

# Whistleblower

## Company Policy

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### Background and purpose

Auckland International Airport Limited ("**Auckland Airport**") is committed to supporting and protecting all persons working for, or on behalf of, or at Auckland Airport and others impacted by our work.

Auckland Airport's commitments to acting ethically by engaging in sound practices, respecting others and accepting responsibility for our behaviour, are set out in the Ethics and Code of Conduct Policy ("**Code of Conduct**"). This policy is applicable to any behaviour, or suspected behaviour, that violates our Code of Conduct.

Auckland Airport does not tolerate any form of wrongdoing and strongly encourages individuals to report any concerns they have about potential breaches of the Code of Conduct. The purpose of the Whistleblower Policy ("**the Policy**") is to communicate the principles for Whistleblowing at Auckland Airport and our commitment to protecting individuals who report their concerns.

### Scope

This policy applies to all individuals working for or on behalf of Auckland Airport in any capacity, including:

- current, former and temporary employees
- board of directors, and
- all persons working for, on behalf of, or at Auckland Airport, including (but not limited to) agency workers, volunteers, contractors, consultants, secondees and suppliers.

### Whistleblowing at Auckland Airport

At Auckland Airport you can report any concerns safely, and trust that your report will be handled appropriately. Concerns can relate to a variety of circumstances which may breach the Code of Conduct and could relate to a range of people including our employees, third parties, customers, suppliers or service providers.<sup>1</sup>

You can report suspected concerns through our whistleblower channels, you do not need to be certain that illegal, dishonest, or unfavourable behaviour has occurred to make a report. It is better to report your concerns so that they can be appropriately investigated.

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<sup>1</sup> Concerns may include 'serious wrongdoing' as defined in the [Protected Disclosures \(Protections of Whistleblowers\) Act 2022](#) (the Act).

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**Example of concerns that should be reported** *(but are not limited to):*

- dishonest activity, including accepting or offering a bribe, corruption, misuse of company resources, supplier fraud and undisclosed conflicts of interest
- illegal activity such as theft, substance abuse, violence, coercion, damaging property or other breaches of law
- conduct that is or may be a serious risk to the health, safety and wellbeing of people
- data privacy breaches or intellectual property theft
- sexual harassment or bullying
- contrary to Auckland Airports policies
- other serious wrongdoings

**Our whistleblower channels**

If your concerns relate to an emergency, always call 111 in the first instance. An emergency may include immediate threats to health and safety, such as injury, an accident, a violent incident, a hazard or damage to property.

You can report your concerns using Auckland Airport's whistleblower channels.

**Channel 1: Auckland Airport's Company Disclosure Officer**

- You can make a report in confidence to Auckland Airport's Company Disclosure Officer, (the Chief Corporate Services Officer), via email or by calling directly.

Company Disclosure Officer contact details	
Email address	<a href="mailto:whistleblower@aucklandairport.co.nz">whistleblower@aucklandairport.co.nz</a>
Phone	+64 220 151 400

**Channel 2: Independent Whistleblower Service**

- You can raise your concerns through our independently operated Whistleblower Service. The service is operated by a third party, PwC, and is available 24 hours a day, 7 days a week.<sup>2</sup> The service offers a secure and independent platform for reporting, allowing you to raise concerns anonymously, if you wish.
- You can make a report to the Independent Whistleblower Service using either of the following three confidential avenues.

<sup>2</sup> Note: Calls will not be taken on Christmas day.

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Independent Whistleblower Service - contact details	
Free phone line	0800 22 55 11 <i>(if dialing from overseas please use +64800 22 55 11. Please note the caller may incur a fee).</i>
Email address	<a href="mailto:Aklairport.whistleblower@pwc.com">Aklairport.whistleblower@pwc.com</a>
Webform	<a href="#">Auckland Airport Whistleblower form (pwc.co.nz)</a>

- You will be directed to an experienced PwC New Zealand staff member, and asked to provide details of your concerns (e.g. events, names of those involved, dates, any relevant documents, and any actions you have already taken).
- PwC will report the information to Auckland Airport’s Company Disclosure Officer, or appropriate senior Auckland Airport staff. If you decide to provide your contact details to PwC and remain anonymous to Auckland Airport, PwC may in future act as a conduit between you and Auckland Airport, enabling you to remain anonymous.

### Your protections

Auckland Airport will support you throughout the reporting process by providing you with the following protections.<sup>3</sup>

- Your identity will be kept **confidential**.<sup>4</sup>
- You will be protected from **civil and disciplinary** proceedings that might arise because of making the report.
- You will be protected from **retaliatory action or unfavourable treatment** by Auckland Airport.
- You will be protected by the **anti-victimisation** provisions set out in the [Human Rights Act 1993](#).

This applies even if you have spoken to another person about your concerns and/or if you are mistaken and/or if no reasonable grounds for the concerns are identified. To be protected, you must report your concerns in accordance with this Policy.

These protections do not apply if you provide information that you know to be false and/or have reported the concerns in bad faith (dishonest, misleading, or deceptive). Individuals who make reports which are found to be knowingly false and/or made in bad faith may be subject to disciplinary proceedings, up to and including dismissal.

<sup>3</sup> If the concerns reported are found to relate to “serious wrongdoing” as defined under the Protected Disclosures (Protection of Whistleblowers) Act 2022, then additional statutory protections apply.

<sup>4</sup> There are limited exceptions to this. If we consider that we have reasonable grounds to release the information, for either effective and appropriate investigation of the report or for preventing any serious health and/or safety risk to you or the public, then we may do so. These decisions aren’t made lightly, and we’ll let you know if we think it’s likely or possible that we will have to do this.

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## What happens next

Auckland Airport undertakes to consider and treat the same, any and all reports made. If your contact details are available to Auckland Airport, either directly, or via PwC, we will make best endeavours to do the following within 20 working days of receiving the disclosure:

- **Acknowledge** receipt of the report.
- **Consider** whether it warrants investigation.
- **Check** with you, whether you have made the report to anyone else.
- **Deal** with the concerns by investigating or deciding that no action is required.
  - Usually, it will be appropriate for the Company Disclosure Officer to inform any person who an allegation has been made against and give that person an opportunity to comment on the allegation, before further action is taken.
  - Depending on the nature of the report, the Company Disclosure Officer may refer the matter to the police or another appropriate authority.
- **Inform** you about what Auckland Airport has done about your concerns.

When it is impracticable to complete the above actions within 20 working days, Auckland Airport will commence the process, inform you of a timeframe within which it expects to deal with the concerns and keep you updated.

## Related Policies

Disclosure and Communications Policy  
Ethics and Code of Conduct Policy

## Related Legislation

[Protected Disclosures \(Protection of Whistleblowers\) Act 2022](#)

[Human Rights Act 1993](#)

[Modern Slavery Act \(Cth\) 2018](#)

[Privacy Act 2020](#)

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