code of Conduct (**Code**) provides a framework for meaningful and collaborative partnerships that will enhance our relationships with our suppliers and our communities, increase efficiency and reduce our environmental impacts.
- 2.3. When working with our suppliers, we expect at a minimum that they comply with the laws and regulations in New Zealand, including those relating to health and safety, sustainability and environmental management, labour practice, modern slavery, materials quality, competition law and anti-corruption, data protection and privacy.

Definitions

- 2.4. Suppliers means all businesses that are involved in the supply of goods and services to Stride and/or its managed funds.
- 2.5. Stride's managed funds are those funds managed by Stride and includes Stride Property Limited, Fabric Property Limited, Investore Property Limited, Diversified New Zealand Property Trust and Industrie Property Joint Venture (including Industrie Property Nominee Limited as nominee for the Industrie Property Joint Venture, Industrie Property Tahi Limited and Industrie Property Rua Limited).

3. Scope

- 3.1. This Code relates to all suppliers of Stride.
- 3.2. As a minimum, suppliers are expected to:
 - a) Have read and understood the Code.
 - b) Met the minimum standards of the Code and act consistently with the Code throughout their operations and in their dealings with Stride.
 - c) Take reasonable steps to communicate the requirements of the Code to all employees, agents, suppliers or other third parties in their own supply chain which they engage with in the performance of services or the supply of goods to Stride.
 - d) Use reasonable endeavours to ensure the supplier's own supply chains also act consistently with this Code.
 - e) Have processes in place that allow for workers to report non-compliance with the Code.
 - f) Make available to Stride on request any information, data or reports required by Stride in relation to compliance with this Code. This may also include site visits, audits and requests for corrective action.

4. Ethical Behaviour

- 4.1. Suppliers are expected to:
 - a) Conduct their business with integrity and in accordance with applicable laws, regulations, and ethical standards of New Zealand and any other countries in which they operate.
 - b) Not engage in any corrupt practices including anti-competitive activity, bribery, extortion, money laundering or other illegal or unethical activities.
 - c) Comply with all applicable insider trading laws when in possession of information about Stride that is not available to the investing public and that could influence an investor's decision to buy or sell shares.
 - d) Disclose any actual, perceived or potential conflict of interest to Stride, including any employee or contractor of Stride who may have a financial or other interest of any kind in the supplier's business.

Supplier Code of Conduct

- a) Carry out their business dealings in a transparent, professional, and honest way.
- b) Comply with the Stride Code of Ethics - a copy of which can be found at <https://strideproperty.co.nz/about-us/corporate-governance/>.

4.2. Stride encourages its suppliers to:

- a) Offer workers adequate opportunity to voice concerns over unethical practices in a confidential and understanding environment.
- b) Be transparent about their practices and actively support sustainable policies and processes.

Quality Products and Materials

4.3. Stride is committed to using quality products and materials to create enduring value.

4.4. Suppliers are expected to:

- a) Ensure goods and services are not sourced from any entity subject to internationally recognised trade sanctions.
- b) Ensure all products and materials used in Stride managed projects meet applicable laws and standards and have undergone rigorous testing.
- c) On request, produce evidence of certifications and traceability of products used to ensure legitimacy.

5. Social Expectations

Human Rights

5.1. Stride expects suppliers to comply with New Zealand employment laws and standards and to treat their employees fairly, and to this end suppliers must:

- a) Comply with all local employment and immigration legislation.
- b) Ensure workers are treated in a manner consistent with that international human rights and labour standards (including but not limited to discrimination, equal opportunities, and child labour standards) and monitor compliance with these requirements within their supply chain.

- c) Maintain a workplace free of harassment and unlawful discrimination and in any event not engage in or permit discrimination in hiring and employment practices or harassment based on race, ethnicity, age, gender, sex, sexual orientation, gender identity, disability, genetics, pregnancy, religion, political affiliation, union membership or marital status.

- d) Respect the privacy rights of all workers, including when personal information is collected, stored, used, or shared and with respect to any employee monitoring practice.

- e) Allow all workers to communicate openly with management regarding working conditions and human rights without fear of reprisal, intimidation, or harassment in accordance with local laws and in any event in a manner that respects basic rights to open communication, direct engagement, and humane and equitable treatment.

