

## Introduction and purpose

To achieve OfficeMax’s vision of empowering successful, sustainable workplaces, we recognise the importance of supporting responsible procurement practices at all stages of our value chain.

Being responsible is about seeking to make a positive impact on people, the environment, society and the economy.

This supports OfficeMax’s Sustainability Policy and 2025 sustainability strategy, which has three key aspirations supported by six goals:

<p><b><u>FOSTER A SAFE, HEALTHY AND INCLUSIVE SOCIETY</u></b></p> <ul style="list-style-type: none"> <li>• Support health, safety and resilience</li> <li>• Promote inclusivity and equal opportunity</li> </ul>	<p><b><u>PROVIDE SOLUTIONS FOR A RAPIDLY CHANGING WORLD</u></b></p> <ul style="list-style-type: none"> <li>• Provide flexible product and service solutions</li> <li>• Empower the future of work</li> </ul>	<p><b><u>DRIVE A LOW CARBON CIRCULAR ECONOMY</u></b></p> <ul style="list-style-type: none"> <li>• Improve the environment through our value chain</li> <li>• Support local solutions</li> </ul>
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These aspirations and goals guide our Responsible Supplier Code (RSC), recognising it is our collective effort that will help us to achieve these outcomes meaningfully.

We understand everyone is at different stages on their sustainability journey, which is why we have developed criteria to take into account the diversity of our suppliers and their sustainability maturity: All suppliers are required to meet our Standard requirements and we will evaluate, notify and support suppliers that are expected to also meet either Standard PLUS and / or Advanced requirements.

We may contract specific performance measures with like-minded suppliers to work on projects that are directly aligned with our core sustainability goals. Suppliers will comply with any additional requirements specific to the products or services being provided to OfficeMax as required in contract documents.

The purpose of this RSC is to provide clear guidance to all our Suppliers seeking to meet the Standard, as well as the Standard PLUS and / or Advanced standards for doing business with OfficeMax.

<b>Standard:</b>	These are our minimum expectations that must be met at all times when doing business with OfficeMax. These requirements uphold the applicable national or international laws or regulations.
<b>Standard PLUS:</b>	These are our expectations for suppliers of OfficeMax-branded product and other key suppliers as determined by OfficeMax. These Suppliers undertake a more rigorous audit process and in addition to this RSC, adhere to our Social Compliance and Ethical Sourcing Policy.
<b>Advanced:</b>	These requirements support good sustainable practices and OfficeMax’s own sustainability goals. We encourage all suppliers to aspire towards the Intermediate requirements as they advance on their sustainability journey.

## Scope

The RSC applies to all OfficeMax Suppliers. This includes any company or organisation that provides goods and/or services to OfficeMax New Zealand Limited (OfficeMax), and any sub-contractors. For the purpose of this document, the term Supplier applies to suppliers, service providers and other subcontracting parties.

## Implementation

Suppliers must effectively communicate the content of this RSC to their employees and subcontractors, parent and subsidiary companies and affiliates providing products or services to OfficeMax and undertake actions necessary and appropriate to ensure its implementation.

OfficeMax will conduct regular internal assessments to ensure compliance with this RSC and may request documentation which demonstrates compliance.

All Suppliers are expected to adhere to this RSC and report any non-compliance to OfficeMax's Hotline via the local number (0800 946 201) or on the web at [officemax.co.nz/hotline](http://officemax.co.nz/hotline). All reports are kept confidential and callers may choose to remain anonymous in their reporting.

If the supplier fails to comply with the RSC, OfficeMax may take action against the supplier, including suspending or terminating the supplier agreement.

