

# Sustainability Policy

---

**Purpose** The purpose of this policy is to articulate the company’s commitment to long term sustainable business performance.

**Application and Compliance** This policy applies to all of Steel & Tube and its subsidiaries.

**Scope and who the Policy Applies to** This policy applies to all directors, managers, employees, temporary staff, contractors and consultants of Steel & Tube.

**Principles** The company is committed to creating a sustainable future for our planet and society. We recognise the importance of protecting the environment, conserving natural resources, and promoting social and economic well-being. We acknowledge that an integrated approach, through effective risk management, collaboration, innovation, stakeholder engagement and leadership will ensure the company meets its sustainability-related goals. The company will be diligent when considering the commercial impact of its sustainability-related decisions. It is an inherent accountability to shareholders, customers, employees, our communities, the environment and ethical business practices that motivates and anchors us.

**Environmental Stewardship** We will minimise our environmental impact by implementing sustainable practices throughout our operations. This includes actively reducing our greenhouse gas emissions, conserving energy and water, minimising waste generation, and promoting responsible waste management.

**Resource Conservation** We will make efficient use of natural resources by adopting responsible resource management practices. This includes monitoring and reducing our consumption of resources such as water, energy, raw materials, and waste. We will also prioritise the use of renewable resources and strive to reduce our reliance on non-renewable resources.

**Biodiversity Protection** We will respect and protect the natural biodiversity and ecosystems in which we operate. We will promote responsible land use, habitat protection, and ecosystem restoration efforts. We will also seek to understand our impact on wildlife and their habitats.

---

**Social Responsibility**

We will prioritize the well-being of our employees, customers, and communities by promoting fair labour practices, human rights, and social equity. We will provide a safe and healthy work environment, promote diversity and inclusivity, and foster a culture of respect. We will also engage in community initiatives, contribute to local economic development, and support charitable causes that align with our sustainability goals.

---

**Supply Chain Sustainability**

We will collaborate with our suppliers and partners to promote sustainability throughout our supply chain. This includes encouraging responsible sourcing practices and working with suppliers who demonstrate a commitment to social and environmental responsibility.

---

**Innovation and Continuous Improvement**

We will foster a culture of innovation and continuous improvement by seeking out and implementing new technologies, practices, and strategies that contribute to sustainability. We strive to regularly review and update our sustainability goals and performance metrics to ensure our efforts are effective and aligned with best practices.

---

**Transparency and Reporting**

We will maintain transparency in our sustainability efforts by regularly reporting on our progress, challenges, and achievements in line with New Zealand best practice. We will communicate our sustainability initiatives and performance to our employees, customers, shareholders, and other stakeholders through various channels.

---

**Sustainability Systems & Programmes**

- The company has systems and programmes in place to contribute to social cohesion, minimise environmental harm and ensure good corporate governance practices
- Reports will be provided to the board to validate the effectiveness of these Sustainability Systems and Programmes

---

**Sustainability Initiatives**

- The company will develop sustainability initiatives that align with our strategic goals and contribute to honouring our commitments outlined in this policy
- Reports will be provided to the board to allow for regular monitoring on progress against these initiatives
- Reports will be compiled with reference to relevant global frameworks where practical

---

**Responsibilities**

- The board ensures there are clear accountabilities for oversight of systems and programmes and implementation of strategies designed to achieve our business objectives and deliver on commitments to our many stakeholder communities
- CEO: Ensures there are clear roles and responsibilities for managing environmental, social and governance related processes to deliver on our goals
- Sustainability Manager: Preparation of board and shareholder reports, measuring and reporting of progress against environmental-related goals and commitments, driving and delivering sustainability initiatives that aim to reduce the company's carbon footprint
- Company Secretary: Preparation of board and shareholder reports, measuring and reporting of progress against governance-related goals and commitments
- General Manager – People & Culture: Preparation of board and shareholder reports, measuring and reporting of progress against social-related goals and commitments
- General Managers: Measuring and reporting of progress against goals
- All staff and contractors: Awareness of this policy and engagement in a proactive manner to support Steel & Tube's goals

---

**Ownership and Review**

This policy replaces the existing Sustainability Policy dated May 2021.

Approver: Steel & Tube Board

Reviewer: Steel & Tube Board

Owner: Company Secretary

Review: Two yearly or as required

Date: 23 June 2023

---