

THE FB WAY

*Fletcher Building
Code of Conduct*



Our Code covers

Introduction	3
Our Values	4
Operating Safely and Responsibly	6
Safety and employee wellbeing	7
Our Life Saving Rules save lives	8
Environment and sustainability	9
Engaging with our communities	11
Management of crises	12
Act with Integrity and Honesty	13
Inclusion and diversity	14
Bullying and harassment	15
Conflict of Interest	16
Anti-bribery and corruption	17
Receiving gifts and hospitality	18
Providing gifts and hospitality	19
Using a corporate credit card	20
Travelling for work	21
Protecting our Assets	22
Protecting company resources	23
Committing to contracts and spending money	24
Provide accurate and complete financial information	25
Protecting company information	26
Using our digital systems	27
Speaking on behalf of Fletcher Building	28
Use of social media	29
Complying with the Law	30
Competing fairly	31
Continuous disclosure and insider trading	32
Keeping personal information safe	33
Consequences of breaches of Code of Conduct	34

Speaking Up	35
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For over 100 years, thousands of people have chosen to work for Fletcher Building and help build loyalty and trust in our brands and our businesses.

Our people are our greatest asset, and we reflect this in our values. We all have a part to play in nurturing and fostering a culture that's safety-led, inclusive and enables us all to thrive.

Being a company that's fair and treats its people, stakeholders and customers with respect is essential to maintaining our reputation in the market.

Here at Fletcher Building, doing the right thing matters. We are accountable for our actions and for living and championing our values.

Our Code of Conduct, The FB Way, provides an overview of our shared Values.

It sets out a common framework around how we are expected to behave and to do the right thing for the benefit of all our stakeholders including our people, customers, communities and shareholders. It defines the standards Fletcher Building will uphold as a responsible employer and is supported by various policies.

The FB Way applies to everyone who works here from individuals to teams to whole business units. Everyone plays by the same rules.

Please familiarise yourself with this guide and keep it at the heart of everything you do for us.

With thanks,

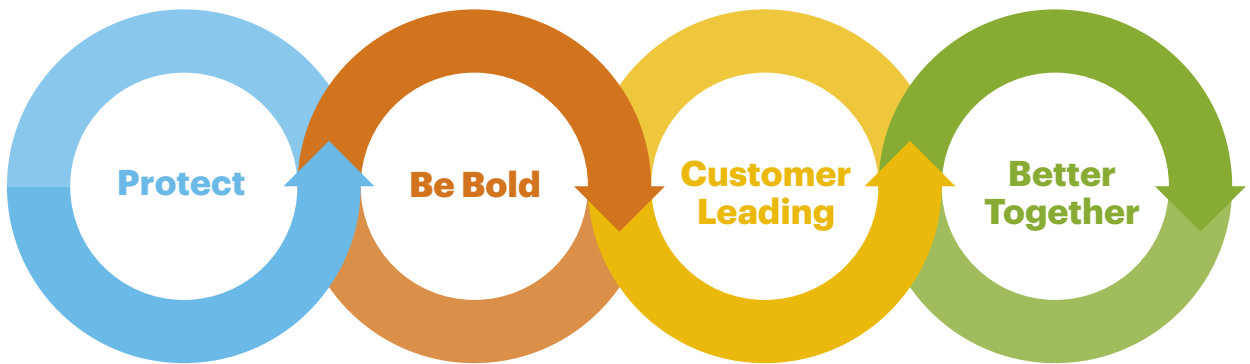
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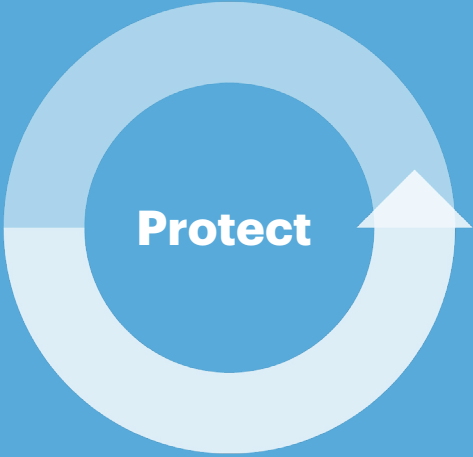


— Our Values

We're a people-led business. We're proud of our heritage which is reflected in our values which illustrate our spirit, business philosophy and operating practices. Our values guide our behaviour across all business activities every day.

We encourage you to find your own connection to these values, so they're more meaningful and relevant to you. We have four values that play an important role in our business and support our Strategy.





Protect

- **Believe all injuries are preventable**
- **Never walk past – speak up and act**
- **Celebrate the good stuff**
- **Care for each other**

Protect is a value because safety and protecting our people has to stand out. Safety needs to be a focus for everyone across our organisation. It starts with a belief that all injuries are preventable, and that together we can strive towards zero injuries. We should all expect to go home free from harm every single day. To achieve this will take commitment from every single one of us.