# 1. Foster a safe, healthy and inclusive society

## 1.1 Health, safety and wellbeing

### Standard

- ✓ 1.1.1 Health and safety obligations, including all applicable laws, regulations and standards in New Zealand and other countries where the Supplier is doing business, are complied with.
- ✓ 1.1.2 Workers are protected from severe occupational health and safety hazards arising from their work.
- ✓ 1.1.3 Equipment is safe and used under safe conditions.
- ✓ 1.1.4 Workers use personal protective equipment and protective clothing, which is clean, free of charge, in working order and appropriate for the risks identified.
- ✓ 1.1.5 Accidents and near-miss events related to occupational health and safety are reported, analysed, followed up and acted upon. Records of accidents and near-miss events are retained.
- ✓ 1.1.6 Safety hazards are continuously reported, analysed, followed up and acted upon.
- ✓ 1.1.7 Accident insurance is provided to all workers as per the local government regulations. Insurance covers medical treatment for work-related injuries and illnesses and provides compensation for work-related injuries and illnesses resulting in permanent disability or death.
- ✓ 1.1.8 Any staff of Suppliers and their subcontractors entering OfficeMax premises or OfficeMax's customer premises on behalf of OfficeMax may be required to hold a valid My Vaccine Pass (applicable to all New Zealand-based businesses)
- ✓ 1.1.9 Where applicable, a working and housing environment is provided that is sanitary, safe, healthy and compliant with applicable laws and regulations relating to working and living conditions.

## Standard PLUS

- 1.1.10 An operational risk management framework is in place to ensure that workers, the public and environment are not harmed through business operations.

## Advanced

- 1.1.11 Occupational health, safety and wellness risks, including those related to mental health and ergonomics, are assessed and actions are taken to mitigate them.
- 1.1.12 Workers build their capability to manage risk, through participation in an employee safety and wellbeing management programme.

## 1.2 Labour standards, Human Rights and Modern Slavery

### Standard

- 1.2.1 There is no form of forced labour, including prison, indentured, bonded, military, slavery, or any other form of forced labour.
- 1.2.2 There is no participation in the recruitment, transportation, transfer, harbouring or receipt of any persons by means of threat, use of force, or any other forms of coercion, abduction, fraud, deception, abuse of power or position of vulnerability, or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person for the purpose of exploitation.
- 1.2.3 There is no requirement for workers to remain in employment against their will.
- 1.2.4 There is no child labour. Workers must not be younger than the minimum employment age established by the respective country or local jurisdiction.
- 1.2.5 Employee working hours, including voluntary overtime work, and the granting of leave of any form, are in accordance with applicable local and/or national laws. Workers shall not work more hours in one week than permissible under local laws. Overtime is to be voluntary, compensated at a legal rate and must be provided under safe and healthy work conditions.
- 1.2.6 Suppliers respect the rights of workers to freely associate, organise and bargain collectively in accordance with the employment laws of their local country. OfficeMax encourages communication and direct involvement of Suppliers' management and workers regarding working conditions without fear of intimidation, harassment or reprisal.
- 1.2.7 All workers of Suppliers receive at least the legal minimum wage and benefits. A written account of wages is given to the worker during each pay period clearly indicating the worker's compensation and any deductions. Suppliers do not deduct penalties from worker wages for disciplinary infractions.

### Advanced

- 1.2.8 The Supplier is a Living Wage employer, meaning it provides a proper and competitive wage, which meets the basic needs of employees, provides them with discretionary income, and is equal to or above local living wage standards.

## 1.3 Diversity, inclusion and equal opportunity

### Standard

- ✓ 1.3.1 All workers are treated with respect and dignity.
- ✓ 1.3.2 Suppliers make hiring decisions on the basis of the worker's qualifications to perform the specific job. Suppliers avoid making any decisions relating to hiring, salary, benefits, advancement, discipline, termination or advancement on the basis of the employee or potential employee's race, colour, gender, nationality, religion, age, maternity, sexual orientation or marital status.
- ✓ 1.3.3 Workers shall not be subject to verbal, physical, sexual or psychological abuse, or any other form of mental or physical coercion. No physical violence or punishment is used as a form of discipline.

### Advanced

- 1.3.4 The Supplier maintains a workforce that broadly reflects the communities in which the Supplier operates.
- 1.3.5 Action is taken to address gender pay gaps and gender balance.
- 1.3.6 The Supplier demonstrates support for New Zealand businesses and New Zealand made products whenever possible.
- 1.3.7 OfficeMax supports increasing the diversity of our supplier base to achieve broader economic and social outcomes. Suppliers support opportunities for New Zealand Business including Māori, Pasifika, and regional businesses, as well as social enterprises.

