



Distributor Code of Conduct

Norstone distributor code of conduct

The Norstone Distributor Code of Conduct (“Distributor Code”) sets forth principles that Norstone has adopted to promote ethical conduct in the workplace, safe working conditions in Norstone’s supply chain, treatment of workers with respect and dignity, and environmentally responsible processes.

As used in this Distributor Code, “Norstone” refers to Norstone USA INC, Norstone UK Ltd, Norstone Pty Ltd. and its controlled affiliates and business organisations.

Norstone embraces diversity and legal compliance as fundamental principles and key components of its corporate strategy. It is our desire that all Norstone suppliers, their distributors or appointed agents and their permitted subcontractors similarly embrace diversity and equal opportunity to the fullest extent possible. All distributors must operate in full compliance with the laws, rules and regulations of the jurisdictions in which they operate, and they must act ethically at all times.

In all aspects of the Norstone /Distributor working relationship, Norstone’s Distributors, their appointed agents and permitted subcontractors shall support Norstone’s core values by conducting business with integrity, by treating others with respect, by striving for performance excellence and by accepting accountability for their conduct.

Norstone reserves the right to review or audit vendor compliance with this Code.

The Norstone Distributor Code of Conduct is not intended to create new or additional third party rights or obligations to third parties, including any rights of, or obligations to, employees of distributors. It supplements, but does not supersede, any rights maintained by Norstone under any contract with any Distributor.

ETHICS AND STANDARDS OF CONDUCT

Norstone Distributors, their appointed agents and permitted subcontractors are expected to conduct business with integrity and mutual respect and to uphold the highest standards of ethics and behaviour, including:

1) Business Integrity

Any and all forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited and may result in termination of any or all distribution contracts or supply agreements with Norstone and possible legal action. Records prepared for Norstone, including but not limited to records of sales and expenses, shall be accurate, truthful and complete, and shall meet applicable standards and requirements.

2) Company Information

Confidential and proprietary information addressing matters such as Norstone's business activities, strategies, plans, structure, technology, customers, financial situation and performance is critical to the company's success, and cannot be disclosed or used, except in accordance with applicable regulations, contractual requirements and this Code. It is paramount that our distributors safeguard Norstone's information.

Distributors must:

- Understand any specific requirements for using Norstone's information and, when not sure, seek guidance from Norstone.
- Comply with applicable non-disclosure agreements and contractual confidentiality requirements regarding information belonging to or in the possession of Norstone.
- Never misuse or disclose confidential or proprietary information to unauthorised parties.
- Use caution when discussing non-public information in public or any place where others may overhear.
- Safeguard and appropriately handle information regarding the Norstone trademark, brand or logo.
- Secure Norstone's written approval before using information about Norstone or Norstone's name or brand identity publicly in any publicity, advertising or website.
- Not access, use, copy, manage, store or process company information without the prior written approval of Norstone.

3) Competitor Disparagement and Obtaining Information

Norstone competes based on the strength of its products, services, reputation, and fair and accurate comparisons with its competitors. Distributors should not make unfair, misleading, or inaccurate comparisons with the products and services of Norstone's competitors. Norstone acquires competitive and other information only using proper means and without misrepresentation, and Norstone's distributors, their appointed agents and permitted subcontractors shall similarly do so.

4) Advertising and Marketing

If a Norstone Distributor is, with Norstone's prior written approval, engaged in any advertising, marketing or promotional activities that reference or implicate Norstone, its name, logo or services in any manner, such materials must comply with all laws, rules and regulations, and must be truthful and accurate.

Materials must not be false, misleading or have a tendency to deceive, and all claims must be substantiated. All distributor's advertising must make clear and conspicuous disclosure of material terms and limitations of advertised offers.

5) Conflicts of Interest

Distributors should avoid engaging in any business activity that would conflict or interfere with their provision of products and services to Norstone.

6) Business Courtesies

Norstone's Distributors, like Norstone, are expected to compete based on the merit of their products and services, not through gifts, entertainment, or other business courtesies. Although business courtesies can promote successful working relationships and good will, Norstone expects its distributors to follow all applicable laws and Norstone's rules and procedures with respect to gifts, entertainment, and other business courtesies when representing Norstone.

7) Working with the Local Government

When interacting with local government bodies and agencies, and their representatives, Norstone's Distributors must conduct themselves with honesty and integrity, and comply with all applicable laws and regulations, including, but not limited to, laws and regulations relating to government ethics, lobbying and the handling of confidential, classified and other government information.

8) International Business

Norstone conducts business around the world in compliance with applicable law and in consideration of both International and local standards and customs, and in a manner that fosters Norstone's reputation as an esteemed company with which to conduct business, such as: (a) only lawfully transferring Norstone products, information or knowledge across borders, (b) only making proper and permissible payments to appropriate parties whilst conducting business., and (c) only exchanging business courtesies according to Norstone standards and local law.

9) Customer and Employee Privacy and Personal Information

As a Norstone Distributor, you have an important role in helping Norstone to sustain our customers' and employees' confidence in the company, its products and services. To meet these concerns, you must use care in working with all customer and employee information and communications, safeguard such information as, required under your contracts with Norstone and this Code, and only access such information as authorised.

"Personal Information" shall be information that, either alone or in combination with other data, identifies or uniquely relates to an individual, such as an individual's name, financial account numbers (e.g., credit or debit card number or bank account information)

10) Reporting Concerns or Misconduct

Distributors must report concerns and potential or actual misconduct that violate this Distributor Code of Conduct. Distributors shall, consistent with any applicable law and privilege, provide reasonable assistance to any investigation by Norstone of a violation of the Distributor Code of Conduct. When reporting suspected or actual misconduct, distributors should report concerns relating to the incident by email at info@norstone.global

11) Health and Safety

Norstone Distributors must conform to all applicable health, safety and environmental laws and regulations. Distributors and their employees are obliged to identify and resolve health and safety issues in the workplace, and these are critical to the overall success of a safety and health program.

Every distributor shall be committed to the safety and health of its employees, and shall ensure that required training of personnel has been completed prior to initiating any work activity. The distributor should have or subscribe to a written occupational health safety program.

ENVIRONMENTAL

Adverse effects on the community, environment and natural resources are to be minimised while safeguarding the health and safety of the public.

Distributors must comply with all applicable health, safety and environmental laws and regulations when conducting business under Norstone banner.

By way of example and not limitation, Norstone's Distributors must:

- 1) obtain and keep current all required environmental permits and registrations;
- 2) reduce, control and/or eliminate wastewater, waste and pollution at the source.
- 3) dispose of waste material such as stone offcuts, timber or packaging in accordance with local requirements for disposal of waste.

MANAGEMENT SYSTEM

Distributors must manifest their commitment to implementation of the principles of this Distributor Code by having or establishing an appropriate management system to address compliance with these principles and detection and correction of any non-compliance. An appropriate management system should contain the following elements:

1) Management Accountability

Executive responsibility for ensuring implementation and periodic review of the status of the management systems.

2) Legal and Customer Requirements

Identification, monitoring and understanding of applicable laws, regulations and customer requirements, and procedures for reviewing compliance and correcting any deficiencies.

3) Communication

Process for communicating clear and accurate information about Distributor's performance, practices and expectations to employees, agents, sub-contractors and customers.