

Code of Conduct

Ngā tikanga whanonga





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A message from Roger

He kōrero nā Roger

From the construction of Queen Street wharf in the 1850s until now, Auckland's port has connected the world to Tāmaki Makaurau. As New Zealand's largest import port, Port of Auckland has developed hand in hand with Auckland, bringing in goods we've needed to thrive.

From Singapore and Rotterdam, through to Sydney and Shanghai, thriving global cities depend on reliable supply chains. So, it's no coincidence these are just some of the powerhouse cities depending on port operations.

Our purpose is to facilitate the sustainable growth of trade for Auckland and the North Island.

Ports create jobs, they enable business, they reduce carbon emissions compared to other import options, and in the case of Auckland, the port provides a dividend to Auckland Council.

Most of the port's inbound cargo is for Auckland. We are proud of the role we play in Auckland's economy and how we support Aucklanders through our dividends.

Our vision: We are a port that is sustainably profitable, delivering a fair return to Auckland Council, whilst remaining the preferred port of our customers and people.

This Code of Conduct reflects the way we do things here, outlines the expectations we have of each other and how we work together.

It is important that you read, understand and act in agreement with this Code. I ask you to uphold this Code and encourage others to uphold it also. Speak up if you have any concerns or you feel someone has breached the Code.

Thanks



Roger Gray
Chief Executive Officer,
Port of Auckland





Port of Auckland
Tāmaki Herenga Waka

About the port

Mō te Tauranga Waka

Port of Auckland Ltd, Tāmaki Herenga Waka, plays a key role in Auckland, North Island and Pacific Island trade. Port of Auckland is the port for New Zealand's largest city. We have been playing a vital role in the Auckland economy for over 180 years, delivering things Aucklanders and New Zealanders need and enjoy. We are New Zealand's main port for car and container imports and New Zealand's main cruise hub.

The port has a rich history and is part of the special character of Auckland. We are the kaitiaki - guardians, of that legacy and our environment. Port of Auckland aim to be waste free by 2040 and emissions free by 2050.

Port of Auckland is owned by Auckland Council, but we operate independently. We are a profitable business, and our dividends are used by the Council to pay for things Aucklanders need. A port's main value, however, is that it facilitates a significant amount of economic activity.

About our Code of Conduct

Mō ā mātau tikanga whanonga

This Code of Conduct reflects the values and behaviours expected by those working at Port of Auckland, including direct Port of Auckland employees, contractors, subsidiaries and third parties.

The Code reflects our Port Behaviours and our policies. If you have questions about the right thing to do in any circumstance you are encouraged to seek further direction or help from the People and Culture team.

Our Code of Conduct is based on five key principles:



- 1 Comply with the law and regulations**
Me ū ki ngā ture
me ngā waeture
- 2 Always operate safely and responsibly**
Me haumarū, me tōtika
te mahi i ngā wā katoa
- 3 Treat people fairly and with respect**
Me manaaki, me
whakaaronui ki te tangata
- 4 Act with integrity**
Me pono te mahi
- 5 Protect our people, property and information**
Tiakina ō tāngata, ō rawa
me ngā mōhiohio

Port Behaviours

Ngā Whanonga o te Tauranga Waka

Our behaviours are what shape us as an organisation. They outline the expectations we have of each other and how we work together. Everyone who works at the port needs to read, understand and comply with this Code and its key principles.



Port Behaviours



Safety Always Haumarū

- > Always prioritises safety over productivity.
- > Actively demonstrates commitment to all safety expectations and responsibilities.



Respect & Care Whakaute me te manaaki

- > Demonstrates genuine concern for others, upholds other's mana and leads through relationships and influence.
- > Kaitiakitanga: champions actions that care for the physical environments POAL operations in.
- > Creates an environment where people can be themselves and feel they belong.
- > Builds trust by being approachable, by showing respect, and by fostering an inclusive, just and fair culture.
- > Maintains the spirit and confidence of the team.
- > Manages their emotions and demonstrates resilience.



