The purpose of this policy is to establish systems to ensure Airways conducts its operations lawfully and responsibly in compliance with all applicable legislation.
**DOCUMENT MANAGEMENT**

**Document Author, Owner and Approver**

<table>
<thead>
<tr>
<th>Role</th>
<th>Name and Position</th>
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<tbody>
<tr>
<td>Document Author</td>
<td>Manager Legal Services and Company Secretary</td>
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<td>Document Owner</td>
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<td>Document Approver</td>
<td>Airways Executive Leadership Team</td>
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</table>

**Document Review**

This policy document is to be reviewed every two years.
1 WHY DO WE HAVE THIS POLICY?

Airways New Zealand (Airways) is a State Owned Enterprise and must be seen to set and maintain the highest standards of legislative compliance.

The purpose of this policy is to establish systems to ensure Airways conducts its operations lawfully and responsibly in compliance with all applicable legislation.

2 WHO DOES THIS POLICY APPLY TO?

This policy is applicable to all Airways employees.

3 POLICY

Airways:

► is committed to the highest standards of legislative compliance and to the development and maintenance of a compliance culture within the company;
► is committed to ensuring that sufficient resources are applied towards ensuring Airways’ compliance with applicable Legislation;
► has no tolerance for behaviours that compromise or may compromise Airways’ compliance with applicable Legislation; and
► supports the continuous review and improvement of its legislative compliance systems.

While the policies and procedures described below are to some extent directed at ensuring compliance with the specific Legislation set out in the Legislative Compliance Matrix:

► it is recognised that the Legislative Compliance Matrix does not represent an exhaustive list of applicable legislation; and
► Airways requires its employees to comply with all Legislation.

4 RESPONSIBILITIES

4.1 Legislation Owner responsibilities

Each Legislation Owner is responsible for ensuring systems and processes are in place to ensure company-wide compliance with any Legislation for which such person is listed as owner. This includes responsibility to:

► ensure all people within such person’s team receive any training reasonably required to ensure such compliance;
► make recommendations to other teams regarding steps required to ensure such compliance;
► promptly report to the Executive Leadership Team any material concerns or issues with legislative compliance in any area of the company;
► make recommendations to the Executive Leadership Team as to remedial action required in light of any material legislative breach; and
► implement any Executive Leadership Team or Board directives concerning compliance with relevant Legislation.
4.2 Manager Legal Services responsibilities
The Manager Legal Services is responsible for ensuring:

- The Legislative Compliance Matrix is promptly and regularly updated (at least annually) to reflect any material amendments to relevant Legislation since the last update, to add any new Legislation of material significance to Airways’ operations and to reflect any required changes in Legislation ownership;
- Obtaining the Executive Leadership Team’s approval of any Legislation to be added to the Legislative Compliance Matrix and of the proposed owner for such Legislation;
- Each Legislation Owner is promptly advised of material amendments or proposed amendments to any Legislation for which such person is listed as owner.

4.3 Head of Safety and Assurance responsibilities
The Head of Safety & Assurance is responsible for:

- Ensuring the implementation and maintenance of the compliance monitoring and reporting system outlined in section 5 below;
- In consultation with the Manager Legal Services, Legislation Owner(s) and/or Executive as appropriate, ensuring such system is regularly reviewed and updated to reflect any changes to Legislation; and
- Championing, coordinating and supporting employees through the compliance monitoring and reporting process.

4.4 All manager responsibilities
The implementation of sound systems of legislative compliance in accordance with any requirements or recommendations of the applicable Legislation Owner is the responsibility of all employees with management accountabilities. Managers need to demonstrate visible commitment to the effective operation of internal control systems and to be aware of their responsibility for ensuring compliance with applicable Legislation.

This involves:

- Assessing and minimising the risk of non-compliance; and
- Promoting employee awareness of relevant requirements.

4.5 All employee responsibilities
All employees have the responsibility to:

- comply with all Legislation relevant to their role within the company;
- promptly report any material concerns or issues with legislative compliance to the relevant Legislation Owner or to their manager (who shall in turn have responsibility to report the matter to the relevant Legislation Owner); and
- support the formal compliance monitoring and reporting process outlined in section 5 below (to the extent relevant to their role within the company). Such support includes (where relevant) the prompt completion of compliance surveys and prompt provision of required statements and other data necessary in connection with the process.
If any employee becomes aware of Legislation of material significance to Airways’ operations that is not included in the Legislative Compliance Matrix, s/he shall report such matter to the Manager Legal Services for consideration and possible inclusion in the Legislative Compliance Matrix.