## 1.4 Emergency management and business resilience

### Standard

- ✓ 1.4.1 All applicable laws and regulations pertaining to the local fire code standards are adhered to and emergency equipment (i.e. alarms, extinguishers) is properly maintained.
- ✓ 1.4.2 A full fire system is installed on the premises and serviced on a regular basis to meet all fire code regulations.
- ✓ 1.4.3 A suitable number of workers must be trained in first aid and as fire wardens to cover all operating hours. Fire extinguishers are available during operating hours with sufficient capacity to cover fire suppression to mitigate risk.
- ✓ 1.4.4 Evacuation drills are performed to test the evacuation procedures and identify any need for improvement.

### Standard PLUS

- 1.4.5 Risks of emergency situations are assessed, including (but not limited to) natural disasters, pandemic, fire, earthquake, and terrorism. Written emergency routines are implemented.

### Advanced

- 1.4.6 Risks relating to climate change, in particular those with a potential to disrupt supply, have been assessed, prioritised and adaptation plans developed.

## 1.5 Security

### Standard

- ✓ 1.5.1 A sound plan to enhance security procedures in compliance with the Security Requirements (see below) is developed.

## 2. Provide solutions for a rapidly changing world

### 2.1 Worker development

#### Standard

- ✓ 2.1.1 Workers receive training and capability development that allows them to fulfil their tasks.
- ✓ 2.1.2 Workers receive compensation for on-the-job training.

#### Advanced

- 2.1.3 Workers have the opportunity to develop their capability in areas related and unrelated to their current area of work.

### 2.2 Ethical business

#### Standard

- ✓ 2.2.1 All products and services supplied have been or shall be developed, produced, packaged, labelled, shipped and documented in compliance with all applicable laws of the respective country in which the goods and services are developed, produced, packaged and shipped, and all other applicable federal, state and local laws, regulations and administrative rules or orders, including, but not limited, to those involving or enforced by Customs and Border Protection.
- ✓ 2.2.2 Suppliers comply with all laws, rules and regulations that are applicable to its relationship with OfficeMax, including, but not limited to, New Zealand laws regulating prohibition of bribery, anti-terrorism, asset controls and corruption, as well as applicable import and export laws, regulations and administrative rules or orders.
- ✓ 2.2.3 Suppliers shall notify OfficeMax in advance of any conflicts of interest, which may affect the Supplier's ability to meet compliance requirements. This includes any relationships with foreign officials or a non-New Zealand government agency.
- ✓ 2.2.4 Suppliers shall notify OfficeMax immediately in the event of circumstances or changes that would or may affect the Supplier's ability to remain compliant with OfficeMax's compliance standards.
- ✓ 2.2.5 Suppliers avoid actions that may result in conflicts of interest, which include offering or providing personal gifts, favours, personal travel expenses, lodging, or other housing services of any kind, excessive meals and entertainment, or any other thing of value to OfficeMax associates.
- ✓ 2.2.6 No form of corrupt practice occurs, including, without limitation, extortion, fraud, impersonation, false declarations or bribery. Bribes, implied or offered, with the intention of obtaining or retaining a business or other improper advantage are not to be offered or accepted.

- ✓ 2.2.7 Suppliers comply with the following OfficeMax policies regarding gifts and hospitality to help alleviate any perception of impropriety:
  - ✓ • Suppliers shall not offer OfficeMax associates gifts of more than NZ\$75 in value and OfficeMax associates may not accept such gifts. There are no exceptions.
  - ✓ • Suppliers shall not offer OfficeMax associates items for purchase directly from the Supplier at a preferential price lower than the price offered to the public.
  - ✓ • Suppliers must immediately report to OfficeMax any inappropriate requests or solicitations made by OfficeMax associates. Suppliers may do so by reporting to at officemax.co.nz/hotline.
  - ✓ • Suppliers must keep a written account of all payments (including meals, entertainment, gifts or items of value) made on behalf of OfficeMax.

## 2.3 Subcontracting

### Standard

- ✓ 2.3.1 Subcontracted production or processing is disclosed to OfficeMax.
- ✓ 2.3.2 Suppliers have adequate policies and procedures in place for properly managing subcontracting to ensure that subcontractors operate in accordance with applicable laws and regulations.

