

ONE AIR NEW ZEALAND — DOING WHAT'S RIGHT



Our Code of Conduct and Ethics



A MESSAGE FROM GREG

We are an iconic New Zealand business committed to enriching our country by connecting New Zealanders to each other and New Zealand to the world. Under **Kia Mau**, we each have a role in keeping our promise of **Manaaki** – taking care further than any other airline to our customers every day.

Let's all take pride in working for this uniquely Kiwi organisation and together commit to doing what's right.

Our Code of Conduct and Ethics reflects the way we do things here, and is a guide to how we should behave and for the daily decisions we make. Be honest, act with integrity, transparency and mutual respect.

It is absolutely essential that all Air New Zealanders read, understand and live by this Code. Apply the principles to the work you do every day and speak up if you have concerns about any behaviour you feel is in breach of this Code.

Ngā mihi,



Greg Foran
Chief Executive Officer



ABOUT OUR CODE OF CONDUCT AND ETHICS



The Code applies to all of us

The Code of Conduct and Ethics (the "Code") provides guidance on standards of integrity and business conduct. It doesn't attempt to address every situation that we might encounter.

Air New Zealand has specific policies and standards that apply globally, geographically or to certain divisions, functions or departments. Take the time to understand the policies that are referred to in this Code and how they apply to you in your role.

You are encouraged, and expected, to seek additional help whenever you have questions or are unsure about the right course of action. Managers, Human Resources and our Risk & Compliance team are available to help you if you need them.

What we expect of you

This Code brings together all of our policy principles to set out what we expect from every person working for, and with Air New Zealand, regardless of location – including our executives, employees, subsidiaries, directors, contract workers or agents who provide services on our behalf. We also expect our suppliers and business partners to uphold equally high standards, and abide by our Supplier Code of Conduct.

We need all Air New Zealanders to read, understand and live by this Code and it's 5 key principles

1. Treat people fairly and with respect in all your dealings

- Be kind. Treat your colleagues with dignity and respect.
- Do no harm. We do not tolerate any form of discrimination, harassment or bullying.

2. Operate safely, responsibly and reliably at all times

- Follow the health and safety procedures for your area.
- Only undertake work if you are medically fit for duty, sufficiently rested and alert enough to perform your duties.

3. Act with integrity, honesty and transparency

- Be vigilant about IT security.
- Use the business resources in a responsible and ethical manner. This is especially important if you are working from home.
- Be mindful of what you are sharing on social media. Only authorised spokespeople can speak to the media on behalf of our airline.

4. Protect our people, property and information

- Protect, sensitive, confidential and strategic information about Air New Zealand, our company, employees and customers at all times. Don't share with anyone without permission.
- Secure equipment and other property properly to prevent unauthorised use, damage or theft.
- Immediately report any lost property, security risks or unusual/suspicious activity to the Security team.
- Only use approved suppliers and agreed processes for finding and buying goods and services.
- Always stay within your delegated financial limits for any expenses or purchases and consider whether the expense is essential for the company's business.
- Respect individual privacy when accessing, using or sharing personal information – report any concerns to Privacyofficer@airnz.co.nz.

5. Comply with the Law

- Operate within all applicable laws, rules and regulations at all times.



Make a commitment to do what's RIGHT

When making a business decision or deciding what action to take, ask yourself:

- ?** • Is this aligned with our Business Principles?
- Is it dishonest?
- Is this legal and ethical?
- Does it comply with our policies and approved processes?
- Am I acting with integrity?
- Who is this good for?
- Could I explain or defend it if it appears in the media?
- Could I explain it to family, friends and colleagues?
- Could anyone be harmed?
- Is this the right thing to do?
- Could there be any possible unintended consequences?

If you are not comfortable with any of your answers above, DON'T do it.

If are still unsure, seek help by talking to your manager, HR Business Partner or the Risk & Compliance team.

Comply with the law

The airline industry is highly regulated by local government and the governments of other countries where we do business. Without exception, Air New Zealand aims to comply with all applicable laws, rules and regulations in the jurisdictions in which we operate, including export control, sanctions and customs, competition and anti-money laundering laws.

