CODE OF CONDUCT & ETHICS

A Message from our Managing Director

At Giltrap AgriZone, our business is built on honesty, integrity, and customer service. These principles have guided our decisions for more than 60 years and remain at the heart of everything we do.

While we are one of New Zealand's largest agricultural machinery dealerships, we remain a privately owned and operated family business. We have grown because we understand the needs of farmers and rural contractors, and because we work hard to build long-term relationships based on trust, respect, and delivering on our commitments.

We are committed to doing business the right way. That means acting ethically, treating people fairly, providing a safe and respectful workplace, complying with the law, and always conducting ourselves in a manner that protects the reputation of Giltrap AgriZone.

We have invested heavily in our facilities, equipment and support systems to provide industry-leading service, but our greatest investment has always been in our people. The professionalism, knowledge and integrity of our team are what set us apart.

This Code of Conduct and Ethics outlines the standards that apply to everyone who works for or represents Giltrap AgriZone. It helps ensure that our actions reflect our values and reinforces our commitment to our customers, colleagues, suppliers and communities.

If issues arise, we are committed to working together to find solutions. We expect everyone to uphold the standards set out in this Code and contribute to maintaining the culture and reputation that generations of our people have worked hard to build.

Andrew Giltrap



Managing Director
Giltrap AgriZone

Purpose

At Giltrap AgriZone, we are committed to conducting business safely, honestly, fairly and professionally.

This Code of Conduct and Ethics outlines the standards of behaviour expected of all employees, managers, directors, contractors, labour providers and others acting on behalf of Giltrap AgriZone.

The Code supports our values, protects our reputation, and helps ensure we meet our legal, ethical and social responsibilities.

This Code should be read alongside all other company policies, including the House Rules, Health and Safety Manual, Modern Slavery Policy, employment agreements and other workplace procedures.

Our Values

The way we do business is just as important as the results we achieve.

We are committed to:

Integrity
We are honest, ethical and trustworthy in everything we do.

Customer Commitment
We build long-term relationships by understanding our customers' needs and standing behind the products and services we provide.

People
We invest in our people, support one another and recognise that our success is built on their knowledge, effort and commitment.

Safety
We look after ourselves and each other, so everyone goes home safe and well.

Accountability
We do what we say we will do and take responsibility for our actions, decisions and results.

Who this Code Applies To

- All employees.
- Directors and managers.
- Contractors and labour hire workers.
- Any person representing Giltrap AgriZone in a business capacity.

Everyone is expected to understand and comply with the standards outlined in this Code.

Respect in the Workplace

We are committed to providing a workplace where everyone is treated with dignity and respect.

Every person must:

- Treat colleagues, customers, suppliers and visitors professionally.
- Behave honestly and respectfully.
- Value differing backgrounds, experiences and perspectives.
- Contribute to a positive workplace culture.

Giltrap AgriZone will not tolerate:

- Bullying.
- Harassment.
- Discrimination.
- Non-performance.
- Victimisation.
- Intimidation.
- Threatening or abusive behaviour.

These standards apply in the workplace, at customer sites, during work-related events, online and on social media.

Health, Safety and Wellbeing

Every person has a responsibility to contribute to a safe and healthy workplace.

We will:

- Follow all health and safety requirements.
- Report hazards, incidents and near misses promptly.
- Use required safety equipment and PPE.
- Participate in health and safety initiatives.
- Support physical and psychological wellbeing.

Managers are expected to actively identify and manage both physical and psychosocial risks and support employees who raise health, safety or wellbeing concerns.

Honest and Ethical Behaviour

We act honestly and ethically in all business dealings.

This includes:

- Providing accurate information.
- Maintaining truthful records.
- Following company processes.
- Using company resources responsibly.
- Acting in the best interests of Giltrap AgriZone.

No person may engage in fraud, theft, deception or any activity intended to improperly benefit themselves or another party.

Conflicts of Interest

A conflict of interest occurs when personal interests may influence, or appear to influence, business decisions.

Examples include:

- Relationships with suppliers, customers or competitors.
- Financial interests in businesses that deal with Giltrap AgriZone.
- Secondary employment that could affect work performance or create a commercial conflict.
- Directing business opportunities to family members or associates.

