

# One Air New Zealand

## Doing what's right







## A message from Christopher

**Our airline plays a pivotal role in supercharging New Zealand's success environmentally, socially and economically. And that's a big responsibility we take very seriously. We can only fulfil this role with the trust of our colleagues, customers, shareholders, business partners and communities.**

Our Code of Conduct reflects the way we do things here at Air New Zealand, setting out the standards expected of everyone who works for the airline around the world.

Our goal is to model what a truly great New Zealand organisation looks like, so we're working extremely hard to drive a high performance culture – a culture where people go above and beyond to deliver their very best. Part of this means thinking, acting and working as One Air New Zealand so there's consistency right across the airline.

To help unify our people, our Brand Values and our Leadership Behaviours are integrated into every aspect of our culture and service delivery, and guide us as to what we look like 'at our best'.

Please take the time to read through these pages and apply the principles to the work you do every day.

I'm proud to work for a global organisation that is committed to doing what's right and building a culture based on honesty, integrity, transparency, mutual respect and the freedom to speak up.

**Christopher Luxon**  
Chief Executive Officer



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# ABOUT OUR CODE OF CONDUCT

# What is it?

The Code of Conduct (Code) sets out what we expect from every person working for and with Air New Zealand, regardless of location, and confirms our commitments to our people, our business partners and stakeholders.

The Code brings together all of our policy principles, and provides a working guide for employees to do the right thing when making decisions in our daily activities.

It's not a 'nice to have' document – it is absolutely essential. We need all Air New Zealanders to read, understand and live by this Code.

While the Code provides guidance on standards of integrity and business conduct, it doesn't attempt to address every situation that we might encounter. Use this direction on what we value and key principles to guide your behaviour and decisions, keeping in mind our Brand Values and Leadership Behaviours which underpin all of our actions.

**We need all Air New Zealanders to read, understand and live by this Code.**

# The Code applies to all of us

The Code applies to all Air New Zealanders globally – including our executives, employees, contract workers or agents who provide services on our behalf, subsidiaries, and directors.

In addition, we expect our suppliers and business partners to uphold equally high standards, and abide by our Supplier Code of Conduct.

# Comply with the law

Our Code reinforces our commitment to both the letter and spirit of our legal requirements and our policies, standards and business principles.

The airline industry is highly regulated by local government and the governments of other countries where we do business. Without exception, Air New Zealand observes and complies with all applicable laws, rules and regulations.

However, our Code cannot cover all laws, regulations and other legal requirements in all countries we operate in. Always be familiar with the relevant laws and regulations that apply where you work. If there is a difference between a local legal requirement and our Code, apply the most stringent standard. If in any doubt, contact your manager or our Legal team.

# Refer to the Code and ask questions

Please read the Code and refer to it often. It isn't something you read once and forget about. It's your guidebook for doing what's right. To supplement the general guidance of the Code, Air New Zealand has more specific policies and standards that apply globally, geographically or to certain divisions, functions or departments.

Take the time to understand the policies that are referred to throughout the Code and how they apply to you in your role. You are encouraged, and expected, to seek additional help whenever you have questions or aren't sure about the right course of action. Managers, Human Resources and our Governance, Risk and Compliance team are available to help you if you need them.

# Make a commitment

**As Air New Zealanders, we are all expected to live our Leadership Behaviours and 'do what's right' in our daily work and actions:**

- Act safely, ethically and responsibly – taking pride in your actions and decisions.
- Comply with the principles in this Code and fulfil your legal and regulatory obligations.
- Hold your colleagues accountable for behaving ethically and following this Code and legal requirements.
- Speak up if you see unsafe or unethical behaviours or if it breaches our Code.

**Our leaders have additional responsibilities under the Code:**

- Enforce the Code consistently for all your employees.
- Where there is a conflict between our ethics and business objectives, our ethics must always come first.
- Support appropriate business conduct and ethics compliance activities.
- Make sure appropriate controls are in place in your team.
- Never cover up or ignore any business conduct or ethical problem; address the matter immediately and seek guidance if necessary.
- Encourage your team members to ask questions and raise any conduct or ethical concerns by:
  - Encouraging them to speak up
  - Dealing with concerns when they are raised
  - Making sure that no one who speaks up is treated unfairly as a result.



# Speak Up

Don't ignore behaviour that is unacceptable, even small things, because we believe small actions can make a big difference.

We encourage everyone to raise concerns about potentially unethical or illegal conduct, while assuring confidentiality and protection against retaliation or any form of harassment. Our Just Culture policy and procedures support a fair and confidential process.

If you see behaviour at work that you feel may breach this Code or seems illegal or unethical – like bribery, theft or fraud, price fixing or a breach of data privacy – you must report it, even if you only suspect it.

You must also report abuse of our systems, processes or policies. This could be bullying or harassment, potential conflicts of interest, or danger to the health and safety of employees or customers.

There are three ways to speak up:

- **Report it to your manager**  
We know it's not always easy to raise your concerns. However, we value open and honest communications, so you're encouraged to discuss any issues or potential issues with your manager.
- **Report it to your Human Resources team**  
If it's not appropriate to discuss the issue with your manager, you should discuss it with your HR Business Partner. Every business area has at least one HR Business Partner – ask your manager if you don't know who yours is.
- **Report it confidentially using the Speak Up line**  
You may want to report your concern to someone who is independent from the situation. Click on Speak Up on the Korunet to find local free phone numbers or to make a report online.

Air New Zealand has a non-retaliation policy when a genuine concern has been reported. No action will be taken against you if you report concerns, even if proven to not result in a breach.

For safety-related incidents or issues, continue to use our safety reporting process as a first priority.

If you are faced with a difficult issue, ask yourself:

- ✓ Is it legal and ethical?
- ✓ Is it consistent with our Business Principles and Leadership Behaviours?
- ✓ Does it comply with our policies?
- ✓ Can I explain it to family, friends or colleagues?
- ✓ Will I be comfortable if it appears in the media?

**Q.** I am concerned that my colleagues will find out if I raise a concern. Will it be kept confidential?

**A.** Yes, Air New Zealand will not tolerate retaliation against anyone who raises, in good faith, a genuine concern. We will keep what you tell us private throughout the investigation process, subject to our legal obligations. Your issue will be kept confidential regardless of which method you use to report it.

**Q.** I have a concern about the actions of a colleague. How should I report this?

**A.** The most important thing is that you report your concern. It doesn't matter which route you choose. If you feel comfortable talking to your manager, do that. Your manager is there to support you and can help you choose the correct course of action. Alternatively, you can contact your HR business partner or use the Speak Up line.

**Q.** I am a contractor working with Air New Zealand and I have a concern to report. Can I use the Speak Up reporting line?

**A.** Yes, the Speak Up line is for employees and contract workers, as well as suppliers and business partners.

**Q.** I don't fully understand one of the policies, who should I speak to?

**A.** Your line manager can help you if there are aspects of the policy you don't understand. If further clarity is needed, you can talk to someone in HR, or Governance, Risk & Compliance.

**Q.** What if I report something suspicious that turns out not be a breach of compliance?

**A.** As long as your report was made in good faith because of a genuine concern, no action will be taken against you.

The standard you walk past is the standard you accept.

LT. GEN. DAVID MORRISON  
AUSTRALIAN ARMY CHIEF



# OUR BUSINESS PRINCIPLES

# Our Business Principles

Our Business Principles are the foundation of how we do business everywhere we operate, and reflect the commitments we make to our people, our business partners and stakeholders. These are at the heart of our Code of Conduct.

## Operate Safely, Responsibly and Reliably

- We will protect the health, wellbeing, safety and security of our customers, employees and the communities in which we operate.
- We will not tolerate anyone being affected by alcohol or other drugs in the workplace.
- We will operate our business with discipline and excellence to ensure sustainability, resilience and effectiveness.
- We will protect and safeguard the natural environment, minimising our use of finite resources and the release of harmful emissions to the environment.
- We will invest in society and communities ensuring effective use of our resources and in line with our mission.

## Act with Integrity, Honesty and Transparency

- We will avoid any activity or contracts that may lead to, or suggest, a conflict of interest between personal activities and Air New Zealand.
- We will build trust through integrity, transparency, honesty and objectivity in our business dealings and relationships.
- We will use business resources in the best interest of Air New Zealand and not for personal gain.
- We will communicate honestly, responsibly and with transparency with all stakeholders within the bounds of commercial confidentiality.

