



SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct (SCC) of Synnex New Zealand Limited (hereinafter called “Synnex”) covers its company’s standards in ethical business practices and regulatory compliance. Synnex expects its partners in its supply chain (suppliers) to embrace this commitment for fair and legitimate business interaction. Synnex expects the value and the commitment to be exercised by all employees of its suppliers.

Compliance with the Supplier Code of Conduct

Suppliers and their employees must adhere to this SCC while conducting business with Synnex. Suppliers should require their next tier suppliers to acknowledge and implement this SCC in their operations and across their supply chains. Suppliers should promptly inform Synnex if they have encountered any violation of this SCC.

Legal and Regulatory Compliance Practices

Synnex is committed to upholding the highest levels of ethical and professional standards, conduct and compliance with the law, in all countries in which Synnex operates in or has dealings with.

All Synnex suppliers must conduct their business activities in full compliance with all applicable laws and regulations with and/or on behalf of Synnex, and must meet the following requirements:

Aspect	Details
Trade	<ul style="list-style-type: none">Comply with all applicable trade controls, as well as all applicable export, re-export, and import laws and regulations.
Antitrust	<ul style="list-style-type: none">Conduct business in full compliance with antitrust and fair competition laws that govern the jurisdictions in which they conduct business.
Anti-Corruption	<ul style="list-style-type: none">Suppliers must not participate in bribes of any kind, whether in dealing with government officials or individuals in the private sectors. Synnex is committed to complying with the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 and the anti-corruption and anti-money laundering laws of the countries in which Synnex operates in.Suppliers must comply with laws governing lobbying, gifts, and payment to public officials and other related regulations.Suppliers must not directly or indirectly offer or pay anything of value to any officials of any government, government agents, political parties to improperly influence any act or decision that promote the business interests of Synnex.



	<ul style="list-style-type: none"> Suppliers must report any personnel, representative, or partner performing unethically or engaged in bribery or money laundering.
Anti-Modern Slavery	<ul style="list-style-type: none"> Synnex is committed to complying with guidelines stipulated in the Modern Slavery Reporting Bill currently drafted for consultation. Suppliers should ensure that their business has been carefully assessed in terms of risk of having modern slavery in their operation and their supply chains.
Intellectual Property Rights	<ul style="list-style-type: none"> Suppliers shall respect intellectual property rights, any transfer of technology and know-how must be handled in a manner that protects intellectual property rights of all parties involved.

Business Practices and Ethics

All suppliers must conduct business interactions and activities with integrity and comply with the guidelines below:

Aspect	Details
Business Records	<ul style="list-style-type: none"> Suppliers should report their business information honestly and accurately and comply with all applicable laws regarding their completion and accuracy. Business records should be created, retained, and disposed of in full compliance with applicable legal and regulatory requirements.
Responsible Sourcing of Materials	<ul style="list-style-type: none"> Suppliers are expected to exercise due diligence to reasonably assure that tin, tantalum, tungsten, gold and other precious metal in the product it manufactures does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuse. Suppliers shall not direct or indirectly support organisations and individuals associated with illegal activities, human rights abuses, or terrorism.
Press	<ul style="list-style-type: none"> Suppliers should only speak to the press on behalf of Synnex if expressly authorised in writing to do so by Synnex.
Gifts and Entertainments	<ul style="list-style-type: none"> The giving, receiving or exchange of gifts, meals, incentives, entertainment and/or travel ("GMET") should be conducted while complying with the following: <ul style="list-style-type: none"> Compliance with anti-corruption laws The GMET must be legitimate for business purposes The above must not place the recipient under any obligation, influence any act or decisions by the recipient. The GMET must be made openly and transparently, be reasonable in value, and appropriate to the business relationship.



	<ul style="list-style-type: none"> ○ Synnex employee will not accept any GMET with a value of over NZ\$200 without first declaring and obtaining approval from their manager/director. ○ GMET must not be provided on a recurring basis and/or broken down into parts of less than NZ\$200.
Conflict of Interest	<ul style="list-style-type: none"> ● Avoid actual improprieties and conflicts of interests or the appearance of either. ● Supplier should have internal policies and procedures to declare any personal relationships or potential conflicts of interest relating to their own suppliers / customers. ● Suppliers must not deal directly with any Synnex employee whose related parties (such as spouse) holds a financial interest in the supplier.