Be Bold

- **Be curious**
- **Have a go**
- **Strive for growth**
- **Find a better way**

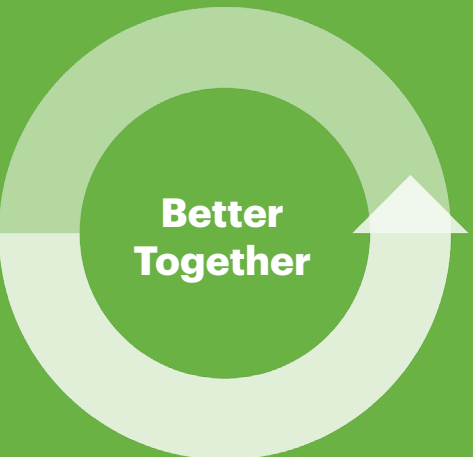
Being Bold is about innovating and growing, and in order to do this, we need to create an environment where everyone can share ideas and have a go.



Customer Leading

- **Put yourself in their shoes**
- **Anticipate and create solutions**
- **Make it easy**
- **Bring the wow!**

Customer Leading means listening, understanding, and knowing our customers and giving them products and services, they value and want.

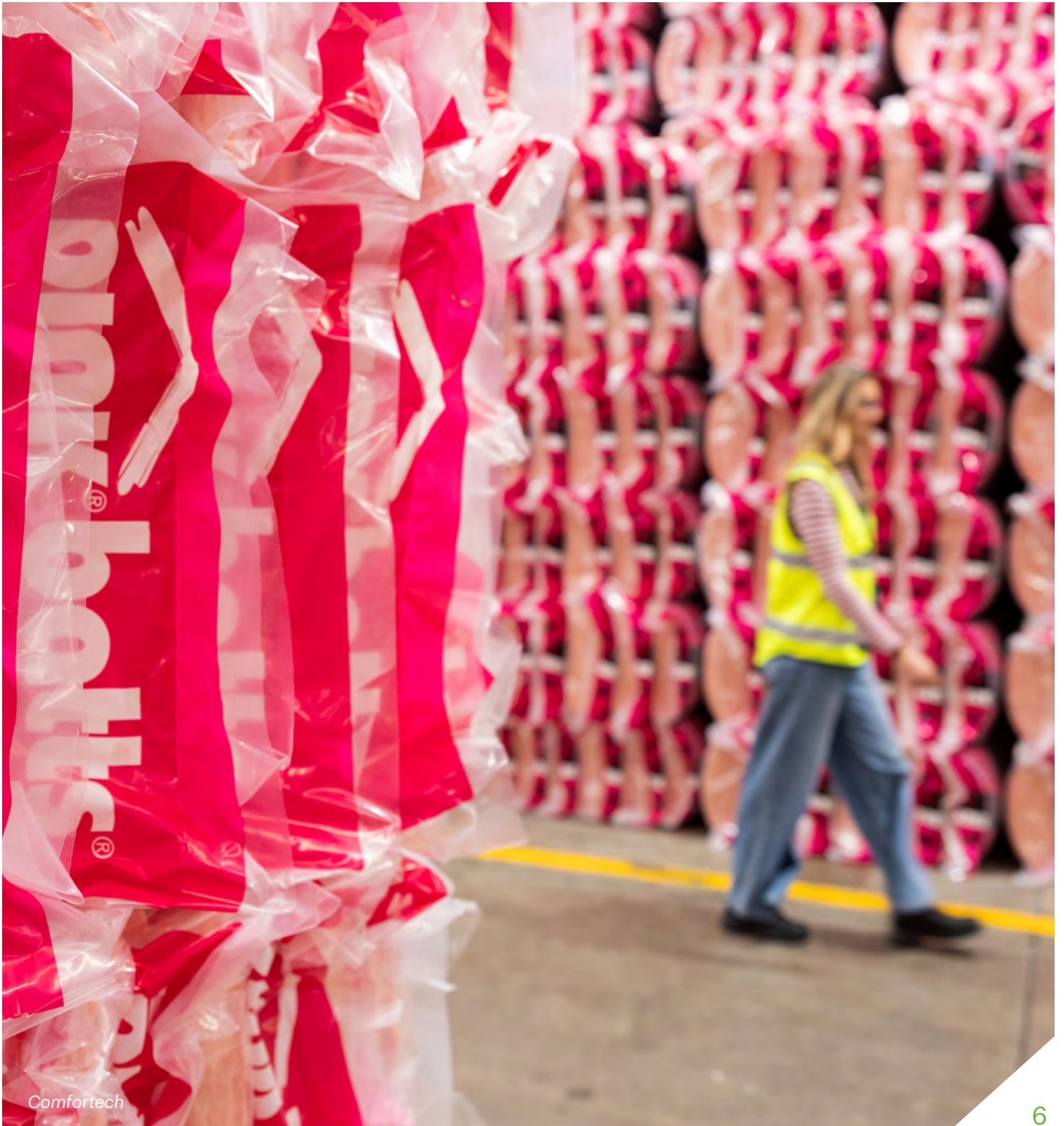


Better Together

- **Enable diversity, include others and their ideas**
- **Play fair**
- **Be honest and transparent**
- **Team up, learn from each other and achieve more**

Better Together means we have diverse skills, ideas, and experiences, and through learning from one another, can create better results than we ever expected.

Operating safely and responsibly



Safety and wellbeing

The health, safety and wellbeing of our people always comes first. Our commitment to providing a safe work environment is instilled through our culture and continuous improvement. Ensuring the safety of yourself and those around you, is what it means to be a part of the team. We expect everyone to behave in a safe and responsible manner, at all times.



