

Whistleblower Company Policy

Purpose

Auckland International Airport Limited (“Company”) is committed to the principles and practices set out in the Protected Disclosures (Protection of Whistleblowers) Act 2022 (“Act”).

1 PURPOSE OF THE ACT

1.1 The purpose of the Act is to promote the public interest:

- (a) by facilitating the disclosure and investigation of matters of serious wrongdoing in or by an organisation; and
- (b) by protecting employees who, in accordance with the Act, make disclosures of information about serious wrongdoing in or by an organisation.

1.2 Employees who wish to disclose a serious wrongdoing may do so and be protected by the Act from any civil or criminal liability in respect of the disclosure, provided the employee acts in accordance with the Act and he or she reasonably believes the information to be true.

1.3 A serious wrongdoing is defined as any act or omission, or course of conduct in or by any organisation that is:

- (a) an offence;
- (b) a serious risk to public health, public safety, the health or safety of an individual, or the environment;
- (c) a serious risk to the maintenance of law including the prevention, investigation, and detection of offences or the right to a fair trial;
- (d) an unlawful, a corrupt, or an irregular use of public funds or public resources;
- (e) oppressive, unlawfully discriminatory, or grossly negligent, or that is gross mismanagement, and is done (or is an omission) by an employee or a person performing a function or duty or exercising a power on behalf of a public section organisation or the Government.

2 MAKING A DISCLOSURE

2.1 An employee wishing to make a disclosure must do so in accordance with this policy.

2.2 Any employee wishing to make a disclosure of serious wrongdoing by or within the Company should, in the first instance make the disclosure in confidence to the **Company Disclosure Officer (the Chief Corporate Services Officer)** via the whistleblower@aucklandairport.co.nz email address or by directly calling the Chief Corporate Services Officer. An employee may also make a disclosure directly to an appropriate authority.

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- 2.3 The Company Disclosure Officer will then investigate the matter to establish whether it has substance. Depending on the nature of the disclosure, the Company Disclosure Officer may refer the matter to the police or another appropriate authority. Generally, the Company Disclosure Officer will have 20 working days to consider and investigate the and inform the disclosure about what the Company Disclosure Office has done or is doing to deal with the matter.
- 2.4 Usually it will be appropriate for the Company Disclosure Officer to inform any person against whom an allegation has been made of the nature and substance of the allegation, and give that person an opportunity to comment on the allegation, before further action is taken.

3 CIRCUMSTANCES IN WHICH A DISCLOSURE MAY BE MADE TO SOMEONE OTHER THAN THE COMPANY DISCLOSURE OFFICER

- 3.1 A disclosure of information may be made to the Chief Executive or a Director of the Company if:
- (a) the employee making the disclosure believes on reasonable grounds that the Company Disclosure Officer is or may be involved in the serious wrongdoing alleged in the disclosure; or
 - (b) the employee making the disclosure believes on reasonable grounds that the Company Disclosure Officer is, by reason of any relationship or association with a person who is or may be involved in the serious wrongdoing alleged in the disclosure, not a person to whom it is appropriate to make the disclosure.
- 3.2 A disclosure of information may be made to an appropriate authority if the employee making the disclosure believes on reasonable grounds:
- (a) that the Chief Executive or the directors is or are or may be involved in the serious wrongdoing alleged in the disclosure; or
 - (b) the immediate reference to an appropriate authority is justified by reason of the urgency of the matter to which the disclosure relates, or some other exceptional circumstances; or
 - (c) that there has been no action or recommended action on the matter to which the disclosure relates within 20 working days after the date on which the disclosure was made.
- 3.3 Any employee who wishes to make a disclosure and finds the internal procedure inappropriate or difficult to follow should refer to and follow sections 7, 8, 9 and 10 as established in the Act. A copy of the Act can be obtained from the Legal Department.

If you have any questions about this policy you should direct them to the Company Disclosure Officer.

[Related Legislation](#)

Protected Disclosures (Protection of Whistleblowers) Act 2022

Privacy Act 2020

Human Rights Act 1993

Modern Slavery Act 2018 (Cth).

[Next Review](#)

June 2023

