CODE OF CONDUCT

To ensure that Airways and its employees maintain the highest standards of integrity, good conduct and concern for the public interest.
Document Management

Document Author, Owner and Approver

<table>
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<tr>
<th>Role</th>
<th>Name and Position</th>
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<tbody>
<tr>
<td>Document Author</td>
<td>Employment Relations Manager</td>
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<td>Document Approver</td>
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</tbody>
</table>

Document Review

This policy document is to be reviewed every two years.

This policy forms part of Airways CAA certification and may require Director of Civil Aviation approval for changes. When updating, please advise Head of Policy, Standards and Safety Improvement.
CONTENTS

DOCUMENT MANAGEMENT 2

1 WHY DO WE HAVE THIS POLICY? 4

2 WHO DOES THIS POLICY APPLY TO? 4

3 EXPECTATIONS OF BEHAVIOUR 4

3.1 OUR EMPLOYMENT RELATIONSHIP 4

3.2 EQUAL EMPLOYMENT OPPORTUNITY (EEO) 5

3.3 OUR VALUES 5

3.4 EXPECTATIONS OF BEHAVIOUR OVERVIEW 6

3.5 CUSTOMER RELATIONSHIPS 6

3.6 PERSONAL CONDUCT 6

3.7 RELATIONSHIPS WITH OTHERS 6

3.8 DEVELOPMENT AND PERFORMANCE OF DUTIES 7

3.9 HEALTH, WELLBEING AND SAFETY 7

3.10 HANDLING AIRWAYS PROPERTY AND INFORMATION 7

3.11 ACTIVITIES OUTSIDE WORK 8

4 WHEN EXPECTATIONS ARE NOT MET 8

4.1 GUIDELINES WHERE EXPECTATIONS OF PERFORMANCE OR CONDUCT ARE NOT MET 8

4.2 GUIDELINES IN CASES OF SERIOUS MISCONDUCT 8

4.3 OPERATIONAL SAFETY CONCERN 8

4.4 PROTECTED DISCLOSURES 9

4.5 YOUR RIGHTS 9

4.6 EXAMPLES OF MISCONDUCT 9

4.7 EXAMPLES OF SERIOUS MISCONDUCT 10

5 SUPPORTING PROCESSES OR DOCUMENTATION 11

6 RECORD AND QUALITY MANAGEMENT 11
1 WHY DO WE HAVE THIS POLICY?

To ensure that Airways and its employees maintain the highest standards of integrity, good conduct and concern for the public interest, by explaining what Airways expects of you and what you can expect from your employer.

To set the standard of behaviour which demonstrates our commitment to our values, each other and our work.

To set out expected behaviours and consequences for not meeting those expectations. Behaviour inconsistent with this Code of Conduct or other Airways policies is not acceptable and will result in action being taken including possible disciplinary action.

2 WHO DOES THIS POLICY APPLY TO?

This policy applies to all Airways employees within New Zealand and offshore. While this policy will not apply to those who are not employed by Airways, independent contractors, trainees and those engaged in work experience are expected to act in a way consistent with the principles contained in this Code of Conduct.

This Code of Conduct should be read together with other Airways policies which provide expectations of behaviour. This Code of Conduct may change from time to time. Your manager may also publish area-specific rules which cover the particular circumstances of your work situation.

3 EXPECTATIONS OF BEHAVIOUR

3.1 Our employment relationship

All Airways employees are responsible for:

- Behaving in a manner consistent with our Values and this Code;
- Demonstrating good faith in your dealings with Airways;
- Encouraging others to behave in a manner consistent with this Code; and
- Reporting behaviour that is inconsistent with this Code.

Airways and its managers are responsible for:

- Being a good employer;
- Demonstrating good faith in its dealings with you;
- Modelling the standards of behaviour detailed in this Code; and
- Applying this Code to address behaviour that appears inconsistent with this Code.
3.2 Equal Employment Opportunity (EEO)

Airways is an equal opportunity employer and is committed to equal opportunity in all aspects of employment. This means that:

- No employee or prospective employee should be disadvantaged or adversely affected because of sex, race, disability, marital status, family status, sexual preference, religious, political or ethical beliefs;
- Individuals will be assessed on the basis of skills, qualifications, work experience, abilities and attributes; and
- No employee should be subjected to harassment, bullying or discrimination in the workplace.

3.3 Our Values

Airways has developed a set of values that underpin the way we work and the way we behave. Our people are expected to behave in a way that demonstrates these values.
3.4 Expectations of behaviour overview

3.5 Customer relationships
Respect the rights and property of our customers; actively work to provide external and internal customers with excellent service and foster excellent customer relations at all times.