## Protect our People, Property and Information

- We will base our investment decisions and business relationships on economic criteria from objective and complete due diligence information.
- We will not commit to expenditure without appropriate authorisation.
- We will only spend company money where there is a legitimate business need and where the cost is worth the benefit.
- We will take into account social, ethical and environmental considerations in our procurement and supply chain decisions.
- We will secure and safeguard our confidential and sensitive information from improper disclosure to prevent harm to Air New Zealand, our stakeholders, employees or customers who have trusted us with their information.
- We will protect and safeguard our brand, property, intellectual property and financial assets.
- We will respect people's legal rights to privacy and the confidentiality of personal information.

## Comply with the Law

- We will comply with all applicable domestic and international laws and regulations, appropriate standards and principles, including all competition, anti-trust and anti-money laundering laws.
- We will not tolerate any form of bribery, including improper offers of payments or gifts to or from employees.

## Treat People Fairly and with Respect

- We will treat people fairly, with dignity and will pursue equality of opportunity and inclusion for all employees through our employment policies and practices. We value diversity of people and thought.
- We will recruit, select and develop our people on merit – irrespective of age, race, colour, origin, gender, religious beliefs, disability, family or marital status, sexual orientation or other prohibited grounds.
- We will not accept any form of discrimination, harassment or bullying.
- We will perform at our best, demonstrating professionalism, living our values and operating with acute customer focus at all times. We will proactively address underperformance.
- We will work in good faith, within the appropriate legal framework, with trade unions and other bodies that our people collectively choose to represent them.
- We trust each other to deliver on our commitments and obligations, and value collaboration as the best means of working together to achieve superior outcomes.
- We will empower our people to enhance their personal potential by offering satisfying and challenging work and career opportunities, investing in development and personal growth.
- We will reward and recognise our people for work which contributes to our mission to supercharge New Zealand's success, and for demonstrating the right behaviours that reflect our values.
- We will respect people's lives outside of work, balancing life activities, and valuing their contribution to society.
- We will not tolerate child labour and are committed to the elimination of all forms of forced and compulsory labour.







**OPERATE  
SAFELY,  
RESPONSIBLY  
AND RELIABLY**



# Safety and Employee Wellbeing

Safety at Air New Zealand is a top priority. We are committed to achieving a zero harm work environment and instilling a culture of safety and continuous improvement. Our safety management systems (SMS) and quality processes are used to continually evaluate and improve our aviation and workplace safety performance.

We expect everyone at Air New Zealand to behave in a safe and responsible manner at all times.

What this means for you:

- You are responsible for your own safety and wellbeing, and the safety of your colleagues and our customers.
- Only undertake work if you are medically fit for duty, sufficiently rested and alert enough to carry it out.
- Comply with applicable safety laws and follow the safety procedures and requirements specific to your area.
- Never compromise on safety or knowingly create situations where the safety and wellbeing of any person is put at risk. Intervene where you see unsafe practices.
- Prevention is critical – identify and report any hazards.
- Report events immediately where safety and wellbeing have been compromised, including any incident, accident, injury, illness, unsafe or unhealthy condition.
- If injured, ensure you do all you can in your recovery and rehabilitation for a safe and timely return to work.
- Always drive safely, responsibly and legally when operating company vehicles or on company premises.
- Where your attention to safety is critical, limit using mobile devices in the workplace.

**Q.** Should I report a small incident, even if it didn't result in an accident or injury?

**A.** Yes. Report any incident no matter how small. Tell your manager straightaway so we can take action to prevent similar incidents happening in the future.

**Q.** If I report a safety issue, will I get in trouble if I'm the one who made the error?

**A.** No, as long as it wasn't done recklessly or with malicious intent. We are all human and sometimes we genuinely make mistakes or errors. We encourage everyone to report any safety-related incident or situation without fear of retaliation or punishment. Being open and honest about safety issues is important to our Just Culture philosophy and helps us prevent any future safety risks.

**Q.** I see colleagues talking on their mobile phones while driving all the time. Is this ok?

**A.** No. Nobody should use a hand-held mobile device while driving any vehicle used for work purposes, including vehicles such as baggage trolleys and forklifts.

**We will protect the health, wellbeing, safety and security of our customers, employees and the communities in which we operate.**



**We will not tolerate anyone being affected by alcohol or other drugs in the workplace.**

# Avoiding Alcohol and Other Drugs

Alcohol and other drugs must never affect us in our work. Our safety, and that of our colleagues and customers, depend on it. Therefore, you must maintain a zero blood alcohol level and be drug free while working. This includes being free from the negative effects of legal drugs, such as prescription medication. Any possession, use, sale or distribution of illegal substances at work will be treated very seriously. Air New Zealand provides support to those affected by problems with alcohol or other drugs.

**What this means for you:**

- **Never, under any circumstances work, while affected by alcohol or any other drug that impairs judgement, performance or behaviour – be drug free and maintain a zero blood alcohol level.**
- **Never drive a vehicle used for business purposes during work hours or on work duties if you aren't drug and alcohol free.**
- **Don't use, sell, distribute or be in possession of alcohol or other drugs while working or while on our premises.**
- **Discuss with the Medical team prescription medication or other legal drugs which may impair your ability to work.**
- **Don't store or consume alcohol on our premises unless it's authorised (e.g. sponsored and supervised functions).**
- **Report in confidence any concerns you have about your own use, or a colleague's, use of alcohol or other drugs to our Medical Team for support and advice.**
- **You may be required to undergo alcohol and other drug testing for safety sensitive roles and where there is cause.**

**Q. What if I'm on call after hours and at weekends? Does this mean that I am unable to consume alcohol for that period of time?**

**A.** Being on call to respond to work related situations is typically considered to be 'on duty' or an extension of your duties. Therefore, if you are rostered or paid to be on call, you must remain alcohol and drug free. In cases where you are called on for work when you're not expecting it, safety must always come first – so let the caller know if you're not alcohol or drug free so they can find an alternative person.

**Q. I have been invited to a corporate function held after hours. Am I allowed to have a drink there?**

**A.** Any time you are representing Air New Zealand at a function, keep in mind that your behaviour will reflect on the Company's reputation. Alcohol consumption in social settings and at corporate functions after hours is acceptable, provided that all formal business has been completed, alcohol is used responsibly, and you are not on call or otherwise expected to return to work. Also, ensure you are within legal limits if driving afterwards.

**Q. What about drinking while I'm on Duty Travel?**

**A.** Any time you are travelling for work, use good judgement. Ensure that any consumption of alcohol before, during or after travelling will enable you to comply with the policy when you are next expected to work. Familiarise yourself with local drug and alcohol laws, cultures and customs when travelling for business purposes.

**We will operate our business with discipline and excellence to ensure sustainability, resilience and effectiveness.**

# Crisis, Emergency and Business Disruption Management

Crisis, emergency and business disruption management is important to protect our people and reduce any damage or loss. We must retain a high level of preparedness to respond to any type of business interruption in any location where we might have people, property or assets. Effective crisis, emergency and business disruption planning ensures we're committed to health and safety, minimising damage and impact to the Company and keeping our operations going after any disaster.

**What this means for you:**

- **Know your individual responsibilities and follow crisis, emergency and business disruption procedures, including knowing local emergency contact details.**
- **Assist in developing and implementing local crisis, emergency and business disruption plans for your business area as requested.**
- **Continually assess risks and any financial, reputational and other non-financial threats that may impact your business area.**
- **Test and practice your crisis, emergency and business disruption procedures to improve response preparedness.**
- **Debrief following an event to ensure lessons are learned and actioned.**







## Airline Security

Global security remains volatile and we take our safety and security seriously. We are all responsible for having a high level of security awareness and consistently applying appropriate security measures to protect our customers, employees, assets, premises and property in our care.

### What this means for you:

- Always wear your security ID in secure areas so it is visible to others – make sure it's current, accurate and valid for the area in which you work (restricted vs non-restricted).
- Immediately report to our Security team any actual or perceived security risks, weaknesses, threats, or unusual or suspicious activity or behaviour.
- Vigilantly adhere to safety and security protocol, standards and practices at all times and follow requirements specific to your area.
- Never bring unauthorised individuals into secure areas without the appropriate security checks and authorisation. Always escort your visitors while they are on the premises – never leave them alone in secure areas.
- Report any loss of property straight away, including security ID cards, Air New Zealand uniforms or branded work wear, to local Police and our Security team.
- Store equipment and other property securely to prevent unauthorised use or theft.
- Read travel advisories and security tips before travelling overseas for business.

Refer to the Information Security section for protecting and securing data and information.

**Q.** I've seen people 'tailgate' me through the security doors without swiping their card. What should I do in these situations?