## 2.4 Conflict minerals – Apply to Product Supplier Only

### Standard

- ✓ 2.4.1 Products supplied for OfficeMax's private brand products are Democratic Republic of Congo (DRC) conflict free.
- ✓ 2.4.2 Appropriate policies, due diligence frameworks and management systems consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas can be provided upon the request of OfficeMax. Where these cannot be provided, OfficeMax may demand corrective action or terminate its business relationship with the Supplier.

# 3. Drive a low carbon circular economy

## 3.1 Environmental impacts and emissions

### Standard

- ✓ 3.1.1 All applicable environmental laws, regulations and standards in New Zealand and other countries where the Supplier is doing business are complied with.
- ✓ 3.1.2 Environmental risks and impacts are identified and monitored and sufficient controls are in place to minimise all environmental hazards, waste or pollutants unique to the Supplier.

## Advanced

- 3.1.3 Energy sources – whether purchased or generated – have been identified and renewable energy options explored.
- 3.1.4 Greenhouse gas emissions are being measured and reported.
- 3.1.5 A greenhouse gas inventory verified to a recognised international standard such as the Greenhouse Gas Protocol or the current ISO 14064 is provided annually.
- 3.1.6 A greenhouse gas emissions science based reduction target has been set, aligned with limiting global warming to well below 2 degrees Celsius and aiming towards 1.5 degrees Celsius above pre-industrial temperatures.

## 3.2 Environmental credentials of products and services

### Standard

- 3.2.1 The origin of all product primary materials and components can be traced and disclosed to OfficeMax upon request.
- 3.2.2 Any environmental certifications or evidence of an environmental claim relating to products or services must be disclosed to OfficeMax upon request.
- 3.2.3 Suppliers must disclose each component and product weight upon request.

### Advanced

- 3.2.4 Products and services supplied have certified environmental credentials that can be proven to be legitimate and evidence provided on request.
- 3.2.5 Timber or timber fibre based products will hold an appropriate sustainable forest management certification such as FSC or PEFC.
- 3.2.6 Products are designed and manufactured to be durable, reusable, repairable or re-manufacturable with options to recycle at end of life.

## 3.3 Packaging

### Standard

- 3.3.1 Packaging of products aligns with OfficeMax's Product Packaging Guidelines.
- 3.3.2 The quantity, volume, weight and type of packaging materials on products must be disclosed to OfficeMax upon request.

### Standard PLUS

- 3.3.3 100% of all Product packaging is Reusable, Recyclable or Compostable in New Zealand by 2025.

### Advanced

- 3.3.4 Packaging materials include recycled content.
- 3.3.5 Packaging materials are part of a return system, or are reusable/re-purposable in their current form within New Zealand.

### 3.4 Waste management and product stewardship

#### Standard

- 3.4.1 Waste is stored, handled, transported and disposed of in a way that protects the health and safety of workers and the environment. Hazardous and non-hazardous waste are kept separate.
- 3.4.2 Waste is not incinerated on site, unless for the purpose of recovering energy.
- 3.4.3 The quantity/volume/weight and type of waste materials must be disclosed to OfficeMax upon request.
- 3.4.4 Opportunities to reduce, reuse and recycle waste are identified and implemented.

#### Advanced

- 3.4.5 Opportunities for product stewardship have been developed in conjunction with OfficeMax.

### 3.5 Freight products and services

#### Standard

- 3.5.1 Where applicable, Suppliers will work with OfficeMax to determine the most efficient freight route when shipping products or services to or within New Zealand.

## Supplier Attestation

The Supplier authorises the procurement of an investigative background search in accordance with anti-terrorism legislation. The Supplier also certifies that neither it, nor any of its funding sources, is or has ever been a terrorist or suspected terrorist, or a person or entity described in the aforementioned legislation. The Supplier understands that OfficeMax will not do business with a Supplier if the Supplier has ever been a suspected terrorist or associated in any way with terrorist activities.