What this means for you

- Look out for yourself and your workmates by never walking past – speak up and take action when you see something that looks dangerous or doesn't feel safe.
- Report all hazards, incidents and near misses so we can all learn and take action to avoid future harm.
- Take care of yourself and your workmates – always come to work fit and capable of doing your job safely; don't put anyone in harm's way and always look out for each other.
- Always follow the Life Saving Rules – they are there to save you and others from serious or fatal injuries.
- Understand and comply with the obligations you have under our Health and Safety policies (including any and all Business Unit/Division specific policies). and Health and Safety law.

We believe we all play a pivotal part in supporting and fostering our safety culture. We expect our leaders to do all they can to protect our people and the environment from harm, and to promote a healthy working environment with a culture of continuous improvement.

Our leaders strategic and operational objectives and targets to support this vision, and we adhere to all regulatory and relevant industry standards at a minimum.

We are guided by the following safety leadership principles:

- All injuries can be prevented
- Everyone's participation is essential
- We are all accountable for safety performance
- All operating exposures can be safeguarded
- Training and equipping people to work safely is essential
- Working safely is a condition of employment
- Safety focused conversations and feedback are a must
- Leaders promote off-the-job wellbeing and safety
- Safety learnings must be shared

Our Life Saving Rules save lives

We carry out some dangerous activities, such as working at heights, working with heavy machinery, and operating in quarries and on construction sites. So, it's paramount we keep ourselves and others safe at all times. Critical risks are the most dangerous risks to life that may be present in your workplace and require careful safety management.

To ensure we continually focus on these risks, we have a simple set of Life Saving Rules. They keep you and others safe and must be followed.

Critical risks vary depending on where you work, or what you are working on, so the specific Life Saving Rules for your workplace will be made clear to you.

Once you know and understand the Life Saving Rules for your workplace and how they apply to you, they can't be broken without consequences.

Deliberate breaches of the Life Saving Rules amount to serious misconduct and will result in a formal disciplinary investigation.

The Life Saving Rules can save your life and the lives of others. If you do not follow them, you are choosing to put yourself and others in danger.

Every business unit has its own Life Saving Rules. Ask what these are before you start work at a new site.

There are two Life Saving Rules that are common to all business units and always apply to everyone who works at Fletcher Building.

These are:

1. We always obey exclusion zones
2. We always work free from the influence of drugs or alcohol

You will learn more about these and our other safety rules in your workplace.

Q+A

Q

If I suspect a Life Saving Rule is being broken, what should I do?

A

Firstly, stop work and ask others to do the same. It's important that all immediate steps are taken to prevent serious harm. Ask a manager or supervisor to check that the Life Saving Rules are being followed.

You are always encouraged to stop work and check rather than allowing something to continue that may cause harm.

Q

I suspect one of my colleagues is working under the influence of drugs or alcohol.

What should I do?

A

Immediately raise your concerns with your manager or with your local People and Performance team.



Environment and Sustainability

We have a genuine commitment to making a positive impact environmentally and socially.

We have set long term goals to work toward a net positive environmental impact, starting with a focus on reducing carbon emissions across our business. We have a carbon reduction plan for each of our businesses, and we welcome ideas and initiatives from our people to find ways to reduce energy and fuel use, and to work with our supply chain on energy efficiency.

We also want to reduce our material use and minimise waste within our business, and to encourage our suppliers to do the same.

We encourage all our people to bring forward ideas from our business and suppliers that support more sustainable products and building solutions.

Our [Sustainability Policy](#) confirms our commitments to sustainable practices across our business operations.

We have a [Supplier Code of Conduct](#), which requires all our suppliers to demonstrate transparency in the way they work, how they treat their people and suppliers, and their environmental protection measures they take.

This supports our [Human Rights Policy](#) includes our commitment to put processes in place to eliminate unethical practices and modern slavery in our operations and supply chains.

What this means for you

- Understand and meet environmental laws and regulations.
- Report any non-compliance with environmental laws and regulations to your EHS manager.
- Look for ways to save energy within your work environment, and pass on your ideas to your manager.
- Look for ways to use fewer materials in your role, and to reduce waste, and pass on your good ideas.
- Educate, support, and encourage suppliers and customers to be active in environmental protection and energy, waste, and water reduction.
- If you see or suspect signs of forced labor, child labor, withheld identity documents, or workers being held against their will, raise it immediately through your manager, Procurement, People and Performance, or FBuCall.



Engaging with our communities

We believe it's important to positively contribute to social issues where we can. As an organisation, we regularly engage with stakeholders and communities to understand their views, so we can respond appropriately to their interests. The communities we operate in matter to us, and to our social licence to operate.

We respect the needs and values of these communities, and where necessary, put additional measures in place to protect vulnerable members of the communities where we work.

Q+A

Q My child's sports team has made it to the National finals and needs to travel to Wellington. Can you help fund their trip?

A Fletcher Building business units sponsor a number of great teams, events and registered charities, based on their community needs, business strategy and the allocated budget for sponsorship. Generally these sponsorships are for local or community organisations rather than for individuals. However you are welcome to present opportunities to your manager or General Manager for review and do your own fund raising at your site.

What this means for you

- If Fletcher Building requires you to engage with communities, we expect that you will do so in a positive way.
- If you have ideas for how your business can engage with your community, please share them with your manager.
- We regularly support the communities where we operate with sponsorship and community investment.
- Any volunteer time, charitable donations, sponsorships, gifts or prizes or community investment to a community group or organisation must be pre-approved by your manager.