Employee Entitlements

5.2. Suppliers must:

- a) Ensure all employees are of a legal age to be employed and comply with all legal requirements regarding the employment of young workers.
- b) Pay workers a wage that enables them to live with dignity and participate as active citizens in society
- c) Ensure workers receive wages and worker benefits that comply with all applicable local laws and are not subject to wage deductions as a disciplinary measure.
- d) Ensure employees' working hours are in accordance with legal requirements, these are monitored and required rest days are provided.
- e) Allow employees right to freedom of association and collective bargaining.

Modern Slavery

5.3. Suppliers must:

- a) Ensure all workers are voluntarily employed, lawfully entitled to work at that location and not under any form of forced, coerced, bonded, indentured or involuntary labour.

Supplier Code of Conduct

- b) Proactively identify, assess and where required by legislation, report on the risks of modern slavery practices in their business operation and supply chains. Make all reasonable efforts to ensure their business operations and supply chain are not engaged in or complicit with modern slavery.

Health and Safety

- 5.4. At Stride we want to ensure our people are healthy and return home safe and well from the workplace.
- 5.5. Stride's suppliers must comply with relevant health and safety legislation, standards, and codes of practice specific to the work being undertaken. We also require suppliers to adhere to our health and safety policies, processes and health and safety management system.
- 5.6. Suppliers are expected to:
 - a) Provide workplaces that protect workers from injury or impact from their work, both physical and mental.
 - b) Ensure employees have the required health and safety information and training to undertake their work safely.
 - c) Have a system to record, mitigate and monitor health and safety risks/events appropriate to the level of risk for the industry.
 - d) Review the health and safety standards of subcontractors before engaging them, ensuring they are competent to undertake the work.
 - e) Seek to continuously improve health, safety, and wellbeing of workers.

Community

- 5.7. Stride supports and contributes to the local communities in which we operate and encourages our suppliers to work with us to do the same.
- 5.8. Suppliers are encouraged to:
 - a) Invest in and contribute to the communities within which they operate.
 - b) Achieve and maintain a workforce that broadly reflects the communities they work in.

6. Environmental Expectations

- 6.1. Stride wants to create efficient, climate-resilient places that deliver long term value and support a low carbon future. We are committed to improving the environmental performance of all parts of our value chain.
- 6.2. Suppliers are expected to:
 - a) Comply with all applicable environmental legislation, regulations and standards and seek to proactively improve their environmental performance.
 - b) Actively manage the environmental impacts of their business and take responsibility for minimising the negative impacts of their operations.
 - c) Actively attempt to reduce environmental impact over time, both in internal operations and across supply chains.
 - d) Work with Stride to consider environmental impacts during design, selection of materials and undertaking works.
 - e) Commit to reuse and recycling of materials and minimising the amount and impact of waste going to landfill with an aim of only using what is needed.
 - f) Support Stride's emission reduction targets by proactively identifying opportunities to reduce emissions in their own business.
 - g) Report any environmental non-compliance to Stride; in particular those non-compliances occurring within New Zealand and which are linked to Stride activities and operations.

7. Stride Requirements

- 7.1. All suppliers must comply with this Code. The rights, standards and terms set out in this Code are in addition to the terms of any contract between Stride and its suppliers and will prevail over those contracts to the extent of any conflict or inconsistency. We expect our suppliers to:
 - a) Work with Stride to implement the expectations of this Supplier Code of Conduct. Where a supplier does not meet these expectations, Stride will collaboratively work with the supplier to achieve adherence.

Supplier Code of Conduct

- b) Notify Stride immediately where any non-compliance is identified.
- c) Adopt practices that deliver benefits to their own operations and supply chains and improve our combined sustainability performance over time.
- d) Take leadership in training, mentoring, reporting and putting in place corrective actions where needed.
- e) Bring to Stride's attention if we are not meeting our commitments to this Supplier Code of Conduct.
- f) Maintain and be able to provide Stride with documentation which demonstrates compliance with this Supplier Code of Conduct when requested.

8. Related Policies and Procedures

- Sustainability Policy
- Stride Code of Ethics
- Health & Safety Policy
- Community Investment and Engagement Policy
- Privacy Policy