**A.** Tailgating through security access doors is not permitted – you must swipe through. Next time this occurs, politely ask the tailgater to swipe their own card, and ensure you're not followed through the security door.

**Q.** I've noticed visitors walking around the office unescorted without a security ID or visitors badge on. Is that OK?

**A.** No. People must be authorised to be taken into secure areas (any area that requires a password or swipe entry). All visitors must register at reception, wear a security badge to enter a secure work area and be escorted by an Air New Zealander at all times. If you see someone without a visible ID, first phone Security to report the breach, then approach the person and politely question who they are here to see, then escort them to the main reception area to wait for their contact.

**Q.** Part of my uniform went missing from my hotel room on my last Tour of Duty. Is that a big deal?

**A.** Yes. Uniforms should be treated as an item of security. You must report any theft or loss of a company uniform to Police and our Security team. There is a very real possibility that lost or stolen uniform items could be used to do harm by someone posing as an employee to get into secure areas.

**Q.** Should I report a small incident, even if it didn't result in major security breach?

**A.** Yes, report it to the Security team. Without knowledge of security incidents or events – including potential threats – we are not able to fully assess risk. What you might think is an isolated incident may, in fact, be one piece of a larger puzzle.



**We will invest in society and communities ensuring effective use of resources and in line with our mission.**

## Environment Sustainability

We are committed to preserving and protecting New Zealand's natural environment for the future. We take responsibility for operating in an environmentally sustainable way, minimising Air New Zealand's impact on the environment and improving our energy performance.

**What this means for you:**

- Comply with applicable environmental laws and regulations.
- Report any non-compliance with environmental laws and regulations to your Property and Facilities Manager.
- Do your bit to reduce, recycle, re-use and be energy efficient in your work environment.
- Support using and procuring sustainable energy efficient design, products and services to help improve our energy performance.
- Educate, support and encourage others (including suppliers and customers) to take responsibility for efficient energy practices in their workplaces and communities.
- Support company environmental sustainability initiatives.

**We will protect and safeguard the natural environment, minimising our use of finite resources and the release of harmful emissions to the environment.**

## Sponsorship, Grants and Donations

As New Zealand's national carrier, we are committed to using our resources to enrich our communities, protect the environment and promote New Zealand. We support legitimate and worthy causes aligned to our purpose, mission and values, including those based on humanitarian needs. Through proper governance of grants, sponsorships and donations we protect Air New Zealand's reputation with all stakeholders.

**What this means for you:**

- Work within established processes regarding sponsorship, grant or donation requests or decisions.
- Never request sponsorships or use company money to make charitable donations to close deals, seek favours from decision makers, or for personal gain.
- Raise questions about any potential conflict of interest or appearance issues that may arise from charitable donations or sponsorships.
- Never use company money to make donations to political parties, campaigns or candidates.

**Q.** I serve on the board of directors of a non-profit organisation that supports environmental initiatives. Can I guarantee the board that Air New Zealand will donate to the organisation?

**A.** No. You must make clear that your participation on its board is in your individual capacity and that it is unlikely that you will be able to secure any donation from Air New Zealand. If the organisation has historically received donations or has a formal relationship with us, disclosure of the directorship is required in advance of you accepting a board position.

**Q.** My team wants to raise money for a local charity. Are there any restrictions on who to donate to?

**A.** No, there are no restrictions on giving personal donations. We support and encourage charitable activity. However, unless sponsored through Air New Zealand, these should be done in your own time and with your own resources.

We're proud to partner with the Department of Conservation bringing some of New Zealand's rarest birds back to their natural homes.





**ACT WITH  
INTEGRITY,  
HONESTY AND  
TRANSPARENCY**



# Be Free of Conflicts of Interest

We must all be free from actual, perceived or potential conflicts of interest. 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. Whenever possible, conflicts of interest should be avoided. If they arise, always disclose them immediately. Even the appearance of a conflict of interest can be harmful and needs to be addressed.

**Q.** Do conflicts of interest include people I have close personal relationships with as well as actual relatives?

**A.** Yes. Any close relationship, no matter how current, that may create an actual or perceived conflict of interest is included. We can't list every activity or relationship. However, a conflict of interest includes any activity that could interfere with your objectivity to Air New Zealand.

**Q.** My colleague's son just joined our team. Is this allowed?

**A.** Unless local policy prohibits it, relatives can work in the same team, department or business unit. The only rule is that no person can ever be in a position to either hire, supervise, affect the terms and conditions of employment or influence the management of a relative.

What this means for you:

- **Act in Air New Zealand's best interest and make objective decisions.**
- **Discuss conflict of interest concerns with your manager, disclose all conflicts and report them on the Conflicts of Interest Register.**
- **Remove yourself from decisions or processes where you have a personal interest.**
- **Never get involved in hiring, supervising, managing, promoting, rewarding, or advancing any relative, close friend or partner.**
- **Never affect or influence the terms and conditions of a contract for service, or for employment, of any employee, contractor or supplier who is a relative, close friend or partner.**
- **Avoid working or consulting for, or providing professional services to, anyone external that you deal with as part of your job for Air New Zealand.**
- **Never use business resources for personal political activity, make political donations in Air New Zealand's name, or give the impression that the Company endorses any candidate, campaign or political issue.**
- **Never provide sensitive or confidential information to a competitor or third party, including friends or relatives – see the Competition Law section.**

See our Subsidiary Directorship and Industry Associations Policy for information on the invitations for directorships within the Air New Zealand Group or for Group representation on industry association boards/committees.

**Q.** I work part-time in my family's business. Do I need to disclose an interest?

**A.** Yes, even if the business is not related to Air New Zealand, you must disclose it, as it may become a conflict if it affects your health, job performance or the quality of your work.

**Q.** A close friend is applying for a job at Air New Zealand. Is this ok?

**A.** Absolutely. We encourage you to recommend Air New Zealand as a great place to work. However, you need to ensure that you are not involved in the recruitment process and that the job your close friend is applying for does not report to you (either directly or indirectly).

Here are some examples of when you might face a conflict of interest.

Friends, relatives and co-worker relationships

Business relationships with relatives, spouses, partners/ significant others or close friends can lead to a conflict of interest. We don't prohibit family members or friends from being employed by the Company, or close personal relationships between co-workers. However, a relative or close personal friend cannot have any business dealings with you, anyone who reports to you (direct or indirect report), or anyone working in your business unit. Similarly, intimate relationships of any duration between co-workers can, depending on the work roles, create an actual or apparent conflict of interest.

If you are faced with the possibility of a business or personal relationship conflict of interest, you should disclose it to your manager, so the potential conflict can be mitigated.

We must all exercise care when providing travel services to relatives, friends or co-workers. Providing preferential treatment to them is not allowed – this includes unauthorised deviations from established rules for pricing, issuing, exchanging or refunding tickets, inappropriate upgrades, improperly withholding seats from inventory or blocking space and ignoring boarding priorities.

## We will avoid any activity or contracts that may lead to, or suggest, a conflict of interest between personal activities and Air New Zealand.

Outside activities or investments

You may have a personal interest in one of Air New Zealand's existing or potential competitors, suppliers or customers, which might affect or compromise our business, or your ability to perform your job. These situations can create an actual or perceived conflict of interest if they involve you:

- Having a second job
- Serving as a director or consultant, or providing professional services
- Having material financial interests in a competitor, supplier or customer, or
- Taking part in civic or public duties.

As a general rule, you may work, or consult, for other organisations while employed at Air New Zealand as long as you inform your manager and gain appropriate approvals from the Legal team before accepting the work. Outside activities should not interfere or conflict with your job responsibilities – for example, scheduled hours, overtime when required, or job performance. This includes selling goods or services for personal profit during work time or using your employment at Air New Zealand as an endorsement for personal business.

Knowingly maintaining substantial financial interests or investments in a competitor, customer or supplier without disclosing them is not allowed.

Political or civic involvement

If you are involved in civic or political activities, it must be on your own time and with your own resources. You should never use Air New Zealand resources such as time, property, material, cash, equipment or branding for political donations or activities.

We will build through integrity, transparency, honesty and objectivity in our business dealings and relationships.

## Using our Digital Communication Systems

For many of us, the use of the Company's intranet, internet, phone and email systems is critical to our jobs. Air New Zealand invests in strengthening our digital workforce and provides access to a range of IT resources to connect and collaborate as one Air New Zealand. These systems and resources, such as Wi-Fi, are intended to be used for business purposes. As a user of these resources, you have access to valuable information, sensitive data and internal and external networks that must be protected and used responsibly.

