



August 2025

Supplier Code of Conduct August 2025

Introduction and Purpose

Todd, which includes Todd Energy and Nova Energy (together Todd), is committed to conducting our business sustainably and with integrity, respect, and responsibility to people and the environment. We expect the same from our Suppliers, who are an integral part of our business.

About Todd

Todd is one of New Zealand's largest family-owned businesses and has been part of moving the New Zealand economy forward for over a century. Todd's brand, reputation and business have been built in New Zealand and are tied to this country, making Todd deeply committed to New Zealand and its future.



Further information about Todd can be found [here](#).

Supplier Code of Conduct

This Supplier Code of Conduct outlines the minimum standards that we expect from our Suppliers, including distributors, and the suppliers, affiliates, agents, trade partners, intermediaries and subcontractors (together our Suppliers) throughout their supply chain, in order to do business with Todd.

The expectations set out in this Code are not replacements or substitutes for any applicable laws, nor do they amend, supersede, or prevail over any obligations specified in a separate contract between Todd and a supplier.

Suppliers are expected to comply with all laws that apply to their own business operations and make reasonable enquiries to ensure that their suppliers do the same.

We appreciate your cooperation and support in upholding these standards. Together, we can create a positive impact on our society and environment.





1. Employment and community

Our Suppliers must ensure a safe and fair working environment that adheres to local and international laws and standards. We expect our Suppliers to treat the local communities in which they operate with respect and empathy and to contribute positively to community wellbeing.

1.1 Fair working conditions and modern slavery

Our Suppliers must provide a workplace that is free from discrimination, unfair practices and modern slavery, which refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power. Modern slavery occurs around the world, including New Zealand.

We are committed to eliminating all forms of modern slavery and unfair working practices from our supply chain and expect our Suppliers to share this commitment, ensuring freedom, fairness, and respect for all individuals in their operations and supply chains.

Specifically, our Suppliers must:

- Not use any form of forced, bonded, or involuntary labour, or employ any child labour.
- Provide fair and equal pay and benefits to all workers and comply with legal minimum wage and overtime compensation requirements.
- Not participate in irregular employment practices.
- Not discriminate against any worker on the basis of race, colour, religion, gender, sexual orientation, age, disability, national origin, or any other reason.
- Respect the rights of workers to join or form trade unions and bargain collectively, and not interfere with or retaliate against any worker who exercises this right.
- Provide a safe and healthy work environment for all workers, and track and take appropriate measures to prevent and address any occupational hazards, injuries, or illnesses.
- Not engage in or tolerate any form of harassment, bullying, abuse, or violence against any worker.
- Engage with their stakeholders on social sustainability, check their suppliers and subcontractors for modern slavery, report any suspected cases to Todd and the authorities, and work with Todd and other partners to improve their practices.

1.2 Safe working conditions

Todd endeavours to achieve industry-leading health and safety performance and is committed to providing a workplace that is safe for its personnel, Suppliers, and the public.

In line with this, our Suppliers must:

- Ensure that no business objective takes priority over health and safety.
- Demonstrate a strong and enduring commitment to ensuring the health and safety of their workers.
- Comply with relevant legislation, regulations, codes of practice and industry standards.
- Ensure their personnel comply with Todd's Health Safety and Environment policies while at Todd locations.
- Encourage their workforce to report any accident, injury, illness, or unsafe condition immediately, and stop work that could be unsafe, so that appropriate action can be taken.
- Comply with all site-specific safety management requirements.

1.3 Local community care and engagement

Suppliers should actively contribute positively to and engage with the communities they operate in to deliver tangible and enduring benefits for their communities and indigenous populations.

In line with this, our Suppliers must:

- Communicate to Todd any activities which may negatively impact or affect local communities.
- Adhere to any formal Todd engagement and/or communication plans.
- Respect and value the relationships Todd holds with indigenous peoples and their world views (including tangata whenua and First Nations).
- Consider aspirations to generate improved outcomes for Māori and First Nations people and contribute positively to these aspirations where possible.

2. Environmental

Our Suppliers must minimise the environmental impact of their operations and products and strive to improve their environmental performance.

Specifically, our Suppliers must:

- Comply with all applicable environmental laws and regulations, obtaining and maintaining all required environmental permits and licenses.
- Have environmental and sustainability values, strategies and practises that they can share with Todd if requested.
- Implement an environmental management system which identifies, monitors, and controls environmental risks and impacts.
- Reduce greenhouse gas emissions, energy consumption, water use, waste generation and natural resource consumption through efficiency measures and conservation practices.
- Avoid or minimise the use of hazardous substances in products and processes, and ensure the safe handling, storage, transportation, and disposal of such substances according to relevant laws and regulations.
- Promote the circular economy by designing products which are durable, repairable, reusable, recyclable, or biodegradable, and by participating in product take-back or recycling programmes.



3. Governance and ethical business

Our Suppliers must conduct their business with honesty, transparency, accountability and in compliance with local and international laws and regulations. They must not engage in any form of corruption or bribery in any of their dealings with us or any other party.

Specifically, our Suppliers must:

- Not offer or accept any gifts, favours, entertainment, or hospitality that could influence or appear to influence business decisions or create a conflict of interest.
- Not make or receive any payments or donations to or from any government officials or political parties for the purpose of obtaining or retaining business or gaining an unfair advantage.
- Not falsify or misrepresent any records or information related to their business activities or performance.
- Not engage in unfair or anti-competitive commercial practices (including any form of agreement or understanding with competitors that may be construed as cartel conduct).
- Disclose any actual or potential conflicts of interest that may arise in their relationship with us or any other party.
- Report any actual or suspected violations of this Supplier Code of Conduct or any applicable laws or regulations to Todd and/or the relevant authorities.
- Measure, track and report their sustainability performance according to their sustainability goals and objectives.
- Collaborate with Todd and other partners to identify and implement innovative solutions that enhance governance sustainability outcomes across the value chain.
- Comply with anti-money laundering, bribery and corruption laws, and tax and trade regulations.

4. Data and systems security

Suppliers are expected to have effective protocols in place for securing and protecting Todd's data including:

- Respecting the proprietary and intellectual property rights of Todd.
- Having data classification protocols, and adopting industry best practices on sharing, protecting and securing data.
- Observing all data privacy legal requirements on the collection, processing, storing, transfer and disposal of Todd's data.
- Reporting to Todd as soon as practically possible any suspected or actual data security incidents that impact or could foreseeably impact Todd's data, systems or reputation.
- Where a supplier wishes to access sensitive and confidential Todd data, to be granted direct access to any Todd systems or IT hardware, and/or to integrate any of its own or a third party's systems with Todd systems, the supplier shall:
- Cooperate with Todd in a timely manner and provide all reasonable information and assistance to allow Todd to conduct a cybersecurity maturity assessment.
- Comply with Todd's Information Security Management standards, policies and procedures.

5. Compliance

Suppliers are responsible for ensuring and verifying their compliance, and their suppliers, affiliates, agents, trade partners, intermediaries and subcontractors' compliance with this Code of Conduct.

We reserve the right to monitor and audit our Suppliers' compliance at any time. We may also require our Suppliers to provide us with relevant information or documentation to verify their compliance.

If we find any non-compliance issues, we may request our Suppliers to take corrective actions within a specified timeframe. We may also terminate our business relationship with any supplier who fails to comply with this Supplier Code of Conduct or refuses to cooperate with our monitoring or auditing activities.

We appreciate your cooperation and support in upholding these standards. Together, we can create a positive impact on our society and environment.