Human Right and Labor Practices

Synnex expects its suppliers to fully comply with all employment laws and share their commitment to respect all human rights and to provide equal opportunity in the workplace.

Aspect	Details
Discrimination	<ul style="list-style-type: none"> ● Suppliers must commit to a workplace free of harassment and unlawful discrimination. Proper channels should be provided to employees to report their concerns to the attention of management for appropriate resolution. ● The reporting procedures should be reviewed regularly to ensure its effectiveness.
Child Labour	<ul style="list-style-type: none"> ● Child labour must not be used under any circumstances. ● Suppliers must not employ anyone under the age of 15, under the age for completing compulsory education, or under the legal minimum working age for employment. ● Suppliers are required to have a remediation plan in place to ensure that, in the event of any child labour found, Suppliers must follow international standards and local legal requirements to address the issue.
Forced Labour	<ul style="list-style-type: none"> ● All forms of forced labour by suppliers are prohibited, including but not limited to, indentured labour, bonded labour, or any other form of forced labour. ● Support for or engagement in any form of human trafficking or involuntary labour through threat, force, fraudulent claims, or other coercion is prohibited.

	<ul style="list-style-type: none"> • Suppliers must have a voluntary labour compliance plan in place that provides training to Suppliers’ staff, in order to raise awareness of issues related to forced labour. • Suppliers should have details on the remediation plan/action that Suppliers could provide in case of any violations.
Employment Contract	<ul style="list-style-type: none"> • Formal employment contract should be signed between Suppliers and their employees.
Fair Compensation	<ul style="list-style-type: none"> • Suppliers should provide fair compensation for all employees and workers, including employees who are permanent, temporary or dispatched, migrant workers, workers with disabilities, apprentices, and contracted workers. Such compensation must meet the legal minimum standards.
Working Hours	<ul style="list-style-type: none"> • Suppliers are prohibited from requiring workers to work more than the maximum hours as set by international standards, locals and national laws. • Overtime should be voluntary and paid in accordance with local and national laws or regulations. • Suppliers must keep employees’ working hour and pay records in accordance with local and national laws or regulations.

Occupational Health and Safety (OH&S)

Suppliers are expected to develop and implement health and safety management practices in all aspects of their business.

Aspect	Details
Law and Regulations	<ul style="list-style-type: none"> • Supplier must ensure compliance with all applicable occupational health and safety laws and regulations, including laws and regulation related to occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, machine safeguarding and sanitation, etc.
Health	<ul style="list-style-type: none"> • Ensure access to clean toilet facilities, safe water, sanitary food preparation, storage and eating facilities.
OH&S Management System	<ul style="list-style-type: none"> • Establish a management system that demonstrates that health and safety management is integral to the business and Suppliers should encourage employees to participate and provide input into the system. • Channel should be provided to employees for access of OH&S information.



Environmental Consideration

Suppliers are expected to minimise the adverse environmental impact of their operations, products, and services.

Aspect	Details
Environmental Laws, Permits and Reporting	<ul style="list-style-type: none">• Supplier must ensure compliance with all applicable environmental laws, standards and notices from regulations. Suppliers shall obtain, maintain, keep current necessary environmental permits, approvals and registrations.
Product Content	<ul style="list-style-type: none">• Suppliers shall deliver electrical or electronic equipment in line with relevant regulations in the region of operation and of intended equipment use.• Suppliers shall develop products or services that achieve improved environmental performance across the product lifecycle including low energy consumption, minimise hazardous material, low carbon emission and facilitating product recycling and reuse.
Pollution Prevention and Resource Efficiency	<ul style="list-style-type: none">• Suppliers must identify, monitor, minimise and treat hazardous pollutants released to air, water and soil.• Suppliers shall work to reduce the use of raw materials and resources in their operations, as well as the elimination, substitution, re-use and recycling of materials and solid waste.

Privacy

Synnex [Privacy Policy](#) outlines its privacy commitment and explains the collection, handling, use, disclosure and protection of its business partner's confidential information. Supplier must apply adequate data privacy and security protection to protect the confidential information from unauthorised access, use and disclosure.

Raising concerns and queries related to this SCC

To report any questionable behaviour and queries about this SCC, please contact your primary contact window at Synnex. If this is not possible or appropriate, please contact Synnex below:

By phone: +64 9 272 8833

By fax: +64 9 272 8830

By email: nzbqm@nz.synnex-grp.com

By mail: The Supplier Code of Conduct Team
PO Box 251133, Pakuranga, 2014