Achievement Paetae

- > Sets clear goals, establishes strategies and operational plans, focusing effort on the customer and critical success factors.
- > Sets performance expectations and provides timely feedback on team and individual performance.
- > Holds themselves and team accountable for achievement of targets and celebrates successes.
- > Makes informed, data-driven decisions, reflects on progress, and makes course corrections as needed to achieve goals.



Work Together Mahi tahi

- > Encourages participation and leverages team expertise.
- > Builds collaborative relationships with team members and key stakeholders and seeks consensus on high-impact decisions.
- > Shares information early, transparently and avoids surprises.
- > Addresses people, productivity, safety, and sustainability tensions and resolves conflicts constructively.



Do Things Better Mahi pai ake

- > Embeds learning and improvement into the way the team works.
- > Challenges the status quo and champions change.
- > Builds capability by providing opportunities for stretch and grow.
- > Coaches team members to develop their skills and abilities.

1

Comply with the laws and regulations

Me ū ki ngā ture me ngā waeture

The port industry is highly regulated and we aim to comply with all applicable laws and requirements. We expect all employees to follow the laws, by-laws and regulations required by them as Port of Auckland employees and to be familiar with those requirements. This Code of Conduct does not cover or outline all laws and regulations.

As an employee you must:

- > Familiarise yourself with, and comply with all laws, rules and regulations
- > Familiarise yourself with, and comply with the Code and all Policies and Procedures
- > Comply with all disclosure requirements on a timely basis
- > Complete mandatory refresh training on obligations under the Code; and
- > Immediately report any non-compliance with the Code.

Additionally, if you are a people leader, you must also:

- > Enforce the Code consistently for all your employees
- > Prioritise our ethics over business objectives wherever there is a conflict
- > Support appropriate business conduct, ethical behaviours and compliance activities
- > Make sure appropriate controls are in place in your team
- > Never cover up or ignore any actual or potential 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 speaking up

- > Make sure that no one is treated unfairly as a result of speaking up; and
- > Deal with concerns when they are raised.

You are encouraged and expected to seek additional help if you have questions about a situation or the right course of action. Leaders, the People and Culture team and the Governance and Risk team are all available to help you if you need it.



Associated Policies

Legal and Regulatory Compliance Policy

2

Always operate safely and responsibly

Me haumarū, me tōtika te mahi i ngā wā katoa

We are committed to the safety and wellbeing of our people and take our responsibilities under the Health and Safety at Work Act 2015 seriously. We expect an equivalent commitment from all workers, PCBUs¹ and visitors.

As an employee you must:

- > Take reasonable care of your own health and safety and ensure that your actions don't cause harm to yourself and others
- > Comply with relevant legislation, regulations, and codes of practice, standards and safe operating procedures either statutory or established by our organisation
- > Use the appropriate personal protective equipment (PPE) and attend training that will help to work safely
- > Only smoke/vape in designated smoking areas
- > Report all work-related accidents and near-miss incidents
- > Follow emergency procedures; and
- > Cease work and seek assistance or advice if unclear about safe methods of work or conditions.

Drugs and Alcohol

Drugs and alcohol are recognised as potential hazards in the workplace. It is important all employees are fit for work and not impaired by drugs or alcohol.

You may be required to undertake drug and alcohol testing while at the port.

Drive and operate machinery safely

Port of Auckland is committed to road and vehicle safety. The use of vehicles is one of the greatest health and safety risk areas for the port, and it is important that people using vehicles within the port and on public roadways are aware of the risks and their responsibilities.

What this means for you is:

- > All laws and regulations must be followed when in and operating a port vehicle
- > You must be familiar with all relevant operating procedures and manuals
- > You must be in a fit state to drive
- > Be responsible and care for vehicles or machinery; and
- > Report any incidents, accidents or near misses.



Associated Policies

Safety and Wellbeing Policy, Drug and Alcohol Policy, Vehicle Use Policy, Smoke-free policy, Fatigue Policy.



Make your voice heard Whakaputahia ō whakaaro

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

Speak up

Whatever your concern, don't wait until it becomes a serious problem. We encourage everyone to raise concerns about conduct that may be unethical or illegal.