What this means for you:

- **Use digital communication systems and other IT resources in a responsible, ethical and legal manner. Don't use them for any illegal, unethical, or objectionable activities such as gambling, pornography or other inappropriate subject matter.**
- **Don't use company computers and equipment for outside businesses, personal gain or personal activities.**
- **You are personally accountable and liable for all activities associated with your user accounts and company equipment.**
- **Incidental personal use of IT resources (email, internet, social media) at work is acceptable as long as it:**
  - doesn't affect your, or others', job performance or productivity, and
  - doesn't interfere with operations or system performance (e.g. sending large personal files) or consume significant time or resources, and
  - doesn't create risk to Air New Zealand as a result of your personal use, and
  - doesn't violate other company policies.

**Q.** I use a range of internet and social media sites for my job. Why are some sites blocked?

**A.** We encourage the use of the internet for research, training and collaborating in the context of your job. Some sites are not appropriate for the workplace, don't have appropriate levels of security or are used predominately for personal use. In these cases, the sites have been blocked. If you run into issues, contact the IT Service Desk for information and assistance.

**Q.** I recently noticed that a colleague in my department spends a lot of work time on the internet and social networking sites, despite a backlog of incomplete projects. Is this ok?

**A.** No. Personal use of company resources (including Internet and email) should be limited and never interfere with job responsibilities. Your colleague's use of social networking sites is likely to be excessive. You should report the issue to your manager.

## Exchanging Gifts and Entertainment

We support reasonable and proportionate giving and receiving of gifts and entertainment as part of a normal business relationship or cultural practice. They're permitted as long as they're ethical, related to Air New Zealand business, infrequent, low in value, legal and customary in a business relationship. We prohibit the giving or receiving of significant gifts or significant benefits (including hospitality, discounts and other benefits not available to all employees).

We need to ensure we are never influenced, or seen to be influenced, by gifts or entertainment or other inducements during a tender process or when signing a new deal. These actions can create conflicts of interest, or raise questions about our judgement.

What this means for you:

- **Seek approval and record gifts, hospitality and entertainment on the Gifts Register if valued at NZ\$250 or more.**
- **Avoid giving or accepting anything of inappropriate value.**
- **Avoid giving or accepting any gifts or entertainment during a tender process that would be perceived as preferential treatment or providing an unfair advantage.**
- **Think about the context of the gifts, entertainment or hospitality – imagine how it might look to someone outside of Air New Zealand.**
- **Never accept any cash or cash equivalent, even as a tip for great service.**
- **Never give or accept gifts from competitors or public officials.**
- **Never ask for gifts, entertainment or any other inducements.**

Review the Bribery, Corruption and Improper Payments section for additional guidance on inducements.

**Q.** I've been sent a high value gift by a supplier and don't want to cause offence by returning it. What should I do?

**A.** Notify your manager and seek guidance from the Legal team. Ideally, you should politely refuse and return the gift. If this is not possible, then the item should be donated to charity.

**Q.** I work at checkin. A regular customer offered me a tip as thanks for taking care of a reconnection on his last trip. He then asked me to upgrade him to business class outside of appropriate guidelines. What should I have done in this situation?

**A.** The best course of action is to thank the customer for their thoughtfulness and politely decline accepting the tip, ensuring that you don't deviate from established rules regarding upgrades.

**Q.** A colleague in my team manages the relationship with a wholesale travel agency on behalf of Air New Zealand. Last week, I heard the agency offered my colleague a significant discount for personal travel that isn't available to other employees. Is this allowed?

**A.** No. By offering this discount to your colleague, which is not available to all employees at Air New Zealand, the agency created a conflict of interest between official company business and your colleague's personal gain.



A photograph of an airplane wing in flight, viewed from the passenger side. The wing is dark and sleek, with visible flaps and ailerons. Below the wing, a thick layer of white and grey clouds stretches across the horizon. The sky is a mix of soft orange, yellow, and blue, suggesting a sunset or sunrise. The overall mood is serene and expansive.

We need all  
Air New Zealanders  
to read, understand  
and live by this Code.

**We will use business resources in the best interest of Air New Zealand and not for personal gain.**

# Using Business Resources

Resources are provided to you to perform the requirements of your job. We must all use business resources responsibly and only for business purposes. All business resources have an economic value, so use them effectively.

**Common business resources include:**

- IT resources and computer equipment including access to electronic information, networks, software, internet, systems and equipment such as desktops, laptops, phones, and mobile devices
- Business-related travel
- Budgets, expenditure and company credit cards
- Office furniture, equipment and supplies
- Branded material and official company images and content
- Company-provided vehicles and car parks.

**What this means for you:**

- **Use business resources and assets for company business – this includes money, equipment, materials, information and time.**
- **Only use resources that you are authorised to use and complete all necessary authorisations.**
- **Only access or use authorised resources or information where there is a legitimate business need and not for personal interest or gain.**
- **Use resources responsibly and cost effectively.**
- **Don't engage in personal activities during work hours that interfere with you fulfilling your job responsibilities.**
- **Take all reasonable and necessary steps to protect company resources and assets, including the prevention of theft.**
- **Use business resources in line with our confidentiality and privacy guidelines.**

**Q.** I've seen colleagues checking out flight details and seat assignments of celebrities who fly on Air New Zealand. Is this allowed?

**A.** Definitely not. Unless these individuals are directly booking or altering a customer's travel plans, employees are not allowed to access confidential information out of personal interest. We should always protect the identity, privacy and safety of our customers.

**Q.** I sometimes use my company laptop to respond to personal emails, do my personal online banking and for other personal activities at home? Is this ok?

**A.** Our preference is that you use business resources for business-related work. Incidental and occasional use of IT resources is acceptable where the cost and risk to Air New Zealand is negligible. Overall, business resources provided to you for work are not intended to be a replacement for personal resources. We ask that you use common sense and good judgement.

**Q.** Can I use my company credit card to pay for personal items, especially if I'm short on cash? I would pay it back to the Company, of course.

**A.** No. Never use a company credit card, or any company funds, to pay for personal items.

**Q.** I have access to company tickets to a sporting event that are being used for marketing promotions. Can I give them to a friend who works at a hotel in exchange for a free hotel room for my personal use?

**A.** No. The tickets are considered company property and cannot be used for personal gain.

# Travelling for Business

At times employees need to travel for work. As an airline we must balance the needs of commercial customers with our business travel requirements. When planning your trip, use your judgement to find the right balance between business need, environmental impact, financial cost and your health and safety.

**What this means for you:**

- **Only travel on business when there is a genuine need, where travel is authorised and pre-approved. Manager approval is required for domestic or intra-regional business travel; international travel requires additional GM approval (or Chief approval for GMs).**
- **Use the defined procedures to book travel (e.g. through Tandem Travel for international travel and your local travel arranger for domestic or regional travel) – never book your own business travel, including flights, accommodation and rental cars.**
- **Use preferred suppliers to help minimise the cost of travel.**
- **Only claim business expenses that are necessary and reasonable for your business travel. Use a company credit card for travel-related expenses whenever possible.**
- **Ensure you are medically fit for your planned travel and review safety protocols and security advisories for your destination – discuss any concerns with our Safety and Security teams.**
- **Personal travel is not be taken in conjunction with business-related travel.**
- **To reduce risk, executives, management groups or other key individuals should avoid travelling together.**
- **Maintain professionalism at all times – you are an ambassador for the airline.**

Air New Zealand honours any provision in employment agreements regarding duty travel, where it differs to policy.



**Q.** My travel costs into the office are expensive. Can I claim some of it back?

**A.** No. Normal travel to and from work can't be claimed as a travel expense – this cost is considered your responsibility and not a business expense.

**Q.** I travel regularly for business. Can I access the Koru Lounges when I'm travelling so I can work more productively?

**A.** Access to our Air New Zealand Lounges is for members only. If you personally have a membership, then you can use the lounge whenever you travel (we offer a discount to employees who purchase Koru memberships). Some roles require business travel so regularly that the Company purchases a Koru membership on their behalf. In these cases, where there is capacity, staff may access the Lounge.

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

**A.** No. Annual leave cannot be taken together with business travel. However, there are times when it is acceptable to add an off duty day, for example, a weekend to a planned business trip. Because of the potential conflict of interest, you must openly disclose your intent, gain approval from your GM, and ensure that there is no financial impact to Air New Zealand.





**We will communicate honestly, responsibly and with transparency with all stakeholders within the bounds of commercial confidentiality.**

## Speaking on Behalf of Air New Zealand

As a publicly-listed company we are bound by strict rules to ensure that publicly released information is appropriately disclosed and accurately reflects the Company's position. No one should make comments on behalf of Air New Zealand unless they are an authorised spokesperson or have prior approval from Corporate Communications. This includes when contributing to professional journals or presenting at industry association conferences.