Management of crises

We must always be ready to respond to any type of crisis, emergency, or business interruption. Effective management of these situations is critical to ensure our people are protected, and damages or losses are minimised. Our Crisis Management Plan enables us to respond quickly and manage all risks appropriately.

What this means for you

- If an emergency arises immediately notify your manager.
- If you are a nominated member of the Crisis Management team, ensure you are always familiar with the Crisis Management Process and carry the Crisis Management Pack with you at all times.
- If you are responsible for managing the emergency:
 - Ensure the emergency is being managed as detailed in the Crisis Management Pack.
 - Formally assess the situation based on the severity.
 - Based on the severity assessment either activate the local Crisis Management Team or escalate to the Group Crisis Management Team.

Q+A

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Who should I contact if an incident occurs on my work site?

A

The Site/Plant Manager is the first person you should contact when an incident occurs.

Based on their severity assessment, they may activate the Site Crisis Management Team. The Site/Plant Manager is also required to notify their General Manager.

ACT WITH INTEGRITY AND HONESTY //



— Act with integrity
and honesty

Inclusion and Diversity

Inclusion will happen when our workforce feels respected for who they are and feel able to contribute their unique perspectives, ideas, and talents to the organisation. It means everyone can progress their careers and have equal opportunities.

Diversity is a mix of voices that reflects our community, and includes, but is not limited to, characteristics such as age, ethnicity, culture, gender, sexual orientation, disability, religious beliefs, skills, and education. It covers the way we come together for each individual, which shapes the way they view the organisation, and how others treat them.

We're committed to building an inclusive and diverse environment where everyone feels valued and comfortable being themselves and can fully contribute to the ongoing success of the business.

What this means for you

- We value your unique contribution and support your right to be treated fairly at all times
- We expect you to respect the rights of others and contribute to a workplace free from discrimination, harassment, bullying and intimidation.
- We encourage you to contribute positively to building a more inclusive and diverse workplace, seeking out and encouraging different perspectives and ways of working.
- Speak up if you see something inconsistent with our commitment to an inclusive and diverse working environment.



Bullying and harassment

We're all expected to behave in a manner that's consistent with our values. This enables us to provide a workplace that is free from bullying, discrimination, or harassment, regardless of its form.

All forms of bullying, discrimination or harassment are unacceptable in our workplace.

What this means for you

- Bullying and harassment will not be tolerated anywhere at Fletcher Building.
- Behave in a responsible and professional manner that's consistent with our values.
- Treat others with courtesy, respect, fairness, and honesty.
- Listen and respond appropriately to the views and concerns of others.
- Never behave in a way that is unwelcome, intimidating, or offensive, including threats, bullying, inappropriate jokes, or sexual harassment.
- Report and encourage others to report incidents of harassment and bullying.
- Managers must take all harassment and bullying complaints seriously and immediately address behaviour or conduct that may be offensive.

**FBuCall is an independent online and phone service you can contact to raise any concerns you have. Your complaint will be kept confidential and, if you choose to, anonymous. (See page 35)*

Q+A

Q

I've noticed one of my colleagues is always picked on by another team member. What should I do?

A

We should always challenge inappropriate behaviour. Contact your manager or People & Performance Team to discuss your concerns. If you feel uncomfortable doing this, then contact FBuCall.*

Q

My manager makes inappropriate sexual comments when we're alone. What should I do?

A

Harassment of any type is not tolerated. If you're comfortable, raise your concerns directly with your manager. If you're uncomfortable doing so, speak to your People and Performance Team. You can also report this behaviour via FBuCall.*

Conflict of interest

We all have an obligation to act in the best interests of the company at all times. Therefore, we all must avoid a conflict of interest between our personal interests and the interests of Fletcher Building.

A conflict of interest can happen if an employee's personal, social, financial, or political activities interfere, or could interfere, with their judgement in work-related decisions. If conflicts of interest arise, always disclose them immediately.

What this means for you

- Declare all actual or potential conflicts of interest.
- Once you have declared an actual or potential conflict of interest, you need to comply with instructions from your manager.
- Don't engage in activities that compete with, or appear to, compete with our company's interests.
- Never allow your business decisions to be influenced or appear to be influenced by personal or family interests or friendships.
- Only use company property, information, or resources for work purposes.
- Outside employment must not negatively affect your job performance or responsibilities and must be approved by your manager.
- Don't receive any personal benefit from a supplier, customer, competitor, or a company that does or seeks to do business with us.

Q+A

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How do I know if something is a conflict of interest?

A

Ask yourself these following questions:

- Do my outside interests influence, or appear to influence my ability to make sound business decisions?
- Do I stand to benefit from my involvement in this situation? Does a friend or relative of mine stand to benefit?
- Could my participation in this activity interfere with my ability to do my job?
- Is the situation causing me to put my own interests ahead of the business' interests?
- If the situation became public knowledge, would I be embarrassed? Could it harm the business' reputation?

Anti-bribery and corruption

We're committed to conducting business with honesty and integrity while maintaining our reputation for ethical practice. We take a zero-tolerance approach to bribery and corruption. New Zealand, Australian and South Pacific laws also prohibit bribery in every kind of commercial setting.