If you see behaviour at work that you feel may breach this Code, seems illegal or unethical, or is an abuse of our systems, processes or policies, you must report it, even if you only suspect it.

This could be bullying or harassment, potential conflicts of interest, danger to the health and safety of employees or customers, bribery, theft or fraud, price fixing or a breach of data privacy. For safety-related incidents or issues, continue to use our safety reporting process as a first priority.

How to speak up

We are committed to maintaining an environment in which our employees feel comfortable raising concerns about conduct that may be unethical or illegal. We are committed to protecting individuals who report concerns from retaliation or disadvantage. You can make an internal report by going to:

- > Your immediate manager or supervisor
- > Your Union Delegate or H&S Representative
- > The People and Culture Team
- > The Executive Leadership Team; and
- > Any member of the Audit and Risk Committee.

If you don't feel comfortable reporting your concerns internally, you can make an anonymous report through KPMG FairCall – an external independent party. You do this by:

- > Calling the toll-free hotline service on 0800 100 526. This line is monitored by trained and experienced KPMG professionals and is available on business days between 9am and 8pm. Outside of these hours you can leave a voice message and KPMG will return the call.
- > Emailing faircall@kpmg.com.au. KPMG will not provide POAL your email address, unless you allow them to.
- > Use the online reporting facility: www.kpmgfaircall.kpmg.com.au/POA.
- > Mailing a report, or additional information, to a secure mailbox at: The FairCall Manager
KPMG Forensic, PO Box H67
Australia Square
Sydney NSW 1213

While your report is anonymous, you will need to note it relates to Port of Auckland.

Protect our community

Drugs harm our whānau, our businesses, our communities and our way of life. If you see suspicious activity relating to illicit drugs, smuggling and other crimes, we expect you to speak up.

Your tip could help protect your community.

Customs appreciates all tips, take them seriously, and will act on them, which is why it's vital that the tips we receive are genuine. To report any suspicious activity you can: call 0800 WE PROTECT(0800 937 768) 24-hour confidential hotline.



Associated Policies

Code of Ethics, Speak Up Policy, Border Security Policy.



3

Treat people fairly and with respect

Me manaaki, me whakaaronui ki te tangata

The Port Behaviours set the expectations for how we act at Port of Auckland. A fundamental core behaviour we expect at the port is to treat others with respect and care.

Building a diverse and inclusive workplace

We are committed to ensuring that the unique strengths of individuals are respected and valued. We strive to provide an environment where people feel comfortable to be themselves.

What this means for you:

- > Act fairly and show respect towards others in all your dealings.
- > Actively seek, value and be mindful of cultural sensitivities and different perspectives present in our community.
- > Challenge discriminatory behaviour.
- > Be inclusive in the language you use when communicating.
- > Report any incidents that are inconsistent with our commitment to equal opportunity, inclusion and diversity.
- > Listen and treat others respectfully, regardless of union or non-union membership.

Preventing Bullying and Harassment

We are all responsible for ensuring that harassment and bullying doesn't happen at Port of Auckland. Harassment and bullying can take many forms and have serious repercussions.

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.
- > Always communicate in accordance with our Code no matter how informal you are being.

- > Report, and encourage others to report, incidents of harassment, sexual harassment, bullying or retaliation.
- > Take all harassment, sexual harassment and bullying complaints seriously. Managers should immediately address behaviour or conduct that may be offensive.
- > Don't retaliate against anyone who makes a good-faith complaint of harassment, sexual harassment or bullying, or who cooperates in an investigation of a complaint.

Associated Policies

Diversity, Equity and Inclusion Policy, Bullying and Harassment in the Workplace Policy.



