

CODE OF ETHICS POLICY



OWNER

OFFICE PRODUCTS DEPOT National Support Centre (NSO)

Last Reviewed – July 2020 Next Review - July 2021

INTRODUCTION

This Code of Ethics Policy sets out how the OFFICE PRODUCTS DEPOT Group, employees, OFFICE PRODUCTS DEPOT Dealerships/Shareholders and their employees, and suppliers to the OFFICE PRODUCTS DEPOT Group are expected to operate.

This framework is put together to facilitate decisions that are consistent with OFFICE PRODUCTS DEPOT's values, business goals, and legal and policy obligations. OFFICE PRODUCTS DEPOT's expectation is that all engagement partners and employees abide by these standards.

OFFICE PRODUCTS DEPOT Dealerships, as outlined in our OFFICE PRODUCTS DEPOT Dealership License Agreement, and our Suppliers as agreed in our Supplier Terms of Trade Agreements, all work to common business ethics and formally as part of their respective agreements agree to operate within the OFFICE PRODUCTS DEPOT "Code of Ethics Policy"

This Policy is approved by the OFFICE PRODUCTS DEPOT Board.



CORE PRINCIPLES

Conflicts of Interest:

A "Conflict of Interest" occurs when an individual or supply partner's interest interfere or appear to interfere with OFFICE PRODUCTS DEPOT's interest. OFFICE PRODUCTS DEPOT always expects its employees and suppliers to act in the best interest of OFFICE PRODUCTS DEPOT.

OFFICE PRODUCTS DEPOT expects all employees and suppliers to disclose any potential conflict to the General Manager of OFFICE PRODUCTS DEPOT New Zealand Limited or to the OFFICE PRODUCTS DEPOT Board.

Gifts:

Gifts and personal benefits provided to any employee of OFFICE PRODUCTS DEPOT, of any value, from internal or external parties, that could be perceived to compromise or influence any decision by OFFICE PRODUCTS DEPOT, must not be accepted.

Full disclosure of gifts or personal benefits provided to employees of OFFICE PRODUCTS DEPOT, as part of normal supplier engagement, must be made through the OFFICE PRODUCTS DEPOT Gift Register.

Confidentiality:

As part of our engagement with customers and suppliers, we are entrusted with confidential information that is not in the public domain. OFFICE PRODUCTS DEPOT takes protection of all confidential information seriously and expects all employees of OFFICE PRODUCTS DEPOT and suppliers will not share, disclose or distribute any confidential information provided to OFFICE PRODUCTS DEPOT.

OFFICE PRODUCTS DEPOT recognizes that in some cases, information provided is used in the normal course of business and that in there are situations where confidential information can be shared internally. OFFICE PRODUCTS DEPOT employees will ensure any person or party receiving confidential information will be made aware of its sensitive nature and that it will not able to be shared further.

OFFICE PRODUCTS DEPOT always works to current legal obligations around confidentiality included legislation as outlined in the Privacy Act 1993.

Actions and Professionalism:

How our customers view us is critical to the performance of our business and the value of the OFFICE PRODUCTS DEPOT brand, therefore the actions of all OFFICE PRODUCTS DEPOT employees must always be professional and at the highest ethical standard.



OFFICE PRODUCTS DEPOT employees will:

- Undertake their duties in accordance with OFFICE PRODUCTS DEPOT values.
- Conduct themselves in an honest, professional and ethical manner, and in a manner that aligns with the values of the OFFICE PRODUCTS DEPOT.
- Undertake their duties with care and diligence.
- Work fairly, honestly and professionally with other OFFICE PRODUCTS DEPOT dealerships, customers and suppliers.
- Value individual differences and treat people with respect.
- Ensure OFFICE PRODUCTS DEPOT systems, data, records and documents are a true and correct record.
- Recognize positive performance, attitude and effort of others, whilst at the same time, supporting OFFICE PRODUCTS DEPOT employees that need encouragement.
- Take responsibility for their own actions and strive to be the best they can be.
- Operate in the OFFICE PRODUCTS DEPOT group in a safe manner, and within OFFICE PRODUCTS DEPOT's Health and Safety framework.

Use of OFFICE PRODUCTS DEPOT Intellectual Property, Assets and Information:

OFFICE PRODUCTS DEPOT expects all employees, OFFICE PRODUCTS DEPOT Dealerships, and employees of dealerships and suppliers protect OFFICE PRODUCTS DEPOT Intellectual Property, Assets and Information and ensure they are used correctly and in such a way that ensures the OFFICE PRODUCTS DEPOT brand and reputation is not damaged.

Management of OFFICE PRODUCTS DEPOT Intellectual Property, Assets and Information, except for that owned by individual OFFICE PRODUCTS DEPOT dealerships, is the responsibility of OFFICE PRODUCTS DEPOT Limited. (OFFICE PRODUCTS DEPOT National Support Office)

Compliance with New Zealand Laws and Policies:

OFFICE PRODUCTS DEPOT expects all employees, OFFICE PRODUCTS DEPOT Dealerships and employees of dealerships and suppliers to:

- Comply with all OFFICE PRODUCTS DEPOT policies and procedures.
- Abide by the laws, rules and regulations of New Zealand.
- Comply with all statutory and internal disclosure requirements.

Delegated Authority:

The OFFICE PRODUCTS DEPOT Board of Directors delegates the responsibility of managing the affairs at an operational level to the General Manager of OFFICE PRODUCTS DEPOT National Support Office. The General Manager, in turn, delegates to other levels of



management certain rights to make operational and financial decisions within defined and agreed limits.

OFFICE PRODUCTS DEPOT employees will:

- Only act within delegated, defined and agreed authority levels.
- Ask their manager if they are uncertain as to their delegated level of authority.

Labour Rights:

OFFICE PRODUCTS DEPOT expects all employees, OFFICE PRODUCTS DEPOT Dealerships, and employees of dealerships and suppliers to comply with the below principles relating to employment of people working in their business, and in the case of suppliers their supply chains.

- All workers are treated in a fair and professional manner.
- Employment is freely chosen, there is no forced, bonded or involuntary prison labour.
- Workers are not required to lodge deposits or identity papers and are free to leave their employment with reasonable notice.
- Bribes, gifts, favors and any form of secret or unlawful payments are strictly prohibited, with robust processes in place to ensure compliance to this principal.
- Safe and hygienic working conditions are provided along with robust management of hazards and the Health and Safety of all employees.
- Personal protective equipment/clothing, where relevant, is provided to employees.
- Regular Health and Safety training is provided, where relevant, to employee.
- The use of Child Labour is strictly prohibited.
- Wages and benefits paid to employees is based on a minimum the NZ Minimum Wage standard.
- All employees are treated in a lawful and professional manner regarding compensation and human rights.
- No employees are discriminated against based on race, religion, gender, sex, sexual orientation, disability, marital status, union membership or political affiliation.

Sourcing:

OFFICE PRODUCTS DEPOT takes sourcing products for customers seriously, not only from an environmental and sustainability perspective, but also from an ETHICAL perspective.

We work with our suppliers to ensure their sourcing of product for our customers works to our ethical principles and standards. This includes ensuring that our suppliers only work with factories and manufacturing plants that operate in an ethical manner and where modern slavery is not a factor.

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AUTHORISATION

OFFICE PRODUCTS DEPOT NZ Date: January 2020

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Grant Sheridan General Manager NZ