Facilitation payments, or kickbacks, are examples of bribery and are illegal. Giving or receiving gifts or entertainment could be considered bribery in certain circumstances. Be aware that even charitable donations can be seen as bribes if payments are made to facilitate a process or secure a commercial advantage.

What this means for you

- Never receive or accept a bribe.
- Be cautious when giving or receiving gifts or entertainment, (refer Gifts and Hospitality from Customers and Suppliers on the next page for more information). Ensure all gifts and entertainment are permitted by local law.
- Never make or offer to make a payment to a third party knowing the third party will use these funds to offer or make a bribe.
- Refuse to pay facilitation or other improper payments.

Q+A

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What is a facilitation payment?

A

A facilitation is a payment made to a public official to speed up a service to which the payer is already entitled. An example is a payment to an official to speed up the issue of a permit or work visa. Another example might be a payment to an official to accelerate the clearance of goods through customs.

Q

A health and safety inspector arrives at our plant. As an act of goodwill, can I give them some Fletcher Building branded merchandise.

A

Never give anything of value to a government official without prior approval from the legal team. Giving anything of value (even small gifts, meals, or other gratuities) could be perceived as a bribe intended to influence the inspector's review of the facility.

Receiving gifts and hospitality

It's important to think carefully before providing gifts or hospitality. When providing gifts or hospitality, there are guidelines and limits to follow to ensure we do this fairly, consistently and avoid any negative perceptions.

For example, if you're securing a new supplier or tendering for work, accepting any gifts or hospitality might be perceived as preferential treatment or providing an unfair advantage. Even if it's an innocent gesture, it could be perceived negatively or be seen as influencing a decision.

What this means for you

- Never ask for or suggest gifts or hospitality.
- Money, loans, or holidays cannot be accepted under any circumstances.
- All Christmas gifts will be distributed to employees on a fair basis.
- Gifts under \$50 or hospitality valued at less than \$250 are generally okay to accept with your manager's approval.
- Anything over those values must be approved by your manager's manager. They must also be logged in our Probity Register to ensure there is a record.

Q+A

Q

A supplier to Fletcher Building has offered me tickets to a sporting event. Can I accept them?

A

Yes, provided there are no open commercial discussions underway with that supplier. If the ticket is offered for you to enjoy on your own, it's a gift and if the value is more than \$50 you must get pre-approval from your manager. If the ticket is offered in conjunction with a supplier event, then it's hospitality and if the value is more than \$250 you must get pre-approval from your manager.

Q

During the course of negotiations with a potential supplier, I've been invited to join the owner of the company on a fishing charter. Can I go?

A

No, there's a risk this could influence the negotiations, or could give the impression it will do so (to both the supplier and/or other people).

Providing gifts and hospitality

There are guidelines in place to ensure that gifts and hospitality, both internally and externally, are managed carefully to avoid negative perceptions.

What this means for you

- When providing hospitality to employees, suppliers or customers, spending limits and guests must be approved by your manager in advance.
- The most senior person present at any function must pay, and the cost must not be spread over multiple credit cards. A record of who attended, including GST receipts, must be provided when submitting an expense claim.
- Never make donations, loans or provide any kind of benefit to political parties or candidates on our behalf
- Any charitable donations, sponsorship or prizes must be approved by your business unit manager.
- Employee gifts for a birth, adoption, wedding, or retirement are limited to a maximum of \$150 and must be pre-approved by your manager.
- Gifts for a bereavement or hospitalisation are limited to a maximum of \$80 and must be pre-approved by your manager.
- Modest contributions for an employee's farewell must be pre-approved by your manager.
- Ensure you adhere to all relevant policies relating to providing gifts and hospitality.

Q+A

Q

A member of my team is leaving after many years of service. Can I arrange a morning tea and leaving gift for them?

A

Yes, but discretion needs to be applied to the amount spent on a morning tea and the value of the gift should not exceed the company limits. You should seek approval from your manager on costs.

Q

A local sports team have asked us to sponsor them, and in return will place our logo on their shirts. Can I agree to this?

A

We do agree to certain sponsorship opportunities on a case-by-case basis. All requests should be referred to the business unit's General Manager, who has the authority to approve them.

Using a corporate credit card

Having a corporate credit card is a privilege and allows for efficient expense management for our people. It also comes with a responsibility to adhere to our internal policies that govern corporate spending.

What this means for you

- Never use your company credit card for personal expenses or withdraw cash from it.
- Always keep your company credit card secure and do not share the PIN. If you lose it, notify ANZ as soon as possible.
- All company credit card spending must be submitted with valid tax invoices / receipts in the Workday Expense Management system.
- Expenses must be processed by the 7th day of the month. Please note that if expenses are not submitted within 60 days, the card will be put on hold and cancelled after 90 days.

Q+A

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If I am temporarily short of cash, can I use my company credit card to pay for personal items and then quickly pay the company back?

A

No. You must never use a company credit card to pay for personal items. All other company funds (e.g. company payments to suppliers) must also never be used for personal items.



Travelling for work

It's important both managers and the person travelling take responsibility to ensure the health, safety, and wellbeing of the person travelling. It's also important travellers take advantage of the numerous agreements we have in place with travel providers that provide safe and cost-efficient options.