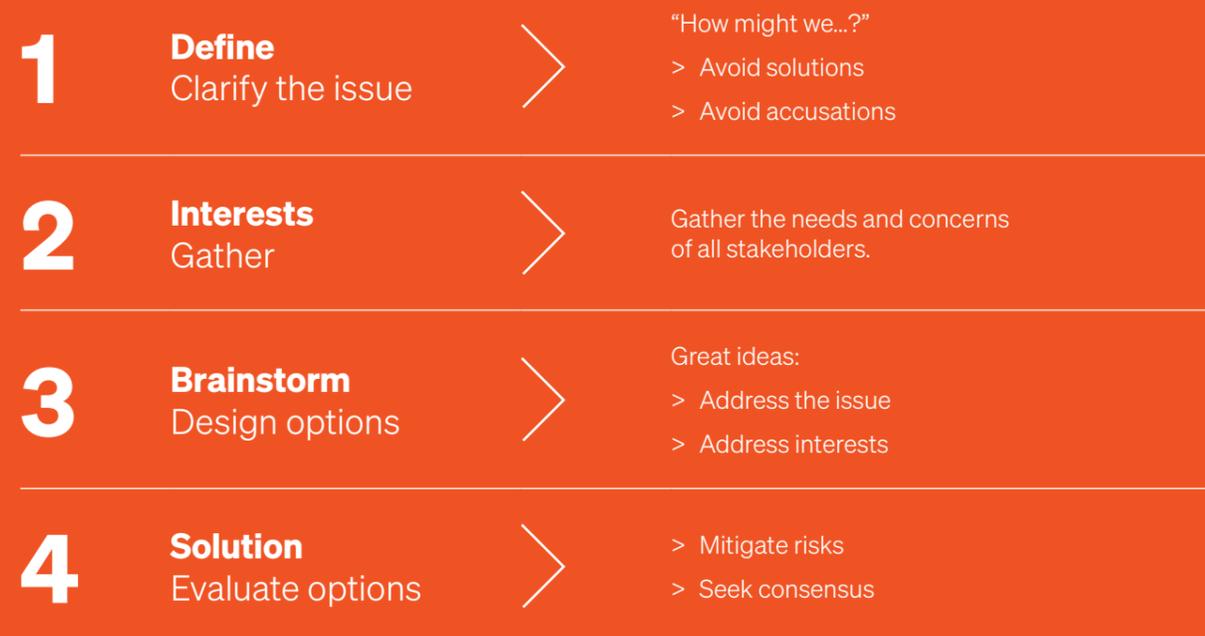


High performance, high engagement (HPHE)

Kia whakakoha te mahi tahi

At Port of Auckland we believe that employee voice is important, irrespective of non-union or union membership. We are committed to engaging with unions and employees through our HPHE framework.

Interest-based problem-solving: DIBS



HPHE brings whanaungatanga to life.

- > People closest to the problem help to define and solve the problem.
- > People impacted by change participate in designing the change.
- > Use interest-based problem solving (DIBS) as our process for collaboration.
- > Default to respectful engagement and collaboration.
We can disagree without being disagreeable.
- > Build trust through listening, transparency & consistency.
- > Seek consensus solutions whenever possible.

Testing for consensus

Can everyone actively support the decision, even if it was not their first choice?



For information and assistance

Contact Leadership & Culture
Look up <https://bit.ly/HPHE>

4

Act with integrity

Me pono te mahi

Port of Auckland expects staff to work and act with integrity. This means our stakeholders can trust us to keep our promises and do the right thing. Even when it's hard, we always follow applicable laws and regulations, and act with integrity.



Conflicts of interest

A conflict of interest arises when someone who has a responsibility to the port could be affected by some other interest, duty or relationship they have. A conflict of interest can be actual, potential or perceived.

You must not place yourself in a position where there is an actual conflict, or a substantial possibility of conflict. You should always act in the best interest of Port of Auckland. You must notify any conflicts of interest to the Governance and Risk Team.

Workplace relationships

The port supports the development of healthy and productive workplace relationships as a means of enhancing workplace satisfaction and a sense of wellbeing, which supports engagement and productivity.

From time-to-time workplace relationships can exist with family members, relatives, or partners. These relationships can result in complex workplace dynamics that require extra consideration to manage to ensure there is no negative impact on the business or individuals.

Should a romantic relationship develop between a manager and their direct report, the manager should make this known to their manager as soon as practical so the business can consider how this should be managed.