### What this means for you:

- Only make comments on behalf of Air New Zealand if you are authorised to do so. This includes passing on to third parties information intended for internal use only.
- Direct any media enquiries or requests to the Corporate Communications team.
- Never disclose commercial or strategic information about the Company, our employees or our customers without permission, even after you leave Air New Zealand.
- Gain approval from your GM and have your content reviewed by our Corporate Communications team before contributing to professional journals or speaking engagements.
- Direct any investor or financial markets enquiries to our Investor Relations team.

**Q.** A local reporter has contacted me through a mutual friend to ask me about this year's Annual Report. Can I comment?

**A.** No. Only authorised spokespeople for Air New Zealand can provide comment to the media. You should put the reporter in touch with our Corporate Communications team on the 24 hour media line: (+64) 021 747 320. Leaks of company or confidential information to the media will be treated very seriously.

**Q.** I've been invited to speak at a professional conference in my area of expertise. Do I need permission to speak on behalf of Air New Zealand?

**A.** Yes. You need to gain approval from your GM before speaking at conferences. If you plan on using Air New Zealand material, Corporate Communications must review your content to protect against disclosing confidential, sensitive or proprietary information.







## Using Social Media

We recognise the importance and benefit of communicating through social media. We want to empower all our employees to be good ambassadors for our brand, but be mindful of what you post online as it could have unintended consequences.

Follow these general guidelines when using social media – both inside and outside of the Company:

- ✓ **Think before you post** – Remember that whatever you share may be public for an indefinite period of time (even if you attempt to delete it) and will be associated with you, your profile, and Air New Zealand.
- ✓ **Be truthful, accurate, and respectful** – Don't make statements that are false, misleading or unsubstantiated. Respect other people's views, even if you disagree and always be polite and courteous.
- ✓ **Use good judgement and common sense** – Don't post items that could reflect negatively on Air New Zealand or are legally protected (e.g. confidential or private in nature). Avoid topics that could be inflammatory or inappropriate, including personal work-related concerns or issues.
- ✓ **Do no harm** – Don't post material considered to be illegal, abusive, discriminatory, defamatory or offensive.



### What this means for you:

- **Separate your personal social media sites and accounts from work-related ones. Avoid using Air New Zealand sites to distribute personal communications and never use official company images on personal social media.**
- **Clearly show when posts or comments are your own views, not those of Air New Zealand, when you talk about work-related matters.**
- **Don't disclose information about others, misuse personal data or post photos without their knowledge and permission.**
- **Be mindful of copyrights, trademarks and intellectual property rights of others. Never post copyrighted material without the appropriate permissions (including published music, movies or video content).**
- **Honour any confidentiality and non-disclosure requirements, even on personal sites.**
- **Never post information about legal matters, including corporate transactions or investigations.**
- **For security reasons, never post details (including videos or photos) of any secure or restricted area, such as aircraft hangars or maintenance areas, runways, airline passenger areas, interiors of aircraft cabins, cockpits, under carriage, landing gear and baggage holding areas.**

**You are personally responsible and liable for anything you post online, whether speaking personally or in an official capacity for Air New Zealand.**

**Q. Am I allowed to say where I work on my social network profile?**

**A.** Yes. You can disclose on your 'About' page or bio that you are an Air New Zealander, which part of the organisation you represent and what your responsibilities are. You may include a link to the Air New Zealand website.

**Q. I have an issue with my manager and said so recently in my Facebook page. Was this wrong?**

**A.** Yes. You should discuss any issues or concerns you have about your job or work environment with your manager using the normal processes, rather than posting to social media sites.

**Q. On my last tour of duty, I took this great photo with a celebrity who was flying with us. Can I post it on social media?**

**A.** No. Even though taking and posting 'selfies' have become the norm, we must protect our customer's privacy and safety as a priority. Avoid asking customers for autographs, photos, or any favour that encroaches on their personal privacy. And never take or post photos of our passengers, or make comments about them on social media, unless it is with permission and authorised by Corporate Communications.

**Q. I saw a negative post on social media about Air New Zealand. Should I respond?**

**A.** No. As a general rule, avoid the temptation to respond directly to negative posts about the Company on social media unless you respond with approved messaging from Corporate Communications. Keep in mind that we have dedicated teams tasked with responding to customer enquiries or complaints. When in doubt, contact Corporate Communications.





**PROTECT  
OUR PEOPLE,  
PROPERTY AND  
INFORMATION**

# Financial Integrity

We expect all Air New Zealanders to be good stewards of company funds and spend responsibly. Our financial and accounting controls ensure we apply sound financial principles in our business transactions. Clear policies and strict guidelines are used in our financial planning, budgeting, monitoring and evaluation. We are all responsible for following our policies and legal, financial and accounting regulations. Our managers have an extra duty to ensure that their teams manage expenditure within budget and spend company money carefully (see Committing to Contracts and Expenditure for more information).

When assessing value for money, consider: quality, service, reliability, sustainability, compliance with our finance and procurement policies and any terms and conditions. Make sound investment decisions capable of being validated which are based on objective and economic criteria.

What this means for you:

- Understand the financial management responsibilities, policies and processes relevant to your role.
- Understand when you can and when you can't commit company funds.
- Strive to find the best value when spending company money.
- Only spend company funds on legitimate business needs.
- Keep expenditure within budget.
- Ensure your decisions are sound and based on objective information.
- Run transparent tendering processes for suppliers and business relationships.
- Report suspected misuse of company property or funds.

**Q.** I think my manager is claiming for expenses that aren't really business-related. What should I do?

**A.** You should speak to your HR manager about your concerns. Alternatively, use the Speak Up reporting line if you feel it's more appropriate.

**We will only spend company money where there is a legitimate business need and where the cost is worth the benefit. We will base our investment decisions and business relationships on economic criteria from objective and complete due diligence information.**

# Committing to Contracts and Expenditure

Air New Zealand is committed to sustainable procurement and supply chain decision-making. By managing our supply chain decisions centrally, we will minimise our impact on the physical environment, deliver optimal financial outcomes and enhance our competitive advantage. 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. Without these agreements, we are open to financial, commercial, tax and legal risk.

The Delegated Financial Authority (DFA) shows what level of authority you need before committing Air New Zealand to a contract or expense. Everyone is expected to understand how the DFA rules apply to their role.

What this means for you:

- Only commit to a contract or incur expenses where you are authorised and within your delegated limits.
- Use defined processes and approved suppliers when sourcing and purchasing goods and services.
- Obtain DFA approval for every purchase, requisition or order you make.
- Ask Purchasing if you're in doubt before ordering a product or service.

**Q.** Where do I find out the details of my Delegated Financial Authority?

**A.** Refer to the Delegated Financial Authority Policy on Korunet.

**Q.** Can I put a preferred supplier contract in place by myself?

**A.** No. All supplier contracts and agreements are managed centrally. Contact Purchasing, Business Performance for more information.

**Q.** Why does Purchasing need to approve suppliers before we can order from them?

**A.** We have a set of criteria used for approving suppliers that takes into consideration cost, environmental factors and purchasing power. This helps us meet our sustainability goals, mitigate risk of conflicting supplier commitments, provide more cost effective procurement and ensure the quality of goods and services.

**We will not commit to expenditure without appropriate authorisation. We will take into account social, ethical and environmental considerations in our procurement and supply chain decisions.**



# Accurate and Complete Information, Records, Reporting and Accounting

Honest, complete and accurate recording and reporting of information is critical to protecting our credibility, reputation and meeting our legal obligations. We are committed to ensuring our records are complete and accurately reflect transactions and events. This includes all forms of media (paper or electronic) and information, including financial, health, safety, personal or regulatory. We will properly manage the life cycle of our records and only retain them for the period of time necessary to meet our legal requirements and business needs.

We ensure our financial statements are reviewed by independent auditors and that we are completely open and transparent in our dealings with them as well as with our Internal Audit team.

**Q.** My manager asked me to record unconfirmed sales in the quarterly report to meet our targets. But the sale will not be completed until after the quarter ends. Should I do what they ask?

**A.** No. You must always record costs and revenues in the correct time period. Reporting a sale that is not yet complete would be a misrepresentation and may amount to fraud. Discuss it with your manager, or use the Speak Up line to report your concerns.