Employees must promptly disclose any actual, potential or perceived conflict of interest to their manager.

Where a conflict exists, Giltrap AgriZone may require measures to manage or remove that conflict.

Gifts and Benefits

Business decisions must be made objectively and in the best interests of Giltrap AgriZone.

Employees must not:

- Accept gifts, benefits or hospitality that could influence, or be perceived to influence, a business decision.
- Offer or provide gifts or benefits intended to secure an unfair advantage.
- Seek personal gain from supplier, customer or contractor relationships.

Any significant gift, benefit or hospitality offered in connection with employment must be disclosed to the Managing Director, or in the absence of the MD, to the CFO and/or HR Advisor.

Anti-Bribery and Corruption

Giltrap AgriZone has zero tolerance for bribery, corruption or improper payments.

No employee, contractor or representative may:

- Offer, give or receive a bribe.
- Offer kickbacks or secret commissions.
- Falsify financial records to conceal transactions.
- Make improper payments to obtain business advantages.

All business dealings must be conducted transparently and lawfully.

Privacy, Confidentiality & Information Security

We are trusted with information belonging to customers, employees, suppliers and the business.

Everyone must:

- Protect confidential information.
- Comply with the Privacy Act 2020.
- Protect passwords and login credentials.
- Maintain appropriate cybersecurity practices.
- Report suspected privacy or security breaches immediately.
- Access information only when authorised.

Confidential information must not be disclosed unless authorised or legally required.

Company Property & Resources

Company assets are provided for business purposes and are not for private use.

Assets include:

- Buildings and facilities.
- Vehicles and equipment.
- Tools and machinery.
- Information systems and data.
- Company funds and purchasing facilities.

Employees must use these assets responsibly and take reasonable care to protect them from loss, damage, theft or misuse.

Modern Slavery

Giltrap AgriZone is committed to ethical employment practices and respect for human rights.

We do not tolerate:

- Forced labour.
- Child labour.
- Human trafficking.
- Debt bondage.
- Worker exploitation.
- Modern slavery in any form.

We expect our suppliers, contractors and labour providers to meet equivalent standards and comply with applicable employment and human rights laws.

Fair Dealing, Competition & Fair Trading

Giltrap AgriZone is committed to conducting business in compliance with all applicable laws, including the Fair-Trading Act 1986 and Commerce Act 1986.

Employees must:

- Provide accurate information about our products and services and avoid making false, misleading or deceptive statements.
- Honour contractual commitments and conduct business with integrity.
- Make purchasing and supplier decisions fairly, objectively and in the best interests of Giltrap AgriZone.
- Not engage in price fixing, market allocation, output restriction or any other form of cartel conduct.

- **Price fixing** is when two or more competing businesses agree, or even reach an informal understanding, about the prices they will charge rather than setting prices independently.
- Under New Zealand's **Commerce Act 1986**, price fixing is a form of illegal cartel conduct. E.G:
  - Two dealerships agree to charge the same workshop labour rate.
  - Dealers agree not to discount below a certain amount.
  - Competitors agree on a common margin for parts sales.
  - A group of dealers share future pricing plans and adjust their prices to match.
  - Competitors agree to apply the same fees such as freight
- **Market allocation**: agreeing not to target each other's customers or territories.
- **Output restriction:** agreeing to limit supply or services offered.

- Not discuss or agree pricing, margins, discounts, customers, territories, tenders or other commercially sensitive information with competitors.
- Avoid any conduct that could unfairly restrict competition or damage the reputation of Giltrap AgriZone.
- Refuse without reasonable grounds to quote or supply.

Employees who are unsure whether a discussion or arrangement may breach competition laws must seek guidance from management before proceeding.

Raising Concerns

Everyone has a responsibility to speak up if they become aware of conduct that may breach this Code, company policy or the law. Concerns can be raised with the employees manager.

Employees who raise concerns in good faith will not be disadvantaged for doing so.

Breaches of the Code

Failure to comply with this Code may result in disciplinary action, up to and including termination of employment or engagement.

Where appropriate, breaches may also be referred to regulatory authorities or law enforcement agencies.