What this means for you

- All travel must be authorised and pre-approved by your manager.
- Depending on the travel time, air travel needs the approval of your manager or your managers' manager. Flights to high-risk destinations require the approval of an Executive Team member.
- All travel such as flights and accommodation should be booked via our approved travel provider through your BU. Never book your own business travel.
- Only claim business expenses that are necessary and reasonable for your business travel and are included in the list of acceptable travel expenses as outlined in our Travel and Entertainment Policy. Use your company credit card for travel-related expenses whenever possible.

Q+A

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I travel regularly for work. Can I access airline lounges when I'm travelling?

A

Some employees do have access to airline lounges depending on the frequency of their travel. Speak to your manager to see whether you are eligible for this.

Q

I'm travelling overseas for business and would like to add on some annual leave at my cost. Is this allowed?

A

Managers decide such requests on a case-by-case basis. Speak to your manager and ensure leave is pre-approved.



Protecting our assets



Protecting company resources

We rely on our people to use company resources honestly and efficiently. Resources include physical property, such as facilities and supplies, as well as intangible assets such as company time and confidential information.

Company resources should only be used for legitimate business purposes and should be protected from theft, loss, damage, or misuse. Using the company's equipment or space for personal use is prohibited. If you see company resources being misused, speak up and report it. You can do so anonymously via FBUCall.

The obligation to protect company funds is particularly important if you have spending authority, approve travel and entertainment expenses, or manage budgets and accounts.

You must always:

- Ensure Fletcher Building funds are properly used for their intended purpose.
- Obtain the necessary approvals before incurring an expense.
- Accurately record all expenditures.
- Verify that expenses submitted for reimbursement are business-related, properly documented and comply with our policies.
- Protect the company from phishing attacks. Always forward any unsolicited (spam/junk) email to spam@fbu.com and then delete the email.
- If you receive unusual payment or bank instructions always check on the authenticity before taking any action.

Q+A

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What are some examples of dishonest use of company resources?

A

Taking product or supplies for personal use, charging personal expenses on company credit cards, using company vehicles for unauthorised personal transportation needs, reselling scrap, or waste products for your financial gain, or diverting assets through fraud are all examples of theft of company resources.

Q

I suspect a business transaction I have some knowledge of has been incorrectly recorded. What should I do?

A

Immediately report this to your Business Unit Commercial Manager or Finance team.

Committing to contracts and spending money

We expect our people to use good judgement when spending company money or committing to contracts. We have defined processes for interacting with suppliers, negotiating supply contracts, and making purchasing decisions. Legally binding contracts with agreed terms and conditions are required before we can commit our resources.

We also expect all suppliers to adhere to Fletcher Building's [Supplier Code of Conduct](#). Please ensure you share this with suppliers prior to starting any new contracts.

The Delegated Financial Authorities (DFA) confirm the level of authority you need before committing us to a contract or expense.

What this means for you

- Only commit to a contract or incur expenses where you are authorised to do so, and within your delegated financial authority.
- If you do not have sufficient delegated authority any commitment must be pre-approved by someone with the sufficient delegated financial authority.
- Legally binding contracts, which protect Fletcher Building from legal, commercial, and reputational risk are required before company funds can be committed.
- Suitable steps must be taken when selecting suppliers to assess them for socially responsible behaviour and sustainable practices. Socially responsible behaviour is highlighted in our [Supplier Code of Conduct](#), it includes behaviours such as respecting human rights, avoiding bribery and corruption, and having a healthy workplace.

Q+A

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How do I know what authority I have to spend money on behalf of Fletcher Building?

A

Check with your manager or ask someone in your Business Unit Finance Team.

Q

Why should I involve the procurement organisation in the selection of suppliers?

A

Procurement ensures where possible that we use preferred suppliers. They also ensure we agree to supply contracts that comply with [our Standard Terms and Conditions for Supplier Agreements](#). Procurement will take suitable steps to assess new suppliers for socially responsible behaviour and environmentally sustainable practices, as well as ensuring competitive price and service offers.

Provide accurate and complete financial information

Honest, complete, and accurate information is critical to protecting our credibility, reputation and meeting our legal obligations. We're committed to ensuring our business records, including our financial statements, contracts and agreements are complete, and accurately reflect transactions and events. They should never be falsified for any reason.

We implement a system of internal control processes to protect the integrity of our financial records and we ensure our financial statements are reviewed by independent auditors.

What this means for you

- All your transactions, no matter what the dollar amount, must be properly authorised, executed and recorded.
- You are accountable for the accuracy of the business records that you handle.
- You must not falsify, omit, misstate, alter, or conceal any information or otherwise misrepresent the facts on a company record.
- If you notice an inaccuracy in a company record, or a failure to follow our internal control processes, you must promptly speak up and report it.



Protecting company information

While working for us, you'll gain a lot of information about our business and you may have access to confidential information. You should assume any company information is confidential unless it's been publicly disclosed.

Our company information and intellectual property are valuable assets and we need to ensure we keep it safe. Disclosing company information to the wrong people could cause reputational damage to us. We also have a responsibility to protect any information we hold on our customers, suppliers and business partners and ensure it's only used for its intended purpose.