Our Code reinforces our commitment to both the letter and spirit of our legal requirements and our policies. It cannot cover all laws, regulations and other legal requirements of all jurisdictions we operate in.

Make sure you are familiar with the relevant laws and regulations that apply where you work. If there is a difference between a local legal requirement and our Code, apply the most stringent standard. If in any doubt, contact your manager or our Legal team.

Your Compliance Responsibilities

As an employee you must:

- Understand and comply with the Code
- Complete mandatory annual refresh training on their obligations under the Code; and
- Immediately report any non-compliance with the Code.

Additionally if you are a 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.
- Deal with concerns when they are raised.



Speak Up

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. Our Just Culture policy and procedures support a fair and confidential process.

Hold your colleagues accountable for behaving ethically and for following this Code. 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.

There are three ways to speak up:

- **Report it to your Manager**
It's not always easy to raise your concerns. We value open and honest communications, so you're encouraged to discuss any concerns with your manager.
- **Report it to your Human Resources team**
If it's not appropriate, or if you are not comfortable discussing the issue with your manager, you should discuss it with your HR Business Partner (ask your manager if you don't know who yours is).
- **Report it confidentially using the Speak Up line**
You may want to report your concern to someone who is independent from the situation. Search Speak Up on the intranet to find the phone numbers, or form to make a report online.

Our promise of non-retaliation

Air New Zealand has a non-retaliation policy when a genuine concern has been reported. This means that no action will be taken against you, and you will be protected against any form of harassment if you report concerns in good faith, even if proven not to result in a breach.



POLICIES COVERED:
JUST CULTURE AND REPORTING POLICY
RISK MANAGEMENT POLICY

OUR BUSINESS PRINCIPLES



Our Business Principles are at the heart of our Code of Conduct and Ethics.

They form the foundation of how our Company does business everywhere we operate, and reflect the commitments we make to our people, our business partners and stakeholders.



Our Business Principles apply to the Company as they apply to you. This is how the Company will apply the Principles.

1. Operate safely, responsibly and reliably

- We will protect the health, wellbeing, safety and security of our customers, employees and the communities in which we operate.
- We will not tolerate anyone being affected by alcohol or other drugs in the workplace.
- We will operate our business with discipline and excellence to ensure sustainability, resilience and effectiveness.
- We will protect and safeguard the natural environment (our Tiaki promise), minimising our use of finite resources and the release of harmful emissions to the environment.
- We will invest in society and communities ensuring effective use of our resources and in line with our mission.

- We will not tolerate any form of forced or compulsory labour, including human trafficking, slavery, torture, cruelty, inhuman or degrading treatment or other violation of human rights in any part of our business or in our supply chain.
- We will avoid any activity or contracts that may lead to, or suggest, a conflict of interest between personal activities and Air New Zealand.
- We will build trust through integrity, transparency, honesty and objectivity in our business dealings and relationships.
- We will use business resources in the best interest of Air New Zealand and not for personal gain.
- We will communicate honestly, responsibly and transparently with all stakeholders within the bounds of commercial confidentiality.

3. Protect our people, property and information

- We will base our investment decisions and business relationships on economic criteria from objective and complete due diligence information.
- We will not commit to expenditure without appropriate authorisation.

2. Act with integrity, honesty and transparency

- We will conduct our business with proper regard for ethical business practices in all communities in which we operate.

- We will only spend company money where there is a legitimate business need and where the cost is worth the benefit.
- We will take into account social, ethical and environmental considerations in our procurement and supply chain decisions.
- We will secure and safeguard our confidential and sensitive information from improper disclosure to prevent harm to Air New Zealand, our stakeholders, employees or customers who have trusted us with their information.
- We will protect and safeguard our brand, property, intellectual property and financial assets.
- We will respect people's legal rights to privacy and the confidentiality of personal information.