What this means for you:

- Record and report company information honestly, accurately and objectively, with reasonable detail and supporting documentation for all transactions.
- Never make false or misleading entries on (or inappropriately alter) company books, records or expense claims for any reason.
- Comply with the Company's system of internal controls.
- Be alert for unauthorised payments or invoices – ensure that no undisclosed or unrecorded or 'off the books' amount, fund or asset is established or maintained (see the Anti-money Laundering section for more information).
- Co-operate fully with Internal Audit, Group Finance and external auditors and provide them with accurate information and unrestricted access to necessary resources.
- Report any concerns or irregularities in accounting, auditing or internal controls.
- Understand and follow our data retention standards for creating, retaining and destroying company information.

Failure to keep accurate and complete records, falsifying information or creating misleading information could constitute fraud, with civil and criminal liability for Air New Zealand and individuals involved.

# Protecting Privacy and Confidentiality

We are committed to protecting confidential or personal information at all times, including that of our customers, employees and business partners. Personal information which can be used to identify someone must be handled responsibly and in compliance with all applicable privacy laws, and only collected for lawful and specific business purposes.

What this means for you:

- Classify personal information as confidential.
- Limit sharing or access to authorised people only, who have a clear business need for that information.
- Keep personal information no longer than necessary to accomplish the legitimate purposes (legal, regulatory or legitimate business need).
- Be aware of local privacy laws, especially when transferring personal information outside of its country of origin.
- Be objective when making written comments about people, as all personal information may be disclosed. Personal information, including your opinions, should be relevant, appropriate, accurate and justifiable.
- Take extra care when using electronic communications which contain personal information – ensure secure and protected systems are used.
- Return any unsolicited confidential information you receive to the sender or ensure it's deleted.

Refer to the Privacy Policy for additional guidance on the handling of personal data and a description of protected information.

**Q.** I have just received by accident an email with a file containing the salaries of several employees. Can I share it with other people at work?

**A.** No. You and your friends at work have no business reason to have this information. Delete the email and inform the sender of the mistake. Disclosing confidential and private information to other employees is a breach of the Code.

**Q.** I found a report on the photocopier that contains a lot of confidential records. I don't think it's right to leave this kind of information lying around for all to see. What should I do?

**A.** You should return the report in confidence to the owner if you know who it belongs to. Otherwise, put it in a secure bin for destruction. Report your discovery and actions to your Privacy Officer. This breach needs to be recorded in the Privacy Breaches Register. Whoever left the papers in the copier will be reminded of their duty to protect employee and customer data.

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

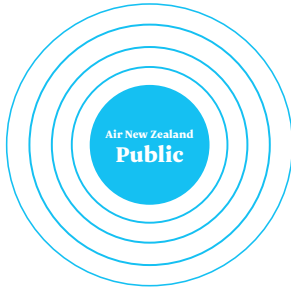
# Information Security

Information is one of our most valuable assets and we must safeguard our proprietary and confidential information at all times. We are responsible for determining whether the information is sensitive, who owns it and the appropriate level of protection it requires. Our security controls manage access to our information and networks to prevent improper disclosure. We limit access to the information to those who have a legitimate business need, following defined procedures.

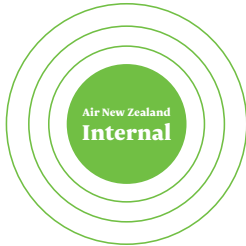


What this means for you:

- Classify information that you use for work



**Air New Zealand Public**  
Information we share with the public (which requires approval from our Corporate Communications team).



**Air New Zealand Internal**  
Day-to-day information that we share with colleagues and authorised third parties.



**Air New Zealand Sensitive**  
Personal, confidential or commercially sensitive information that will only be shared on a 'need-to-know' basis to those authorised.



**Air New Zealand Restricted**  
Critical information that could affect our share price.

- Protect your password
  - Don't share your password with anyone or write it down.
  - Never let other people access the internet using your internet account.
  - Don't let your computer 'remember' your passwords.
- Protect information and data at all times
  - Look after laptops, mobile devices and storage devices when you are not in the office – never leave your laptop unattended, or in the car visible to others.
  - Store classified information correctly and dispose of it securely when it's no longer needed.
  - Avoid leaving sensitive and confidential documents in meeting rooms, on your desk (lock away if necessary), or on printers (use 'secure printing').
  - Never save sensitive or confidential information on unauthorised systems or storage devices.
  - Lock your computer screen if you leave your computer unattended and switch off your computer at the end of the day.
  - Report incidents, breaches or lost laptops or mobile devices immediately to the IT Service Desk.
- Think before you click
  - Be careful when opening attachments from unknown addresses.
  - Only use authorised software and hardware.
  - Don't click links which may take you to unsafe websites.

**Q.** My manager told me when I travel with my laptop I should carry it on the plane with me. Is this necessary?

**A.** Yes. When travelling with a company laptop you must carry it on the plane with you. This protects the laptop and the confidential information contained on it from theft, loss, misuse or damage.

**Q.** I've given my password to our team administrator so they can process purchasing requisitions on my behalf. Is this ok?

**A.** No. Never share your password with anyone. And don't allow others to approve the use of company funds or assets on your behalf, especially if they don't have the correct level of authority themselves. Your nominee must go through a formal application and approval process to gain their own designated authority (for transparency and audit tracking purposes).

We will secure and safeguard our confidential and sensitive information from improper disclosure to prevent harm to Air New Zealand, our stakeholders, customers or employees who have trusted us with their information.



Our Code  
represents our  
commitment to  
do the right thing.





# Protecting and Respecting our Property

We are all encouraged to be creative and innovative. Our brand, designs, patents, trademarks, copyrights, trade secrets and know-how — our Intellectual Property (IP) — are valuable assets that we must safeguard. We must comply with applicable laws and regulations that help us protect our Intellectual Property from theft or misuse and in doing so, ensure it's available to us for future innovation. We all have a duty to protect Air New Zealand's confidential information.

## Other confidential business information that also comes under Intellectual Property includes:

- Sales, marketing and other company databases
- Marketing strategies and plans
- Research and technical data
- Business ideas, processes, proposals or strategies
- New product and/or package design and development
- Software bought or developed by the Company
- Information used in trading activities including pricing, marketing and customer strategies.

We must also respect the intellectual property rights of others. Never knowingly violate another company's intellectual property and always obtain the necessary licenses and permissions before copying, using or distributing it.

# We will protect and safeguard our brand, property, intellectual property and financial assets.

## What this means for you:

- Comply with our Brand Guidelines.
- Never allow any third party to use our brand or trademarks without first discussing it with Legal.
- Protect all confidential, proprietary or other IP information regardless of the method used (e.g. printed material, electronic files, email, verbal conversations), even after you leave Air New Zealand.
- Retain confidential or proprietary information or other IP in accordance with our Data Retention Policy and only share it with those who are authorised and have a business need to know the information.
- Use Confidentiality Agreements before disclosing confidential information to outside parties.
- Avoid disclosing any details of new products, designs, patents, trademarks or other confidential information or IP in public places, or with friends and family, or anyone not authorised to access it.
- Report any suspected misuse or theft of logos, trademarks or other Air New Zealand IP to Legal.
- Report any activities that infringe on the IP of others.
- Gain appropriate permissions before using the IP of others.
- Report any lost or stolen confidential information or other property immediately to Legal and Security.

Violations of IP laws can be costly. Discuss with your manager or Legal any questions or concerns about how to safeguard it.

**Q.** A former employee of Air New Zealand asked me for copies of materials we worked on together. Also, I discovered they already have a lot of printed and digital Air New Zealand material and data. What should I do?

**A.** Never give anyone outside the Company confidential information or IP. They have breached our Code by taking information with them when they left the Company, and there could be further issues if they use or reveal it to others. The obligation to secure confidential Air New Zealand information applies not only during but after employment. Discuss the situation with your manager and report it to Security and Legal. They will decide what action is needed to protect our information in this case.

**Q.** I'm not sure whether a design idea I've had might be worth something. Can I discuss it with our customers to get their views?

**A.** Initially, you should only discuss your idea with your team. Any idea, design, or new technique developed by you while working for the Company is considered the intellectual property of Air New Zealand and must be protected. If you want further guidance, discuss it with Legal.

Air New Zealand is the official airline of Middle-earth and marketing activity around the Hobbit has benefited New Zealand's tourism and economy.





**TREAT PEOPLE  
FAIRLY AND  
WITH RESPECT**

## Diversity and Inclusion

We strive to create a working environment where everyone feels respected and valued, and that reflects the diversity and characteristics of the communities in which we operate and the customers we serve. We recognise and celebrate the importance of diversity in our workplace. We will not tolerate any form of discrimination and we respect individuals and their human rights. We should all challenge discriminatory behaviour when we see it. We want everyone to feel empowered to raise any concerns.

