

1. INTRODUCTION

At Steel & Tube our vision is to create an organisation that is proudly representative of New Zealand / Aotearoa and our communities. We are committed to providing everyone with a safe and supportive environment where everyone's voice matters, opportunities are equitable, a place where everyone can be themselves and thrive.

2. WHO IT APPLIES TO

This policy applies to everyone – the Board of Directors, Management and the entire Steel & Tube team (including secondees, consultants and contractors).

3. WHAT IS DIVERSITY AND INCLUSION?

"Diversity" refers to all the ways in which we differ. It includes visible things such as age, gender, ethnicity, physical appearance/disability and nationality, as well as underlying differences such as thinking styles, religion, sexual orientation, cultural background and family status.

"Inclusion" refers to creating a work environment and culture where all differences are valued, respected and celebrated. Where everyone has a has the opportunity to learn, develop, contribute and achieve at work.

4. STEEL & TUBE'S APPROACH TO DIVERSITY AND INCLUSION

We believe that by creating an environment where diversity is recognised, valued, respected and celebrated it has a positive impact on the wellbeing of our people, enhances our productivity, gives us competitive advantage and ultimately sustainable business success.

Key Principles:

- Promote a culture of inclusion that values, celebrates and respects individual differences
- Foster a company culture where every voice is welcome, heard, and respected
- Ensure our work practices and workplace facilities provide the flexibility needed to support an inclusive and diverse culture
- Provide fairness to everyone in decisions around development and career path progression
- Recruit, develop, promote and reward equitably on the basis of merit

5. WHAT WILL WE DO?

The following outlines the key focus areas where we will actively work to encourage and improve diversity and inclusion.

Key focus areas:

Recruitment, Selection and Retention

We are committed to attracting, selecting and retaining high performing people and we will appoint and promote based on merit.

We will actively work to raise awareness and remove conscious and unconscious bias in recruitment and selection process.

Reward and Recognition

We are committed to making sure our people are recognised, rewarded and paid fairly and consistently based on their roles and responsibilities, performance and their contribution to achieving our company goals and objectives.

STEEL & TUBE HOLDINGS DIVERSITY AND INCLUSION POLICY



We will use the data available to us to make sure we are addressing any disparity.

Flexibility

We understand that our people have a wide range of needs and responsibilities - so where it's practical for our teams to accommodate it, we will provide flexible work practices and facilities to support them.

To ensure consistency across the business any requests for flexible working will be considered by Managers as well as the People & Culture team.

Employee Engagement

We will regularly conduct a workplace culture survey to get feedback from our people and we will use that feedback to continually improve our workplace and culture.

How included our people feel at Steel & Tube will always be part of, and a priority in the survey.

Behaviour and Respect

We believe everyone at Steel & Tube should be treated with respect at all times.

We have our required standards of behaviour covered in the Code of Conduct and the Bullying & Harassment policies.

We are committed to creating an environment where people can be their authentic self so any behaviour or conduct that goes against these policies will be treated seriously.

6. DIVERSITY AND INCLUSION MEASURABLE OBJECTIVES

The measurable objectives will form part of the People & Culture plan each year and they will be agreed and approved by the Board. The objectives will be communicated to the business each year and along with the progress made year on year.

7. ROLES AND RESPONSIBILITIES

Steel & Tube Board of Directors: Approve the Diversity & Inclusion measurable

objectives.

Annually review Diversity & Inclusion measures and

progress against those objectives.

Chief Executive Officer: Sponsors Diversity & Inclusion initiatives.

Ensures compliance with policy.

GM People & Culture: Recommends Diversity & Inclusion initiatives that form

part of the P&C plan.

Drive & Lead Diversity & Inclusion initiatives. Maintains Diversity & Inclusion measures.

Prepares annual Diversity & Inclusion report for Board

review.

Ensure training is provided to support the objectives

of this policy

Managers: Act in a balanced non-discriminatory manner when

making all employment-related decisions.

STEEL & TUBE HOLDINGS DIVERSITY AND INCLUSION POLICY



Be aware of and manage for unconscious biases and work practices which may lead to exclusion or

unintended discriminatory consequences.

Ensure our workplaces are free of inappropriate behaviour that detracts from principles of Diversity &

Inclusion.

Be involved in and lead Diversity & Inclusion initiatives.

Ensure compliance with this policy.

Behave in a manner that meets the standards and

obligations expected of them.

Never discriminate and/or harass any other person. Proactively support Steel & Tubes commitment to and

initiatives around Diversity & Inclusion.

8. OWNERSHIP AND REVIEW

All Employees:

Approver: Steel & Tube Board
Reviewer: Steel & Tube Board
Owner: GM People & Culture
Review: Three Yearly or as required

Date: 15 August 2024