In situations where family relationships exist within same business units / teams / shift patterns, managers must take all practical steps to avoid allegations of unfair advantage or disadvantage based on the family relationship.

Remuneration

Port of Auckland has designed its remuneration policy to be fair and market competitive. The remuneration policy covers all Port employees not included in a Collective Agreement.

The port is an equal opportunities employer and remuneration is based on the skills, experience and performance of an individual and remuneration is not set based on demographic factors that have nothing to do with the ability of a person to do their job.

No wage or salary level is to be set below the official living wage as defined by Living Wage Aotearoa. The Remuneration Policy sets out how remuneration is managed.

Leave

It is important for health and wellbeing that employees take leave for rest and recreation purposes and managers are responsible for planning workloads and coverage.

The Leave Policy outlines leave entitlements for the following leave: annual leave, sick leave, parental and adoption leave, bereavement leave, long service leave, family violence leave, military service, jury service, fatigue leave, study leave, and leave when representing New Zealand. There are also guidelines on cashing up leave, leave in advance, leave without pay and opting for a fifth week of annual leave.

Border protection

You can play an important role in protecting New Zealand from cross-border crime, including drug smuggling. Be alert to the signs of cross-border crime and make sure you know how to report border activity that could harm yourself, others or our communities.

Receiving gifts and hospitality

We support reasonable and proportionate giving and receiving of gifts and entertainment as part of a normal business relationship or cultural practice. We prohibit the giving or receiving of significant gifts or benefits that may be seen as preferential treatment – these actions can create conflicts of interest or raise questions about our judgement.

Staff are required to avoid any situation which actions they take in an official capacity could be seen to be influenced by their private interests, or to create an actual or perceived obligation to another party.

You are required to register any gifts or hospitality with a value of \$200 or more through the gift and hospitality form. If there are concerns about the intention of the offer, regardless of its value, it should be registered.

Money, gift vouchers, stocks, shares and options, or gifts while in a process of procurement should not be accepted.

Associated Policies

Border Security Policy, Conflicts of Interest Policy, Delegated Authority Policy, Gift and Hospitality Policy, Procurement Policy, Remuneration Policy, Workplace Relationship Policy, Leave Policy, and Fraud Policy

5

Protect our people, property and information

Tiakina ō tāngata, ō rawa me ngā mōhiohio



Speaking on behalf of Port of Auckland

Media and stakeholders are often interested in Port of Auckland. Our objective is to handle all media enquiries professionally and in the best interests of the company.

All media enquiries including direct approaches to staff must be re-directed to a member of the Communications Team. All visitors wishing to access port property for the purpose of filming, photography and/or all other media activities must have prior approval from the Communications Team.

No drones are to be used on POAL property unless permission has been given.

Employees and contractors being interviewed by the news media in a private capacity must not suggest that they represent Port of Auckland or, through their private statements or actions, bring the port into disrepute.

Using Social Media

While we recognise freedom of speech, that doesn't entitle someone to defame or harass others online. When posting to social media the key is to avoid posting anything that could damage the company reputation or harm others.

Follow these general guidelines when using social media:

- > Think before you post
- > Be truthful, accurate, and respectful
- > Use good judgement and common sense
- > Do no harm

If you make a post or comment about the company, our service, staff, customers or contractors etc you must make it clear that any comments relating to our business and industry are your own views and opinions.

Once information is on a social networking site it is essentially public information. It should be assumed that it can be seen by anyone.

You must obtain the consent of your colleagues before posting online information, photographs, videos or similar that may identify them, to avoid potentially compromising their privacy or security. Even if you feel they are harmless, your colleagues may not agree.

Only people from the Communications Team can post from the port's social media profiles.

Sponsorship and Donations

The port supports selected events and organisations for the benefit of the community. The port may occasionally make donations to registered charities. No political donations are permitted.

Sponsorships and donations must be discussed with the Communications Team to ensure alignment with the port's sponsorship guidelines.

Travel

All work-related travel must be approved by the appropriate leader and must be booked via the approved travel coordinators. Travel expenditure must be economical and efficient and using the port's approved suppliers.