**What this means for you:**

- Act fairly and show respect towards others in all your dealings.
- Actively seek, value and draw on the differing knowledge, perspectives, experience and styles present in our global community.
- Be aware of cultural sensitivities when working with others (employees or customers).
- Understand your responsibilities under the law regarding equal opportunity.
- Challenge discriminatory behaviour.
- Raise any concerns with your manager.
- Be inclusive in the language you use when communicating.
- Report any incidents that are inconsistent with our commitment to equal opportunity, inclusion and diversity.



**Q.** Who is responsible for delivering our commitment to having an inclusive and diverse workforce?

**A.** We must all take responsibility for treating people with professional courtesy, dignity and respect. This means valuing them as individuals as well as complying with specific laws and regulations where we operate. All employees are responsible for supporting our commitment to creating an environment where everyone feels valued and respected.

**We will treat people fairly, with dignity and will pursue equality of opportunity and inclusion for all employees through our employment policies and practices. We value diversity of people and thought.**

## Merit-based Recruitment and Selection

Our people are critical to our business. We are committed to attracting, developing and advancing the best people through a fair, merit-based process and ensuring the process is free from bias and discrimination. We will screen all employees and contractors before they are hired or engaged to help protect our people, assets, intellectual property and products. We will ensure those we hire have the qualifications and the experience required for their roles. We adhere to all employment regulations regarding staff, contractors and other complementary workforce (outsourced workers, agents).

**What this means for you:**

- Complete full and proper pre-employment and pre-engagement screenings as defined in our procedures.
- Base your decisions about recruitment, selection, development and advancement of employees on merit – their qualifications, demonstrated skills, and achievements.
- Comply with all applicable labour and employment laws.
- Seek advice if you have a concern – whether it concerns you, your direct reports or others.
- Report any breaches of law or this Code when you become aware of them, and co-operate with company investigations.
- Never allow race, colour, religion, gender, age, country of origin, sexual orientation, gender identity, marriage status, disability or any other characteristic protected by any applicable law to influence your judgement when it comes to the recruitment, selection, development or advancement of others.
- Expect others you work with (contractors, agents, joint ventures) to act in a way that is consistent with our fair treatment and equal opportunity standards.

**Q.** I have a vacancy in my team that isn't suitable for a single parent, as it involves a lot of travel. This is not about prejudice but practicality. Do I still have to interview single parent candidates out of courtesy?

**A.** You are obligated to interview all candidates whose qualifications meet the requirements of the job – not on the basis of personal opinion. Making assumptions like this violates our principles and may even be against the law. If we don't interview qualified candidates, we may miss the opportunity to appoint the best person for the job. At Air New Zealand, equal opportunity means equal opportunity for everyone.

**Q.** A colleague is recruiting a new team member. I'm concerned they may be discriminating against certain candidates. Should I challenge them?

**A.** You are right to raise your concern as we will not tolerate any form of discrimination. Urge your colleague to discuss the selection criteria with HR. If there is no change then you should raise the issues with your manager.

**We will recruit, select and develop our people on merit – irrespective of age, race, colour, origin, gender, religious beliefs or sexual preference or other protected characteristic.**



**We will not accept any form of discrimination, harassment or bullying.**

# Preventing Bullying and Harassment

We are all responsible for ensuring that harassment and bullying doesn't happen at Air New Zealand. Harassment and bullying can take many forms and have serious repercussions. Harassment includes language or conduct that may be derogatory, intimidating or offensive to others. Bullying and intimidating behaviour is repeated inappropriate behaviour that undermines someone's right to respect at work.

We may initiate disciplinary or legal action against people who harass or bully others. This includes suppliers, customers and other visitors to our premises.

## What this means for you:

- **Never be derogatory or abusive to or about others.**
- **Never behave in a way that is unwelcome, intimidating or offensive, including threats, bullying, inappropriate jokes or actions of a sexual nature.**
- **Discourage others from engaging in this behaviour.**
- **Make sure your communications abide by our Code no matter how informal you are being.**
- **Take all harassment and bullying complaints seriously. Managers should immediately address behaviour or conduct that may be offensive.**
- **Report and encourage others to report incidents of harassment, bullying or retaliation.**
- **Don't retaliate against anyone who makes a good faith complaint of harassment or bullying, or who co-operates in an investigation of a complaint.**

**Q.** I can see that one of my colleagues is being picked on constantly by other team members. I want to raise this but I'm concerned it might be my turn next. What should I do?

**A.** You should always challenge inappropriate or unacceptable behaviour. Speak to your manager or HR. If you don't feel comfortable doing this, then use the Speak Up reporting line.

**Q.** My manager mimics and makes jokes about a regular customer that speaks with an unusual accent. I think the jokes and comments are disrespectful and sets a bad example for the team. What should I do about it?

**A.** This behaviour is unacceptable. You could talk to your manager about your concerns, highlighting that this behaviour is inappropriate and not aligned with our commitments to supporting diversity and inclusion. You could also raise your concerns with your local Bullying and Harassment Contact Person, an HR business partner or report it through the Speak Up reporting line.

**Q.** I feel uncomfortable when my manager asks me out for drinks or makes remarks of a sexual nature when no one else is around. What should I do?

**A.** If you are not comfortable raising the issue with your manager, talk to a Bullying and Harassment Contact Person or to HR. You could also use the Speak Up reporting line to report your concerns.

# Ethical Business Practices of Suppliers

We engage with suppliers who share our commitment to sound, sustainable business principles and who operate in a safe and ethical manner.

## We are committed to doing business with suppliers who, as a minimum:

- Supply products that are manufactured in safe and healthy conditions.
- Operate in an ethical manner.
- Use voluntary workers (not indentured, forced or bonded labour of any kind), that are paid a proper wage under human conditions, are not discriminated against, exploited or subject to any kind of abuse, and work in conditions which are humane.
- Do not use child labour.

We will enforce the completion and review of inspection reports annually to ensure continued compliance with these requirements.

## What this means for you:

- **Do your due diligence before engaging a supplier or business partner on ethical conduct requirements.**
- **Challenge any unethical behaviour or business practice when you see it.**
- **Report any suspected issues of unethical business practices by suppliers to Legal or the Speak Up reporting line immediately.**

**We will not tolerate child labour and are committed to the elimination of all forms of forced and compulsory labour.**





**COMPLY  
WITH THE LAW**



# Anti-money Laundering

Organised crime and terrorism are global problems, with serious social, economic and political impacts for every country in the world, including New Zealand. Money laundering is the use of transactions by criminals, terrorists, or others to conceal the illegal source of their funds. We are committed to the highest standards of anti-money laundering compliance to prevent use of our products and services for money laundering purposes or for financing of terrorism.

What this means for you:

- Look for any suspicious transactions using cash payments or monetary instruments.
- Detect, manage and mitigate the risk of money laundering and the financing of terrorism using defined processes in your area.
- Follow all procedures, policies and controls used to detect and report money laundering or illegal financing activity.
- Complete comprehensive customer due diligence to verify their identity.
- Report any suspicious activity to Legal immediately.



We will comply with all applicable domestic and international laws and regulations, appropriate standards and principles, including all competition, anti-trust and anti-money laundering laws.

# Ensuring Continuous Disclosure

Air New Zealand is committed to the timely disclosure of all material information to its shareholders to promote investor confidence, and to meet our obligations as a listed company on the New Zealand and Australian Stock Exchanges under their Listing Rules. Material information means any information that a reasonable person would expect, if it were available to the general market, to have a material effect on Air New Zealand's share price. We will take all necessary steps to ensure that trades in our shares take place in an efficient and informed market.

‘Material information’ normally includes items such as:

- Revenue and earnings performance of Air New Zealand or its subsidiaries
- Shareholder issues and company control or ownership
- Major projects involving commitment of significant capital expenditure
- Actual or potential new routes, products, acquisitions or major service changes
- Actual or potential alliance negotiations and announcements
- Any commercial agreements with other airlines or businesses
- Bi-lateral and multi-lateral international air service agreements or related issues
- Government, agency, or regional and local authority lobbying
- Legal proceedings, industrial relations, negotiations and disputes
- Incidents involving safety, security and health
- Any other matter that is likely to impact the Company's reputation.

What this means for you:

- You aren't permitted to communicate any material information to anyone until adequate public disclosure is made.
- Our Disclosure Committee manages the Company's disclosure obligations and implements reporting processes, controls and guidelines for the release of information.
- If in doubt whether it is ‘material information’, don't communicate it and contact Legal for guidance.
- If you become aware of an issue that may be considered ‘material information’, record it on the Stock Exchange Disclosure Record form and send it to the Company Secretary immediately.