4.6 Audit responsibilities
Audit is responsible for assessing the effectiveness of internal controls and advising areas for improvement when carrying out any audit of legislative compliance as per an agreed Audit Plan.

4.7 Outsourcing of compliance obligations
It is recognised that in some circumstances (e.g. complexity of applicable legal regime) it will be practical and cost effective to pass responsibility for compliance with applicable legislative compliance obligations to a third party. For example, a contractor or supplier might be contractually required to undertake services or provide a product in accordance with applicable law. Such outsourcing is an acceptable method of ensuring compliance provided:

▶ there are reasonable grounds to believe the third party is appropriately qualified to ensure compliance;
▶ there are reasonable procedures in place to ensure the third party is aware of, and complies with, their legislative compliance obligations (e.g. contract terms identify key obligations, work is supervised/inspected and/or certificate of compliance obtained upon completion etc.); and
▶ any ongoing compliance obligations (post-dating the third party’s involvement) are clearly identified and allocated to appropriate Airways personnel.

5 COMPLIANCE MONITORING AND REPORTING – COMPLYWITH

5.1 ComplyWith monitoring and reporting
To assist Legislation Owners to comply with their responsibilities set out above, Airways has implemented the ComplyWith Monitoring and Reporting system. This system is expected to operate as the principal means of identifying compliance levels and facilitating regular compliance reporting. However, it is not a substitute for each employee’s compliance with their responsibilities as outlined in this policy.

5.2 Compliance surveying and reporting procedures
Legislative compliance surveying and reporting shall proceed in accordance with the procedures and schedule described in the ComplyWith Process Design.

Each Legislation Owner must approve the content of any Executive or Board report required pursuant to the ComplyWith Process Design to the extent it relates to the Legislation owned by that owner.

Legislation Owners providing compliance statements for inclusion in any Executive Leadership Team or Board report are responsible for identifying all relevant legislative breaches or issues of which they are aware – not just those identified through the ComplyWith survey process. The recipient of a report prepared in accordance with the ComplyWith process design is entitled to assume that any Legislation Owner’s compliance statement is complete and that a Legislation Owner is not aware of any relevant legislative breaches/issues that are not disclosed in the report.
5.3 Changes to the ComplyWith Process Design

- The Executive Leadership Team must approve changes to the frequency of surveys and of the Executive Leadership Team and Board reports based on such surveys;
- The relevant Legislation Owner must approve changes to the survey questions (except those automatically occurring on the ComplyWith system as a result of legislative amendment) and to the number and identity of survey participants; and
- The Head of Safety & Assurance must approve all other changes.

5.4 Register of compliance issues

The Head of Safety & Assurance will maintain a register of potential legislative breaches identified through the compliance monitoring and reporting system outlined in section 5 and track progress with any required remedial action.

6 WHAT ARE THE SUPPORTING PROCESSES OR OTHER RELEVANT DOCUMENTS?

- Code of Conduct
- Legislative Compliance Matrix
- ComplyWith Process Design

7 DEFINITIONS

For the purposes of this policy, unless otherwise stated, the following definitions shall apply:

<table>
<thead>
<tr>
<th>Term or Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ComplyWith Process Design</td>
<td>The document setting out the ComplyWith process design including the content, participants and schedule for regular compliance surveys and the proposed format and schedule for regular Executive Leadership Team and Board compliance reporting (as amended from time to time in accordance with this policy).</td>
</tr>
<tr>
<td>Legislation Owner</td>
<td>The person listed as a Legislation owner in Legislative Compliance Matrix.</td>
</tr>
<tr>
<td>Legislation</td>
<td>All statute law and subordinate Legislation promulgated under such statutes (including regulations).</td>
</tr>
<tr>
<td>Legislative Compliance Matrix</td>
<td>Airways Legislative Compliance Matrix listing the Legislation of material significance to Airways operations and the owner of each piece of Legislation (as amended from time to time in accordance with this policy).</td>
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8 RECORD AND QUALITY MANAGEMENT

Under the Record Keeping Policy and Airways Retention & Disposal Schedule, the ComplyWith Report and associated responses should be retained for 10 years from last information entry date then transferred to Archives New Zealand.

- General Disposal Authority 6 c3.5.6: Employee Survey summary reports relating to Employees’ attitudes and concerns relating to Health and Safety
- General Disposal Authority 6 c7.1.1: Audit reports and responses to reviews/audits