



CODE OF CONDUCT

Code of Conduct

Fero is committed to a high standard of ethics and integrity. We require all employees, customers, suppliers and others involved with the execution of Fero's business to be aware of these standards, comply with and role model these beliefs. Fero is committed to operating with best practice of ethical business behaviour. Our Code of Conduct defines the main principles underlying our business activities and requirements of those we deal with.

FAIR LABOUR CONDITIONS

- Fero will ensure that as an employer it meets all requirements under New Zealand law as an employer
- Fero will compensate its staff in a fair and reasonable way at all times
- The management of Fero will strive to ensure that all members of the team treat each other, customers and suppliers with dignity and respect at all times. Bullying, harassment or any other form of antisocial behaviour will not be tolerated
- All staff will have access to a direct manager, or failing that a senior manager, to raise concerns associated with health and safety, unfair or antisocial treatment, and the personal requirements of that person

HEALTH AND SAFETY

- Fero will ensure that a safe and healthy workplace is provided for all staff and visitors
- Fero will formally appoint a competent person to manage the Health and Safety programme and initiatives
- Fero will ensure that staff are adequately trained and communicated with to ensure their own safety

ENVIRONMENTAL

Fero is committed to conducting business in a sustainable way. We seek to minimise our environmental impact and at all times be aware of our impact on our community and surrounding environment.

MATERIAL COMPLIANCE AND CONFLICT MINERALS

Fero has a current policy on Conflict Minerals and continues to complete due diligence investigating the source of these minerals. Fero always must ensure that goods and materials are procured in a responsible manner. For further information, refer to the Conflict Minerals Policy.

BUSINESS CONTINUITY

Fero ensures that it conducts its business in a financially sustainable way and does not take unnecessary risk that will expose shareholders or stake holders to financial hardship. A regularly reviewed Disaster Recovery and Business Continuity plan is available and ready to be implemented.

SUPPLIER QUALIFICATION

Fero will take all practical steps to ensure that its supply chain is:

- Secure and continuous through the development and nurturing of relationships with suppliers, and regular audits and inspections of suppliers' facilities to ensure that they are in compliance with Fero's requirements and stipulations
- Ethical and does not involve any parties that are operating illegally, immorally or unethically
- Relevant and that products and materials are fit for purpose and comply with any required certifications
- Sourcing materials and products that are of the best suitable price and quality for the customers' requirements

CONTINUOUS IMPROVEMENT

Fero will always strive for continuous process improvement. Through regular process review, and adherence to a corrective action process, areas for improvement are identified and auctioned.

BUSINESS ETHICS

All shareholders and stakeholders in Fero shall at all times:

- Adhere to trade and export regulations
- Respect intellectual property of others and be mindful of the terms of non-disclosure agreements that Fero is beholden to
- Disclose all potential conflicts of interest to customers or suppliers
- Adhere to anti-trust and competition laws
- Refrain from all forms of corruption

RESPONSIBILITY FOR COMPANY PROPERTY

Fero endeavours to provide all stakeholders with the tools required to be effective in their roles. Company assets are intended to use for business purposes. Fero physical assets and intellectual property must be handled with care to avoid loss, theft or damage.