



Code of Conduct Policy

Summary

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

Approver: Executive Leadership Team

Informed parties: All Airways people

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1 Why 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 Policy, or other Airways policies, is not acceptable and will result in action being taken, including possible disciplinary action.

2 Who this policy applies to

This policy applies to all Airways employees within New Zealand and offshore, temporary employees, and contractors (subject to contract terms).

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 policy.

This policy should be read together with other Airways policies, which provide expectations of behaviour. This policy may change from time to time. Your manager may also publish area-specific rules, which cover the 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 policy.
- ▶ Demonstrating good faith in your dealings with Airways.
- ▶ Encouraging others to behave in a manner consistent with this policy.
- ▶ Reporting behaviour that is inconsistent with this policy.

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 policy.
- ▶ Applying this policy to address behaviour that appears inconsistent with this policy.

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 based on 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.



**We are
safe**

Safety is at the forefront of everything we do. We are committed to the safety of our people, operations and the communities we serve.



**We strive for
excellence**

We deliver our best work each and every day, and look for ways to continue to improve what we do



**We are
One Airways**

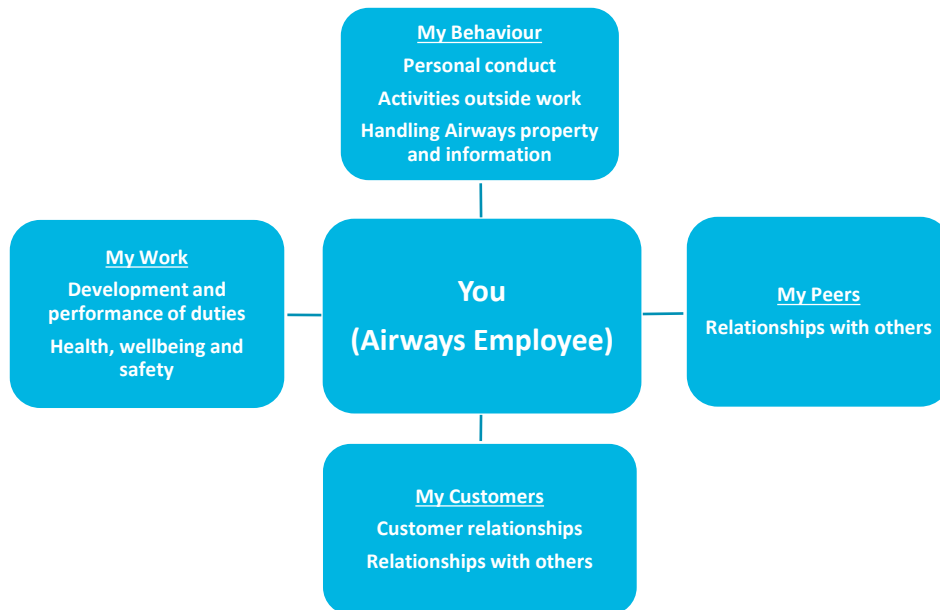
We all have our own areas of expertise and by working together, collaborating and sharing knowledge, we achieve our aspiration



**We celebrate
success**

We recognise our people's achievements, big and small, and celebrate our successes

3.4 Expectation 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.
- ▶ Foster excellent customer relations always.

3.6 Personal conduct

- ▶ Actively demonstrate Airways values and abide by the Code of Conduct Policy and other 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 report to your manager of any criminal charge or criminal offence.
- ▶ 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. For example, using your position for personal or pecuniary advantage.

3.7 Relationship 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.
- ▶ Ensure that you follow any reasonable instructions about 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 and complying with the Drug and Alcohol policy.

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.
- ▶ Maintain and protect the confidentiality of Airways' confidential information.
- ▶ Confidential information can cover information about customers, our people, 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 1990, the State-Owned Enterprises Act 1986, the Companies Act 1993, and the Official Information Act 1982. 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 while 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, serious misconduct or a breach of Airways policy, the following process will generally be followed:

- ▶ Advice of the performance concern or alleged misconduct/serious misconduct: you will be advised of the matter causing concern and you will be provided with an opportunity to respond and provide any explanation.
- ▶ An investigation (internal or external) into the allegation may occur depending upon the response.
- ▶ A formal warning: if appropriate, a formal warning may be given verbally by a manager and subsequently put in writing to you.
- ▶ If there is still no improvement in performance or a further issue occurs, you may be issued with a further warning or you may be dismissed.

This is a guide only and does not prevent Airways from moving to or repeating any stage in the process should Airways deem it appropriate. Examples of misconduct and serious misconduct are listed in sections 4.5 and 4.5.1.

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 Protected disclosures

Airways will receive and deal with disclosures of “serious wrongdoing” in or by Airways in accordance with the Protected Disclosures (Protection of Whistleblowers) Act 2022 and Airways’ Whistleblower 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.

If you wish to make a Protected Disclosure, you must do so in accordance with our Whistleblower Policy.

4.4 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 and Partnerships Group). 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. This Act contains a process for resolving employment relationship problems in an informal and speedy manner.

4.5 Misconduct is

1. A failure to observe safety, health or hygiene rules/instruction, which don't reach the level of serious misconduct.
2. A misuse or damage to Airways property which do not constitute serious misconduct.
3. A frequent lateness or absenteeism.
4. Inappropriate and/or disruptive behaviour, that does not constitute serious misconduct.
5. A 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.
6. 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.
7. Any other act or omission which could reasonably be considered misconduct.

4.5.1 Examples of serious misconduct

The following behaviours are examples of serious misconduct (not an exhaustive list) 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's property.
10. Failure to declare to Airways a conflict of interest. The existence of which could reasonably be said to affect the best interests of Airways.
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

Policies below can be found on the Policy Hub.

Safety and Security Policy	Acceptable Use of Technology Policy
Anti Bullying and Harassment policy	Purchasing Card Policy
Gifts and Koha Policy	Media and Social Media Policy
Drug and Alcohol Policy	Whistleblower Policy
Conflict of Interest Declarations and Disclosure of Relationships Policy	

6 Records 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 have detailed record keeping requirements.