3.6 Personal conduct
- Actively demonstrate Airways values and abide by the Airways Code of Conduct and Airways policies.
- Be trustworthy, honest and fair. Behave in a way, both inside and outside of work, which does not negatively impact on Airways reputation or undermine your employment relationship with Airways.
- Respect Airways property and resources entrusted to you.
- Immediately inform your manager if you are charged or convicted with a criminal offence or any matter which is likely to impact on you holding or maintaining aviation security clearance.
- Be aware of the potential for and implications of conflicts of interest and act fairly and impartially.
- Act in a way, which does not damage or have the potential to damage Airways reputation.
- Ensure that any action carried out in the wider context of your association with Airways is not at odds with Airways values, your profession or the expectations of your role, which may include, for example using your position for personal or pecuniary advantage.

3.7 Relationships with others
- Respect other employees, their rights and property and do not interfere with their ability to carry out their duties.
Treat your colleagues, customers and any people with whom you have dealings in the course of your work with courtesy and respect, regardless of gender, age, ethnicity, cultural or professional background, religion or sexual orientation.

3.8 Development and performance of duties

- Carry out your duties in an efficient and competent manner and comply with Airways policies, values, standards and guidelines for the performance of your role.
- Take responsibility for your own development and actively participate in performance reviews, which are designed to support our people to develop and perform.
- Fully commit your time and energy to Airways work during work time.

3.9 Health, wellbeing and safety

- Contribute to and be proactive in contributing to a safe workplace by knowing and carrying out your responsibilities under health and safety legislation and under Airways Drug and Alcohol Policy.
- Ensure that you follow any reasonable instructions with regard to health and safety and use appropriate personal protection equipment.
- Ensure that you are not affected by substances such as drugs or alcohol when at work.

3.10 Handling Airways property and information

- Use all Airways property, equipment, information and systems for a proper purpose and in accordance with any Airways policy or rules governing the use of such property, equipment, information and systems.
- Not misuse, and maintain and protect the confidentiality of Airways confidential information.
- Confidential information can cover information about customers, staff, pricing, movements, manuals, financials, remuneration, technology, and services. It can be in any form, whether electronic, written or even verbal. Disclosure or misuse of confidential information not only has the ability to damage Airways, but could also impact on individual employees and customers. For that reason, Airways treats unauthorised disclosure or misuse of confidential information very seriously. Misuse of confidential information is generally:

1. Accessing or copying confidential information without authorisation;
2. Use of company information for personal or third party gain;
3. Use of information for any purpose other than that purpose for which the information was created, without authorisation; or
4. Disclosure or loss of confidential information through negligence.

- There are cases where Airways or individual employees may be required to disclose company information by law, such as under the Civil Aviation Act, the State Owned Enterprises Act, the Companies Act and the Official Information Act. This information should only be disclosed through the proper channels. Please ask your manager for guidance before any disclosure is made.
If you leave Airways for any reason, you are expected to continue protecting all Airways confidential information you still know of.

3.11 Activities outside work

- Not undertake any other work or activity which may give rise to a conflict of interest or interfere with the performance of your duties.
- Ensure that in the course of holding any position in a personal capacity (for example membership of an external club or association) you do not comment on Airways policies, customers or operations, unless expressly authorised and ensure that your activities do not adversely impact on your professional and employment obligations to Airways.

4 WHEN EXPECTATIONS ARE NOT MET

4.1 Guidelines where expectations of performance or conduct are not met

In the case of poor performance, misconduct or a breach of Airways policy that does not amount to serious misconduct, the following process will generally be followed:

1. Advice of the performance concern or alleged misconduct: you will be advised of the matter causing concern and you will be provided with an opportunity to respond and provide any explanation;
2. A formal warning: if appropriate, a formal warning may be given verbally by a manager and subsequently put in writing to you;
3. If there is no improvement in performance or further issues occur, a second formal warning may be given and provided in writing to you; or
4. If there is still no improvement in performance or a further issue occurs, you may be dismissed.

This is a guide only and does not prevent Airways from moving to any stage in the process should Airways deem it appropriate. Examples of misconduct and serious misconduct are listed in sections 4.6 and 4.7.

4.2 Guidelines in cases of serious misconduct

Behaviour which constitutes serious misconduct may result in suspension from duties (on pay) whilst the alleged offence is investigated; and/or may result in dismissal without notice (summary dismissal) without prior verbal and/or written warnings being issued.

4.3 Operational safety concern

Operational safety concerns identified under the provision of CAA's Rule Part 12 may be raised and dealt with under the Airways Just Culture Safety Concern Decision Chart for the Just Treatment of Individuals. A decision chart and explanatory notes are available on our intranet.

Where a performance deficiency is unable to be corrected, you cannot continue to perform the function to which the safety concern relates. Redeployment shall be considered in such cases. Where redeployment is not available or is not accepted, employment may be terminated.

The Just Culture process is designed to encourage openness and reporting of non-deliberate operational deficiencies. The Just Culture process sets out guidelines to apply in the case of a non-
deliberate operational performance deficiency. Where alleged conduct or performance involves an operational safety concern, Airways is committed to the just treatment of individuals under Airways Just Culture.