4. Treat people fairly and with respect

- We will not accept any form of discrimination, harassment or bullying.
- We will treat people fairly, with dignity and will pursue equality of opportunity and inclusion for all employees through our employment policies and practices.
- We value diversity of people and thought.
- We will recruit, select and develop our people on merit – irrespective of age, race, colour, origin, gender, religious beliefs, disability, family or marital status, sexual orientation or other prohibited grounds.
- We will perform at our best, demonstrating professionalism, living our values and operating with acute customer focus at all times. We will proactively address under-performance.
- We will work in good faith, within the appropriate legal framework, with trade unions and other bodies that our people collectively choose to represent them.

- We trust each other to deliver on our commitments and obligations, and value collaboration as the best means of working together to achieve superior outcomes.
- We will empower our people to enhance their personal potential by offering satisfying and challenging work and career opportunities, investing in development and personal growth.
- We will reward and recognise our people for work which contributes to our mission to supercharge New Zealand's success, and for demonstrating the right behaviours that reflect our values.
- We will respect people's lives outside of work, balancing life activities, and valuing their contribution to society.
- We will not tolerate child labour and are committed to the elimination of all forms of forced and compulsory labour.

5. Comply with the Law

- We will comply with all applicable domestic and international laws and regulations, appropriate standards and principles, including all export control, sanctions and customs, competition, and anti-money laundering laws in the jurisdictions in which we operate.
- We will not tolerate any form of bribery, including improper offers of payments or gifts to or from employees.





1. OPERATE SAFELY, RESPONSIBLY AND RELIABLY

Safety

Safety at Air New Zealand is a top priority. We are committed to achieving a Zero Harm work environment and a culture of safety and continuous improvement to protect our people, customers and communities in which we operate. It is vital that we maintain occupational health and help stop the spread of COVID-19.

What this means for you:

- You are responsible for your own safety and wellbeing, and the safety of your colleagues and our customers.
- Comply with applicable safety laws and follow the safety procedures and requirements specific for your area. This includes vigilantly following workplace guidelines and recommended practices on vaccines, masks and testing.
- Never compromise on safety or knowingly create situations where the safety and wellbeing of any person is put at risk. Intervene where you see unsafe practices or non-compliance with procedures.
- Only undertake work if you are medically fit for duty, sufficiently rested and alert.
- If injured, ensure you do all you can in your recovery and rehabilitation for a safe and timely return to work.
- Prevention is critical – identify and report any hazards.
- Report safety and wellbeing concerns, no matter how small, including any near miss, incident, accident, injury, illness, unsafe or unhealthy condition.
- Always drive safely, responsibly and legally when operating company vehicles.
- Limit using mobile devices in the workplace to maintain your attention to safety. Never use handheld mobile devices while driving.

Avoiding Alcohol and Other Drugs

Alcohol and other drugs must never affect us in our work. Our safety, and that of our colleagues and customers, depend on it. Any possession, use, sale or distribution of illegal substances at work will be treated very seriously. Air New Zealand provides support to those affected by problems with alcohol or other drugs.

What this means for you:

- Never work, under any circumstances, while affected by alcohol or any other drug that impairs judgement, performance or behaviour. Be drug free and maintain a zero blood alcohol level while working. This includes being free from the negative effects of legal drugs, such as prescription medication.
- Never drive a vehicle used for business purposes if you aren't drug and alcohol free.
- Don't store or consume alcohol on our premises unless it's authorised (e.g. sponsored and supervised functions on our premises).
- Don't use, sell, distribute or be in possession of alcohol or other drugs while working or while on our premises.
- Discuss with the Medical team prescription medication or other legal drugs which may impair your ability to work.
- Report in confidence any concerns you have about your own use, or a colleague's use, of alcohol or other drugs to our Medical team.
- You may be required to undergo alcohol and other drug testing for safety sensitive roles or where there is cause.

