

Supplier Code of Conduct

August 2024

Northwest is committed to conducting business in an ethical, responsible and sustainable manner. Our Supplier Code of Conduct demonstrates the expectations we have for our suppliers to share and adhere to this commitment.

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but sets out basic principles designed to promote integrity and deter wrongdoing. All suppliers are required to familiarise themselves with this Code and must conduct themselves accordingly.

If you have any questions about the Code, you should ask a senior officer of Northwest how to handle the situation. You can contact the Regional General Counsel A/NZ of Northwest at nzaucosec@nwhreit.com.

1. Compliance with Laws and Regulations

- a. Suppliers must comply with all applicable laws, regulations and standards in New Zealand/Australia (as applicable), including environmental, labour, health and safety laws.

2. Ethical Business Practice

- a. Suppliers should conduct business with integrity, honesty and fairness.
- b. Bribery, corruption and unethical practices are prohibited and any conflicts of interest should be raised with us at the earliest opportunity.
- c. Our organisation maintains a position of political neutrality. We do not make political donations or contributions from our funds or assets to political parties, candidates, or political action committees. Suppliers are expected to respect this stance.

3. Labour and Human Rights

- a. Suppliers must uphold fundamental human rights and treat their employees with respect and dignity.
- b. Any elements of modern slavery, child labour or forced labour are unacceptable and suppliers must ensure:
 - i. There is no coercion with work undertaken
 - ii. Workers are the minimum legal age
 - iii. Support is provided in identifying areas of potential high-risk for modern slavery within supply chains with a responsibility to

communicate and contribute corrective actions to any risks identified.

- iv. Compliance with all such legislative requirements and policies in relation to the Modern Slavery Act.
- c. Suppliers must provide fair wages, safe working conditions and reasonable working hours to all employees.

4. Environmental Responsibility

- a. Suppliers should minimise their environmental impact by endeavouring to reduce waste, conserving natural resources, protecting biodiversity and adopting sustainable practices.

5. Community Impact

- a. Suppliers should consider community disruption of activities and prioritise local community engagement to minimise adverse impacts.

6. Health & Safety

- a. Suppliers must prioritise the safety and well-being of employees and contractors.
- b. Suppliers must comply with workplace health and safety laws and regulations.
- c. Suppliers must implement safety measures to prevent accidents and injuries.
- d. Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation and abuse.

7. Confidentiality and Intellectual Property

- a. Suppliers must respect and protect the intellectual property and confidential information of Northwest by way of not improperly using any commercially sensitive information in its possession or relating to dealings.

8. Reporting and Compliance

- a. Suppliers must report any breaches of the code to Northwest, all reporting will be treated with confidentiality. Reports can be made to nzaucosec@nwhreit.com.
- b. Northwest reserves the right to audit suppliers for compliance.

9. Continuous Improvement

- a. Suppliers are encouraged to continuously improve their social and environmental performance.

Acknowledgement:

By conducting business with Northwest, suppliers acknowledge and agree to adhere to this Supplier Code of Conduct.

Northwest may cease dealing with any supplier who is found to have failed to comply with the Code or communicate any self-identified non-compliance with the above points.