The Supplier also agrees to provide accurate and complete information to OfficeMax to enable it to comply with all of its importation requirements. By way of signature below, the Supplier certifies that it has read, understood and agreed to the terms and conditions set forth in the RSC and agrees to promptly report any confirmed or suspected non-compliance matters relating to these principles to OfficeMax. The Supplier further certifies that materials incorporated into the products it supplies to OfficeMax comply with the laws regarding slavery and human trafficking of the country or countries in which it is doing business.

OfficeMax will indicate below when a supplier is required to meet Standard Plus and/or Advanced conditions:

Standard       Standard PLUS       Advanced

Supplier Name: \_\_\_\_\_  
(Full Legal Name of Company)

Signature: \_\_\_\_\_

Name: \_\_\_\_\_  
(Authorized representative of the company)

Title: \_\_\_\_\_ Date: \_\_\_\_\_



# Security Requirements

Every Supplier should have a written security procedure in place to protect OfficeMax's intellectual property and confidential material, as well as those associates that work at or visit such Supplier facilities.

## Information security

Suppliers must ensure appropriate controls are in place to protect OfficeMax's brand and intellectual property against unauthorised use and damage. Any information used in the business relationship with OfficeMax that is non-public and proprietary must be protected against loss and infringement. Any disclosure or use of such information must only be for the purposes authorised by the contractual agreement. In case of sub-contracting, sharing of confidential information must only be made with the prior consent of OfficeMax. Suppliers must seek OfficeMax's consent prior to disclosing personal information to foreign entities.

## Physical Security

All buildings should be constructed with materials which resist unlawful entry and protect against outside intrusion.

Physical security should include:

- Adequate locking devices for external and internal doors, windows, gates and fences.
- Segregation and marking of international, domestic, high-value and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area.
- Adequate lighting both inside and outside the facility, as well as in parking areas.
- Parking area for private vehicles that is separate from the shipping, loading dock and cargo areas.
- Having internal/external communications systems in place to permit prompt contact of internal security personnel or local law enforcement/police.

## Access Controls

Unauthorised access to the shipping, loading dock and cargo areas should be prohibited.

Controls should include:

- The positive identification of all employees, visitors and Suppliers.
- Procedures for challenging unauthorised/unidentified persons.

## Procedural Security

Measures for the handling of incoming and outgoing goods should include protection against the introduction, exchange, or loss of any material.

Security controls should include:

- Assignment of a designated security officer to supervise the introduction/removal of cargo.
- Properly marked, weighed, counted and documented products.
- Procedures for verifying seals on containers, trailers and railcars.
- Procedures for detecting and reporting shortages and overages.
- Procedures for tracking the timely movement of incoming and outgoing goods.
- Proper storage of empty and full containers to prevent unauthorised access.
- Procedures to notify Customs and other law enforcement agencies in cases where anomalies or illegal activities are detected or suspected by OfficeMax.

## Container and Trailer Security, Container Inspection

Container and trailer integrity must be maintained to protect against the introduction of unauthorised material and/or persons. At the point of loading, procedures must be in place to properly seal and maintain the integrity of the shipping containers and trailers. A high security seal must be affixed to all loaded containers and trailers bound for the U.S. All seals must meet or exceed the current PAS ISO 17712 standard for high security seals.

Procedures must be in place to verify the physical integrity of the container structure prior to stuffing, including the reliability of the locking mechanisms of the doors. A seven-point inspection process is recommended for all containers:

- Front wall
- Left side
- Right side
- Floor
- Ceiling/Roof
- Inside/Outside doors
- Outside/Undercarriage

## Trailer Inspection

Procedures must be in place to verify the physical integrity of the trailer structure prior to stuffing, including the reliability of the locking mechanisms of the doors. The following five-point inspection process is recommended for all trailers:

- Fifth wheel area - check natural compartment/skid plate
- Exterior - front/sides
- Rear - bumper/doors
- Front wall
- Left side

## Personnel Security

Suppliers should conduct pre-employment screening and interviewing of prospective employees, including background checks and application verifications.

## Education and Training Awareness

A security awareness program should be provided to employees, including recognising internal conspiracies, maintaining product integrity, and determining and addressing unauthorised access. These programs should encourage active employee participation in security controls. Employees must be made aware of the procedures the supplier has in place to address a situation and how to report it.