Expenses

The port will reimburse actual, reasonable and necessary expenses incurred in carrying out an employee's duties. Expenses must relate directly to our business and be within approved limits. Port issued credit cards are to be used only for business related expenses.

Financial Integrity

We expect everyone at the port to understand the financial management responsibilities relevant for their role and be responsible with company funds and resources. Our financial, accounting and procurement processes and controls ensure we apply good financial principles in our business transactions.

What this means for you is:

- > Understand the financial management responsibilities, policies and processes relevant to your role.
- > Ensure you understand how our Delegated Financial Authority works and applies to your role.
- > Only spend company funds on legitimate business needs. Spend responsibly and within budget.
- > Strive to get the best value when spending company money and base your decisions on sound and clear information.
- > Run transparent tendering processes for any suppliers and business relationships.
- > If in doubt, ask Procurement team for advice before ordering services or products.
- > Report any suspected misuse of company property, resources or funds.

Confidentiality and Data Protection

The Company's Code of Ethics requires all employees to maintain and protect the confidentiality of information entrusted to or generated by Port of Auckland.

The Port will not hold personal information for longer than is required for the purposes for which it may lawfully be used at which time it will be disposed of in a secure manner. For electronically held information refer to the Information Security Charter. Hard copy information must be shredded. Port of Auckland will not use personal information for any purpose other than the purpose for which it was collected unless authorised by the individual concerned.

Employees with access to private or confidential information must comply with the Privacy Act and the Port of Auckland privacy policy. Employees must complete cyber security training related to their role.

Accurate reporting and records

Accurate recording and reporting of information is critical to meet our business obligations and important to maintaining our credibility and reputation.

Failure to keep accurate and complete records if required by your role, falsifying information, or creating misleading information could constitute fraud. Always follow correct procedures, processes and governance requirements related to your role.

Use of mobile phones and tablets

A port issued mobile phone or tablet is a tool not a perk. The port will only issue devices to people where the use of a mobile device is reasonably necessary to do their job. Follow these general guidelines if you're issued a port device:

- > Take reasonable care and use appropriately
- > Don't alter device settings in a way that could compromise security
- > Maintain security
- > Report lost or stolen device as soon as possible

Associated Policies

Acceptable Use Policy, Digital Cyber Security Policy, Digital Password Safe Use Policy, Media Policy, Social Media Privacy Policy, Mobile phone and tablet Policy, Sponsorship and Donations Policy, Travel Policy, Expenses Policy.



Sustainability and looking after our environment

Te toitūtanga me te tiaki i te taiao

Our environment is important to us.
Our sustainability pillars are:



Caring for
Aucklanders



Genuine
Harbour
Health



Meaningful
Climate
Action



Driving towards
a circular
economy



Being a
sustainable
business in
Auckland

Port of Auckland aims to be waste free by 2040, zero emissions (category 1 & 2) by 2050. It will take all of us working together to meet these goals.

What this means for you:

- > Comply with applicable environmental laws and regulations – report any non-compliance with environmental laws and regulations.
- > Do your bit to reduce, recycle, reuse and be energy efficient in your work environment and support the port's environmental sustainability initiatives.

> 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.

Associated Policies

Environment and Sustainability Policy.



Compliance and consequences

Te tautuku me ngā mutunga iho

Our Code of Conduct represents our commitment to do the right thing, including respecting the rights of others. As a Port of Auckland employee, you agree to uphold this commitment.

Non-compliance with the Port of Auckland Code of Conduct could put yourself, your colleagues and the company at risk.

Port of Auckland is committed to a Just and Fair Culture. This 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 of Conduct and is misconduct, which could result in disciplinary action and even lead to dismissal. Breaches of law may also result in civil or criminal penalties.



Associated Policies

Disciplinary Policy.

Regular review and updates

Te arotake me ngā whakamārama auau

This Code of Conduct is not a contract of employment and will be regularly reviewed and updated to reflect changes in laws, regulations, and business practices.

We encourage employees to provide feedback and suggestions for improvement that can be incorporated in the review process.

This Code of Conduct was approved by the board in March 2024.