Harsh penalties exist for breaches of the Listing Rules and other applicable laws which may result in personal exposure to regulatory penalties, company liability and disciplinary action.

**We will not tolerate any form of bribery, including improper offers of payments or gifts to or from employees.**

# Eliminating Bribery, Corruption and Improper Payments

The law prohibits bribery in every kind of commercial setting. We are committed to meeting the highest ethical standards in the way we do business. Facilitation payments, or kickbacks, are examples of bribery and are illegal. Local ways of working are not an exception to these rules. Giving or receiving gifts or entertainment might also be bribery in certain circumstances, as many countries have stringent rules that prohibit giving anything of value to public officials to influence their actions. 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:**

- **Be cautious when giving or receiving gifts or entertainment, especially when a public official is involved (refer to the Gifts and Entertainment section for more information).**
- **Ensure that all gifts and entertainment are permitted by local law.**
- **Refuse to pay facilitation or other improper payments.**
- **Never make, offer to make, or authorise payment to a third party knowing that the payment will be offered or given to secure an improper advantage, obtain or retain business.**

**Q.** I am travelling overseas later this month and need to get a work visa quickly. The person processing my request at the embassy has said that they can speed up the process if I pay a small fee in cash. Is this OK?

**A.** No. This sounds like a facilitation payment, which is a form of bribery and is illegal. If this payment is a standard or official fee – such as part of a publically available fast-track service – then it is OK to proceed. However, even then you should consult Legal for advice first as you may be putting yourself and Air New Zealand at risk of legal action.

**Q.** A public health and safety inspector has arrived at our base. As an act of good will may I give them some Air New Zealand branded merchandise?

**A.** No. Never give anything of value to a government official without prior approval from Legal. Something that is considered a normal business courtesy in the commercial marketplace can, in the government marketplace, be construed as an attempt to improperly influence. 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.

# Avoiding Insider Trading

In most countries it is illegal for people to profit from insider trading. This involves trading securities or manipulating share prices based on 'inside information' – information that is not publicly available that we may have as a result of working for Air New Zealand and that is 'material' or could have an impact on the value of those shares or securities if it was made public. These rules apply regardless of how you acquire the inside information or whether you are aware of the sensitivity of the information and continue even after you stop working for Air New Zealand.

**What this means for you:**

- **Protect inside information from accidental disclosure.**
- **Never spread false information or engage in activities to manipulate the price of publicly listed securities.**
- **While having 'inside information', you are prohibited from directly or indirectly:**
  - trading securities of Air New Zealand
  - trading securities of any other publicly traded company
  - leaking, tipping off or otherwise passing inside information to third parties.
- **If you have questions or concerns about insider trading, contact Legal for more guidance.**

Securities include shares, options, debt, bonds, notes and other investments whose value is determined by the price of these shares. Insider trading can result in severe penalties including criminal liability, fines, and imprisonment.

Refer to the Ensuring Continuous Disclosure section for examples of 'material' information.

**Q.** A supplier told me about a new product in confidence. We can't use the product at Air New Zealand, but I think it has real potential and the shares will go up fast. Can I buy shares in the supplier's company?

**A.** No. You can't buy shares in the supplier's business until the information you have is publicly available. Currently you have 'inside information' which was given to you in confidence and has not been publicly disclosed.

**Q.** My friend is thinking about selling some Air New Zealand shares in the next few days. I know we are due to make an announcement that will have a positive impact on our share price. Is it ok if I drop hints to my friend to wait to sell?

**A.** No. You should never leak information about Air New Zealand's business which is not publicly available. Nor should you use inside information to influence the investment decisions of others.



## Competing Fairly

We make independent business decisions that are in our best commercial interests, compete fairly and comply with all applicable competition laws around the world. We believe in free competition and strive to outdo our competitors through honest and fair business practices. In our relationships with customers, suppliers and competitors, we never pursue any unfair advantages or misrepresent facts about our business. In addition, we avoid making false or misleading statements about our competitors. We collect competitor information in legally appropriate and ethical ways.

### What this means for you:

- **Never exchange sensitive information with competitors.**
- **Take care when dealing with competitors not to participate in any arrangement that could be construed as anti-competitive collusion.**
- **Never enter into anti-competitive agreements with competitors, such as price fixing, bid rigging, market allocation and agreements to restrict supply to another competitor.**
- **Never discuss costs, pricing or competitive bids with competitors or agree on who will win a competitive bid.**
- **Unless you obtain prior approval from Legal, don't:**
  - engage in benchmarking or other information exchanges or activities with competitors – use publicly available information instead,
  - begin any negotiations on mergers, acquisitions, joint ventures or similar transactions, especially if competitors are involved,
  - negotiate in joint activities with competitors to influence government action.
- **Never use trade associations or professional societies for contacts or communications with competitors that violate the law or company policy, such as discussions about price or other sensitive information.**
- **Never encourage customers, suppliers or former employees of competitors to provide information that they should keep confidential.**

Competition law violations can result in substantial fines for both Air New Zealand and those who violate it.

**Q.** I attended a sales meeting with other airlines, during the sales meeting I was asked what Air New Zealand's travel agency commission rates are likely to be for next year. Can I share this information?

**A.** No. This information is commercially sensitive and therefore cannot be shared with our competitors. If you did share this information, and other carriers independently matched our commission rates, your conversation could be viewed or perceived as an attempt to eliminate fair and open competition, which would violate competition and other antitrust laws.

**Q.** During a recent sales visit, a customer gave me a copy of my competitor's marketing strategy. Should I have accepted the information?

**A.** No. You must respect the intellectual property of others and avoid any inappropriate or illegal means of gathering information about competitors or customers. If you gain possession of competitor information that is marked confidential, or is believed to be confidential, consult with Legal immediately.

**Q.** I will be attending an industry association meeting next month and many of our competitors are also planning to attend. Would it be okay for me to ask our competitors about their new routes or products?

**A.** No. While industry association meetings and conferences do serve an important role in promoting information sharing, setting industry standards and discussing new developments, they also raise serious competition law concerns. As an attendee on behalf of the Company, you should avoid any discussion of routes, current or future pricing or statistical information, or attempts to stabilise the industry or encourage price uniformity. If you have any concerns, contact Legal.



# Administration of the Code

## Policy governance and administration

Air New Zealand's commitment to appropriate business and ethical conduct is supported by our strong corporate governance infrastructure. The Company uses a system of internal management controls that identify risks, issues and incidents, and takes appropriate corrective action where necessary. Our risk management process provides the framework for these internal controls, ensuring significant risks are escalated to appropriate levels of senior management.

Our Governance, Risk and Compliance team is accountable for administering the Code, managing the policy lifecycle and ensuring compliance with all policies, regulatory and legal obligations. Any substantive amendment to the Code or our policies will be approved through our formal policy review process.

## Agreement to abide by the Code

All Air New Zealanders must acknowledge that they've read, understood and agree to abide by the Code. We are required to do this when we are hired and to renew this commitment annually.

Please note that the Code is not a contract of employment, and Air New Zealand may interpret, modify or rescind some or all of the Code provisions, as well as related policies and standards, at any time.

## Consequences of non-compliance

Our Code represents our commitment to do the right thing, including respecting the rights of others. As an Air New Zealander, you agree to uphold this commitment. If you don't, you could put yourself, your colleagues and Air New Zealand at risk.

Our Just Culture philosophy of addressing risk focuses on open reporting, process improvement and prevention measures, rather than on blame or punitive action. However, reckless behaviour is a failure to follow this Code and is misconduct, which could result in disciplinary action and even dismissal. Breaches of law may also result in civil or criminal penalties.

# Living our Code

Because our Code covers so much detail and different situations, keeping everything in mind may seem daunting. But in any situation you're not sure of, just remember these key things and you'll be well on your way to living our Code of Conduct.

## Know our Principles

Make sure you understand our Business Principles, legal and company requirements that apply to your job – and always follow them.

## Decide what's RIGHT

Ask yourself:

- Is this aligned with our Business Principles and ethical behaviour?
- Are you acting with integrity?
- Who is this good for?
- Who could be harmed?
- What is the truth?
- Is this the right thing to do?

## Speak Up

Whatever your concern, don't wait until it becomes a serious problem. You can always:

- Talk it through with your manager
- Get in touch with someone in HR or the Governance, Risk and Compliance team
- Or use the Speak Up line to make a report



