

Ethical Trading Policy

Version 1.0

Owner –GM of People & Culture

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ETHICAL TRADING POLICY

PURPOSE AND SCOPE

Hilton Haulage Limited Partnership (HHLP) recognizes its duty in making sure it applies ethical and sustainable work practices across its entire operations. This includes all employees as well as labour hire or temping resources sourced. HHLP is responsible for ensuring employees receive their employment rights and are treated fairly at work.

The Board of Directors along with The Senior Leadership team are responsible for ensuring ethical and sustainable practices are in place, review compliance of such and take corrective actions when required.

Each employee has a duty to cooperate with management so far as is necessary to enable HHLP to fulfill its statutory obligations, this includes:

1. Co-operating in the introduction and operation of all measures designed to fulfil management's obligation under this policy.
2. Raising and escalating actual or potential problems.
3. Suggesting ways in which ethical trading practices could be improved.

This policy applies to all employees of HHLP.

ETHICAL & SUSTAINABLE WORK PRACTICES

Ethical means engaging in work practices that are legal, fair and ensure decent treatment of your workforce, by providing conditions that do not cause physical or mental harm to workers. In New Zealand all employees have minimum employment rights. The minimum rights of an employee are the responsibility of the organisation (HHLP). The following are some examples of what is in place to protect employees at work:

- Minimum Rights – e.g., Leave, minimum pay rates, meal and rest breaks
- Employment agreements
- Policies/procedures on dealing with employment relationship problems
- Pay and employment equity
- Use of fixed-terms where appropriate
- Flexible working arrangements
- Health and Safety
- Record keeping (holidays and leave, and wages and time)
- Union

Sustainable means engaging in work practices that meet current needs in a durable and lasting way that does not compromise the future of our business and/or industry.

HHLP understands its obligations in relation to ethical and sustainable work practices and has put steps in place to ensure it will respond to incidents of exploitation, both locally and globally. That includes steps to

respond to wage underpayments, harmful working conditions, child labour, forced labour, human trafficking, and modern slavery.

Furthermore, and in broader terms HHLP recognises and supports the work and objectives from the United Nations (UN) on the Sustainable Development Goals. The Sustainable Development Goals are the blueprint to achieve a better and more sustainable future for all (see appendix for additional detail).

KEY PRINCIPLES APPLIED @ HHLP

HHLP applies the following principles when conducting business activities:

- Acting in an ethical and sustainable manner above and beyond basic legal requirements.
- All employees are treated fairly with full consideration for their basic human rights.
- A commitment is made to follow and implement the principles of the Bill of Rights Act 1990, Human Rights Act 1993, the Employment Relations Act 2000, the Wage Protections Act 1983, The Holidays Act 2003, and the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).
- All employment is freely chosen with employees free to leave Hilton Haulage after reasonable notice. Use of forced, bonded, indentured or involuntary prison labour is prohibited.
- No child labour is used.
- HHLP (and employees) have a duty to act in good faith.
- Appropriate compensation is paid for work performed.
- Employees are given written terms and conditions of employment that detail the employment relationship and the parties' respective obligations, including for example rates of pay, working hours, sick pay rules, notice periods for termination of employment.
- No deduction is made from wages or salary as a disciplinary measure, and relevant payslips detailing any lawful deductions are provided for each pay period.
- Temporary labour is not used as a means to avoid obligations under labour or social security laws.
- Working hours are safe and reasonable.
- The Health and Safety policy is in place and is regularly reviewed and communicated to employees.
- Working conditions are safe and hygienic and fit for purpose (e.g., providing general necessities such as toilets etc).
- Employees receive regular Health and Safety training.
- No discrimination is practised in pay, hiring, compensation, access to training, promotion, termination of employment or retirement, on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.
- Freedom of association and the right to collective bargaining is respected.
 - Workers have the right to join a recognised trade union of their own choosing and to bargain collectively.
 - HHLP adopts an open attitude towards the activities of trade unions and their organisational activities; workers representatives are not discriminated against and have access to carry out their respective functions in the workplace.
- No harassment, threats, abuse, or intimidation is practiced or tolerated.
- Any verbal, physical and sexual threats, harassment, or intimidation are expressly prohibited and represent potential grounds for summary dismissal (following an employment investigation).
- A culture of raising matters about wrongdoing is encouraged to protect against reprisal or disadvantage.
- A proactive approach is taken in:
 - Communicating HHLP's Code of Conduct and respective workplace policies & procedures to all employees.
 - Ensuring robust systems and processes are in place.
 - Educating employees and managers on their employment responsibilities and rights.

- Measuring ethical and sustainable practices by reporting on Key Performance Indicators. (TRIFR, training records, number of grievances etc).

DEFINITIONS

Employment Rights

In New Zealand all employees have minimum employment rights. These rights cannot be contracted out of and they apply even if the employee agrees otherwise. These rights also apply whether or not they have been included in an employment agreement

Employment Standards

Employment standards are a subset of employment rights. They are specifically defined in section 5 of the Employment Relations Act 2000 which provides:

"Employment standards means any of the following:

- requirements of any of sections 64, 69Y, 69ZD, 69ZE, and 130 of the Employment Relations Act 2000 (*employment agreements, breastfeeding, rest and meal breaks, wage and time records*)
- provisions of the Equal Pay Act 1972 (*equal pay*)
- minimum entitlements and payment for these under the Holidays Act 2003 link) (*annual holidays, family violence leave, bereavement leave, alternative holidays, public holidays, sick leave*)
- requirements of sections 81 and 82 of the Holidays Act 2003 (*holiday and leave records*)
- minimum entitlements under the Minimum Wage Act 1983 (*minimum wage*)
- provisions of the Wages Protection Act 1983 (*wages, salaries and other remuneration*)."

Labour Rights

Labour rights are broader than employment standards and employment rights, covering how all workers (employees, contractors and workers in an organization's supply chains) are treated.

Human Rights

Human rights are broader than employment standards, employment rights, and labour rights. They include various labour rights and more general human rights, e.g., the right to health and safety, right to life, right to the freedom from torture, and right to the freedom of expression.

APPENDIX: UNITED NATION (UN) SUSTAINABLE GOALS

There are 17 UN Sustainable Goals, referenced below are the ones that overlap with the principles of the Ethical Trading Policy:

[GOAL 1: No Poverty](#): End poverty in all forms everywhere

[GOAL 3: Good Health and Well-being](#): Ensure healthy lives and promote well-being for all at all ages

[GOAL 5: Gender Equality](#): Achieve gender equality and empower all women and girls

[GOAL 6: Clean Water and Sanitation](#): Ensure availability and sustainable management of water and sanitation for all.

[GOAL 8: Decent Work and Economic Growth](#): Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

[GOAL 10: Reduced Inequality](#) Reduce inequality within and among countries.