What this means for you

- Never disclose Fletcher Building information without validating the identity of the requester. Ensure you are authorised to disclose the information.
- Protect confidential information by operating a clear desk policy. Lock away confidential print outs, and shred unwanted printouts or dispose of it in the secure document bins.
- Ensure all electronic information is stored securely.
- Always select strong, secure passwords (a mix of alpha and numeric minimum eight characters). Never share or write down your passwords.
- Ensure you lock your PC when you leave your desk and power down your laptop when you're done using it.
- Never leave laptops or company documents unattended. Secure them or keep them with you.
- Always delete any unsolicited (spam/junk) email from unknown recipients. Never open non business-related attachments and don't distribute non business-related email.

Q+A

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What business information is considered confidential?

A

Confidential information includes information that if disclosed could be harmful to us, our shareholders, suppliers, employer, customers, or other third parties in business with us.

It also includes information that is material to a reasonable investor's decision to buy or sell Fletcher Building shares or shares of our business partners.

Examples include, earnings, forecasts, business plans, significant restructurings, potential acquisitions, and information regarding Fletcher Building securities.

Using our digital systems

We continually invest in our digital systems to provide our people with access to a range of tools and resources. Matrix (our intranet), Outlook, MS Teams, our telephone, and Wi-Fi system enable us to interact and collaborate.

There's an expectation you'll use these resources appropriately and protect the valuable information these resources allow you access and share.

What this means for you

Appropriate use

- Arranging business meetings with internal and external parties.
- The personal use of email is permitted if kept to a minimum.
- Sharing Fletcher Building information with external third parties and customers where and when it's relevant and appropriate in order to conduct business.

Inappropriate use

- Sharing, storing, or receiving information that may conflict with our interests and policies or have the potential to bring the business into disrepute.
- Sending or forwarding emails, scams, spam, or malicious software.
- Storing or sharing information that is offensive and abusive.
- Broadcasting information to large numbers of employees without prior approval and/or without the proper authority to do so.
- Forwarding or creating Fletcher Building documents with personal accounts such as Gmail or Facebook if you're not authorised to do so.
- Using your work email as a login credential for any external, private, or non-work-related platforms and applications.

Q+A

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Am I allowed to check my personal email at work from my work computer, for example Gmail?

A

You can check your personal emails as long as it doesn't interfere with your job. When using your personal email account avoid opening attachments as the risk of a virus or malware is much higher in public email systems. Also never use these personal accounts to send or create work documents.

Speaking on behalf of Fletcher Building

As a company we need to be careful about what we say publicly. To limit any risk to our business we have specific rules in place to ensure publicly released information is appropriately disclosed and accurately reflects our position. This means only a few people are authorised to speak to the media or public on behalf of the company. These rules are in place to reduce risk and protect you and our reputation.

The people with permission to speak or make statements for, or on behalf, of the business are as follows; our Chair, the CEO, the Exec, and Chief Corporate Affairs Officer.

What this means for you

- Unless express permission is given by the Chief Corporate Affairs Officer or a member of the Executive team you cannot speak on behalf of Fletcher Building
- If you are contacted by the media, investors/ analysts or anyone asking to share company information, politely advise them to contact the [Corporate Affairs](#) team who will respond to their request.
- If you accidentally disclose confidential information, let the Corporate Affairs team know as soon as possible so they can manage the situation.



Use of social media

Fletcher Building has official social media pages on Facebook and LinkedIn. We use these channels to engage with our communities, our customers, and the general public because it's a great way to get our message out and build our brand. These channels are managed by our people who have permission to post on behalf of Fletcher Building.

Additionally, you should also be aware that your personal social media activity can inadvertently be associated with us because you work here. Because of this, you need to be conscious that whatever you post online may have unintended consequences for us as a business, and you as an employee.

What this means for you

Personal social media activity

- Before you share anything on social media that could be linked to us, carefully consider if it could negatively impact our reputation. If in doubt, don't do it. It's better to be safe than sorry.
- Never share any commercially sensitive or confidential information about us, our people, our customers, or any other business partners online.
- Don't use any Fletcher Building branded material or images without gaining approval from Corporate Affairs first, you can contact the team on fb-communication@fbu.com.
- When using your personal social media accounts, you should always be aware that you do not, and cannot, speak on behalf of Fletcher Building. This is important because the public will take what you say on face value and may mistake your statement for an official company line.

Fletcher Building social media accounts

- You must have authorisation before you set up a social media account or page on behalf of any Fletcher Building Business, and before you post anything on behalf of Fletcher Building. To have this discussion please get in touch with Corporate Affairs on fb-communication@fbu.com.
- If your business has an approved social media page make sure your posts are factually correct, not misleading and it's in line with our internal policies and any legal obligations such as privacy, libel, and copyright.
- Please don't respond to any negative comments made by others on our Fletcher Building social media accounts.
If you're concerned, contact Corporate Affairs who will determine the best way to deal with it.





Winstone Wallboards

— Complying
with the law

Competing fairly

As a market leader, we're committed to adhering to rigorous trade practices in every jurisdiction we do business with. We'll continue to compete aggressively in all markets but are committed to playing fairly.

We'll never engage in anti-competitive, false, or misleading conduct, or dishonourable business practices.