4.4 Protected disclosures
Airways will receive and deal with disclosures of “serious wrongdoing” in or by Airways in accordance with the Protected Disclosures Act and Airways Whistle Blower Policy. A serious wrongdoing includes any of the following types:

- an unlawful, corrupt, or irregular use of public funds or public resources; or
- an act, omission, or course of conduct that constitutes a serious risk to public health or public safety or the environment; or
- an act, omission, or course of conduct that constitutes a serious risk to the maintenance of law, including the prevention, investigation, and detection of offences and the right to a fair trial; or
- an act, omission, or course of conduct that constitutes an offence; or
- an act, omission, or course of conduct by a public official that is oppressive, improperly discriminatory, or grossly negligent, or that constitutes gross mismanagement.

4.5 Your rights
Where you have concerns about a performance, misconduct or serious misconduct process involving you, you are encouraged to take up the matter with your immediate manager (or, if this is felt to be inappropriate, a higher level of management or the People team). In many instances this will be all that is required to resolve the issue.

At each stage you may seek independent advice from a representative. A support person or representative may be involved at your request.

You have a right to take a personal grievance against Airways in accordance with the Employment Relations Act 2000. The Act contains a process for resolving employment relationship problems in an informal and speedy manner.

4.6 Examples of misconduct
The following acts or omissions are examples of misconduct, which may result in a warning, or ultimately dismissal:

1. Acting in a negligent or careless manner in the carrying out of duties;
2. Failure to observe safety, health or hygiene rules/instruction, which don’t reach the level of serious misconduct;
3. Failure to report any condition which may impact on your ability to properly perform your role;
4. Failure to exercise reasonable security measures in relation to company property, information or vehicles;
5. Misuse or damage to Airways property which do not constitute serious misconduct;
6. Frequent lateness or absenteeism;
7. Inappropriate and/or disruptive behaviour, that does not constitute serious misconduct;

8. Failure to work harmoniously and co-operatively with others;

9. Refusal to follow, disregard for or breaches of the Airways Drug and Alcohol policy or other Airways policy which are not classified as serious misconduct;

10. Any act or omission which, not being serious misconduct, has an impact on your ability to carry out the functions and duties of your position, or is likely to bring Airways into disrepute;

11. Any other act or omission which could reasonably be considered misconduct.

4.7 **Examples of serious misconduct**

The following behaviours are examples of serious misconduct, and may lead to instant dismissal without notice.

1. Refusal or failure to undertake the duties of a position held, or to carry out the lawful instruction(s) of a supervisor/manager;

2. Assaulting another person on Airways premises or while on Airways business;

3. Verbal abuse towards or any other behaviour which is likely to cause distress or offence to another person on Airways premises or while on Airways business;

4. Harassment, be it sexual, racial or personal (bullying) of, or unwelcome behaviour towards, customers, visitors or Airways employees;

5. Breach of Airways Drug and Alcohol Policy or a refusal to undergo a test in accordance with that policy;

6. Gambling while at work or on Airways premises;

7. Failure to report a work-related accident or incident or customer related complaint;

8. Falsification of documents;

9. Unauthorised possession, removal or use of Airways, another employee’s or customer property;

10. Failure to declare to Airways a conflict of interest;

11. Acting in a manner which brings Airways into disrepute; or a failure to act which brings it into disrepute;

12. Wilful or deliberate acts affecting quality or health and safety including disregard for quality or health or safety;

13. Misuse of, or blatant disregard for, the security of company credit cards, finances, security or identity cards;

14. Unauthorised accessing, copying, use, disclosure or misuse of confidential information;
15. Intentional misuse of time or resources, including unauthorised or improper use of computer systems or data;
16. Fraud or unethical actions. This includes, but is not limited to acts of bribery or corruption, professional misconduct or breach of professional code of conduct or ethics;
17. Wilful damage to company property;
18. Unauthorised absence from duty;
19. Negligence which results in loss to the employer, and/or affects the relationship of trust and confidence;
20. Breach of Airways policy that could reasonably be considered serious misconduct;
21. Any act of dishonesty;
22. Any other act or omission which could reasonably be considered serious misconduct.

5 SUPPORTING PROCESSES OR DOCUMENTATION

- Just Culture
- Airways values
- ANS expectations of behaviour

<table>
<thead>
<tr>
<th>Relevant policies</th>
<th>Using Technology Policy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Safety and Security policy</td>
<td></td>
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<tr>
<td>Bullying and Harassment policy</td>
<td>Purchasing Card Policy</td>
</tr>
<tr>
<td>Conflict of Interest Declarations and Disclosure of Relationships</td>
<td>Social Media Policy</td>
</tr>
<tr>
<td>Drug and Alcohol Policy</td>
<td>Whistle Blower Policy</td>
</tr>
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<td>Sensitive Expenditure, Gifts and Koha</td>
<td></td>
</tr>
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6 RECORD AND QUALITY MANAGEMENT

No records have been specified for retention under the Information Management Policy, NZ Archive General Disposal Authority or the Airways Retention & Disposal Authority, for the purposes of this policy, however some supporting processes may detail record keeping requirements.