What this means for you

- If your role requires an awareness of trade practices law, you must participate in face-to-face compliance training every two years.
- Don't enter into any communication, contracts, or arrangements, which could substantially lessen competition or may be construed as anti-competitive, such as setting prices or bid rigging.
- Don't provide confidential or commercially sensitive information to competitors, including pricing, costs, or tenders.
- Don't obtain price information or other benchmarking information from competitors or from co-workers about previous employers.
- Always obtain competitive information from publicly available sources.
- If you're attending trade association meetings or have some involvement in trade associations, you must obtain pre-approval from your divisional Chief Executive before doing so.
- If you suspect any violation of competition laws, report it to our Legal team or report it anonymously via FBuCall. (See page 35)

Q+A

Q

I am attending an industry association meeting next month and many of our competitors will also be attending. Can I ask these competitors about any new products or new pricing initiatives?

A

No, avoid any discussions on commercially sensitive matters as this may be viewed or perceived as an attempt to eliminate fair and open competition. Before attending an industry association meeting, obtain approval from your divisional Chief Executive.

Continuous disclosure

We're committed to the promotion of investor confidence by ensuring all dealings take place in an efficient, competitive, and informed market. We commit to the timely disclosure of all material information, so our shareholders have accurate, relevant, and fair access to information in order to make informed decisions.

We have a Disclosure Committee to ensure processes are in place to identify potential material information and to determine when, and if, it should be disclosed to the market.

What this means for you

- If you become aware of an issue that could be considered material market information, disclose it immediately to an Executive member or our Legal Team.
- Don't communicate any material information to anyone until it has been made public.

Insider Trading

What this means for you

- You must protect all material non-public information from disclosure.
- If you possess material non-public information you must not:
 - Trade in the securities of Fletcher Building or any other publicly traded company.
 - Encourage others to trade or hold any of these securities.
 - Pass on the information to anyone outside our company, including family members and friends.

Q+A

Q

What is material information?

A

Material information means any information a reasonable person would expect could influence the share price such as updated earnings guidance.

Q

What information is considered "material non-public information"?

A

Any information that has not been disclosed to the public, which if made available to the market, could have a material effect on our share price.

Keeping personal information safe

Personal information is any information that is about any individual – our employees, customers, and business partners. We know how important it is to keep this personal information safe and manage it carefully and respectfully. For this reason, we have high standards for the protection of personal information.

Fletcher Building has adopted a Privacy Management Framework that is overseen by our Privacy Officer and ensures our compliance with Privacy Laws.

We'll respect people's legal rights to privacy and the confidentiality of personal information, only collecting and retaining personal information that we need to operate effectively or to comply with the law.

What this means for you

- Classify personal information as confidential and ensure it's stored in a manner that does not allow for unauthorised access.
- Use information only for the purpose it was collected for.
- Ensure personal information is only shared with authorised people who have a clear business need for that information.
- Keep personal information only for as long as necessary to achieve the legitimate purpose it was collected for.
- Report any breach or suspected or potential breach of our privacy obligations to the Privacy Officer.



Consequences of breaches of Code of Conduct

Our Code of Conduct represents our joint commitment to follow the FB Way and do the right thing – to be honest and fair. We recognise we're all accountable for how we work and respond. As a Fletcher Building employee, you agree to uphold this commitment.

We're committed to fostering an environment where everyone is treated fairly. We encourage an environment where we can learn from our experiences and support our people to make the right choices about their behaviour.

Where a breach of the Code of Conduct occurs, we'll take a holistic view of the circumstances when determining an appropriate response, which may include coaching, training, system change or disciplinary action.

While we recognise genuine errors and mistakes happen, we won't tolerate negligence, reckless or wilful breaches of the Code of Conduct. These behaviours may undermine the relationship of trust and confidence, and as such they will be investigated, and a disciplinary process may commence.

For employees, disciplinary processes may result in a number of outcomes, such as formal warnings and/or dismissal depending on the circumstance and the seriousness.

In the event a contractor, or temporary worker breaches the code of conduct, we will consider whether the engagement can continue, this will depend on the nature and seriousness of the breach.

Procedural fairness

In all formal disciplinary investigations and processes, we'll act fairly, reasonably, and promptly. This will include meeting with you, offering you an opportunity to bring a support person or representative to any disciplinary meetings and giving you an opportunity to respond to the allegations.

Suspension

Where we consider it necessary, we may decide to suspend you while we investigate your conduct or your performance. Where any suspension extends beyond our control (e.g. police investigation) the suspension may continue without pay.





Speak up

We take our commitment to do the right thing seriously. Unacceptable behaviour should not be ignored, and all Fletcher Building people are encouraged to speak up when something is not right. We'll protect anyone who speaks up from reprisal or repercussions, provided the disclosures are reasonable and without malicious content.

Speak up if:

- You see a dangerous behaviour or practice could risk the health and safety of any Fletcher Building people, suppliers or contractors.
- You suspect unethical or illegal activity.
- You see behaviours that do not meet our company values or policies such as bullying and harassment
- You see behaviours that puts our people, assets, or reputation at risk.

There are three ways to speak up

Talk first to your manager

We understand it may be difficult to raise your concerns, but we do value open and honest conversations and encourage you to discuss any potential issues with your manager.

Talk to your P+P team

If you are not comfortable talking with your supervisor or manager, discuss the issue with your Business Unit People & Performance team.

Contact FBUCall

FBUCall is a service that can be accessed via phone or online. FBUCall is monitored 24 hours a day by experienced professionals. It's operated independently to ensure that, if you prefer, your call is kept anonymous.

Phone: 0800 576 400 (NZ) OR 1800 870 585 (AUS)

Online: fletcherbuilding.com/fbucall