POLICIES COVERED:
[PEOPLE HEALTH SAFETY AND WELLBEING POLICY](#)
[AIRLINE SAFETY POLICY](#)
[ACCEPTABLE USE OF BUSINESS RESOURCES POLICY AND SUPPORTING STANDARDS](#)

Crisis, Emergency and Business Disruption Management

Crisis, emergency and business disruption management is important to protect our people and reduce any damage or loss. Effective crisis, emergency and business disruption planning helps minimise damage and impact to the Company, and keeps our operations going after any disaster.

What this means for you:

- Know your individual responsibilities and local emergency contact details.
- Help develop and implement crisis, emergency and business disruption plans for your business area as requested – test these to improve response preparedness.
- Debrief following an event to ensure lessons are learned and actioned.
- Follow crisis, emergency and business disruption procedures.
- Continually assess risks and threats that may impact your business area.



Airline Security

Global security remains volatile and we must take our safety and security seriously. We must all have a high level of security awareness and consistently apply appropriate security measures to protect our customers, employees, assets, premises and property.

What this means for you:

- Always wear your security ID in secure areas so it is visible to others – make sure it's current, accurate and valid for the area in which you work.
- Immediately report to our Security team any actual or perceived security risks, weaknesses, threats, or unusual or suspicious activity or behaviour.
- Vigilantly adhere to safety and security protocol, standards and practices at all times, and follow requirements for your area.
- Only bring unauthorised individuals into secure areas after appropriate security checks and authorisation. Always escort your visitors while they are on the premises – never leave them alone in secure areas.
- Store equipment and other property securely to prevent unauthorised use or theft.
- Report any loss of property including security ID cards, Air New Zealand uniforms or branded work wear straight away, to local police and our Security team.
- Read travel advisories and security tips before travelling overseas for business.

Refer to the [Information Security section for protecting and securing data and information.](#)

Sponsorship, Grants and Donations

As New Zealand's national carrier, we are committed to keeping our Tiaki promise. By properly managing our grants, sponsorships and donations, we protect Air New Zealand's reputation with all stakeholders.

What this means for you:

- Ensure all sponsorships or donations are appropriately authorised.
- Ensure that your personal fundraising activity is not construed by the public as being endorsed by, or on behalf of Air New Zealand.
- Never request sponsorships or use company money to make charitable donations, to close deals, seek favours from decision makers, support illegal activity or for personal gain.
- Question any charitable donation or sponsorship that gives rise to any actual or perceived conflict of interest.

Environment Sustainability

We are committed to preserving and protecting New Zealand's natural environment for the future by operating in an environmentally sustainable way and improving our energy performance.

What this means for you:

- Comply with applicable environmental laws and regulations – report any non-compliance with environmental laws and regulations to your Property and Facilities Manager.
- Do your bit to reduce, recycle, reuse and be energy efficient in your work environment and support the Company'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.



2. ACT WITH INTEGRITY, HONESTY AND TRANSPARENCY

Ethical Behaviours

Our ethics set standards of conduct and guide us on what is the right thing to do when making business decisions or entering into commitments. You can put your ethical dilemmas through the following tests to see if they bring up any red flags.

- Even if it's legal, is it the right thing to do?
- Who could be harmed?
- Does it involve any kind of dishonesty?
- Will you be forced to rationalise it to justify your action?
- Are there any possible unintended consequences?

Escalate to the Executive any contract or project which you think may involve potentially unethical activities or sensitive industries e.g. concerns around human trafficking, child labour, mining, nuclear, biological or chemical weapons.

Human Rights Protection

As part of our commitment to our communities expressed in our [Slavery and Human Trafficking Position Statement](#), we will not tolerate any form of forced or compulsory labour, including human trafficking, slavery, torture, cruelty, inhuman or degrading treatment or other violation of human rights in any part of our business or in our supply chain.

If you are faced with an ethical dilemma or have identified a red flag, seek guidance from the Risk and Compliance team or the General Counsel and Company Secretary.

Be Free of Conflicts of Interest

A conflict of interest can happen if an employee's personal, social, financial or political activities interfere (or could be seen to interfere) with their judgement at work. Whenever possible, conflicts of interest should be avoided – even the appearance of a conflict of interest can be harmful.

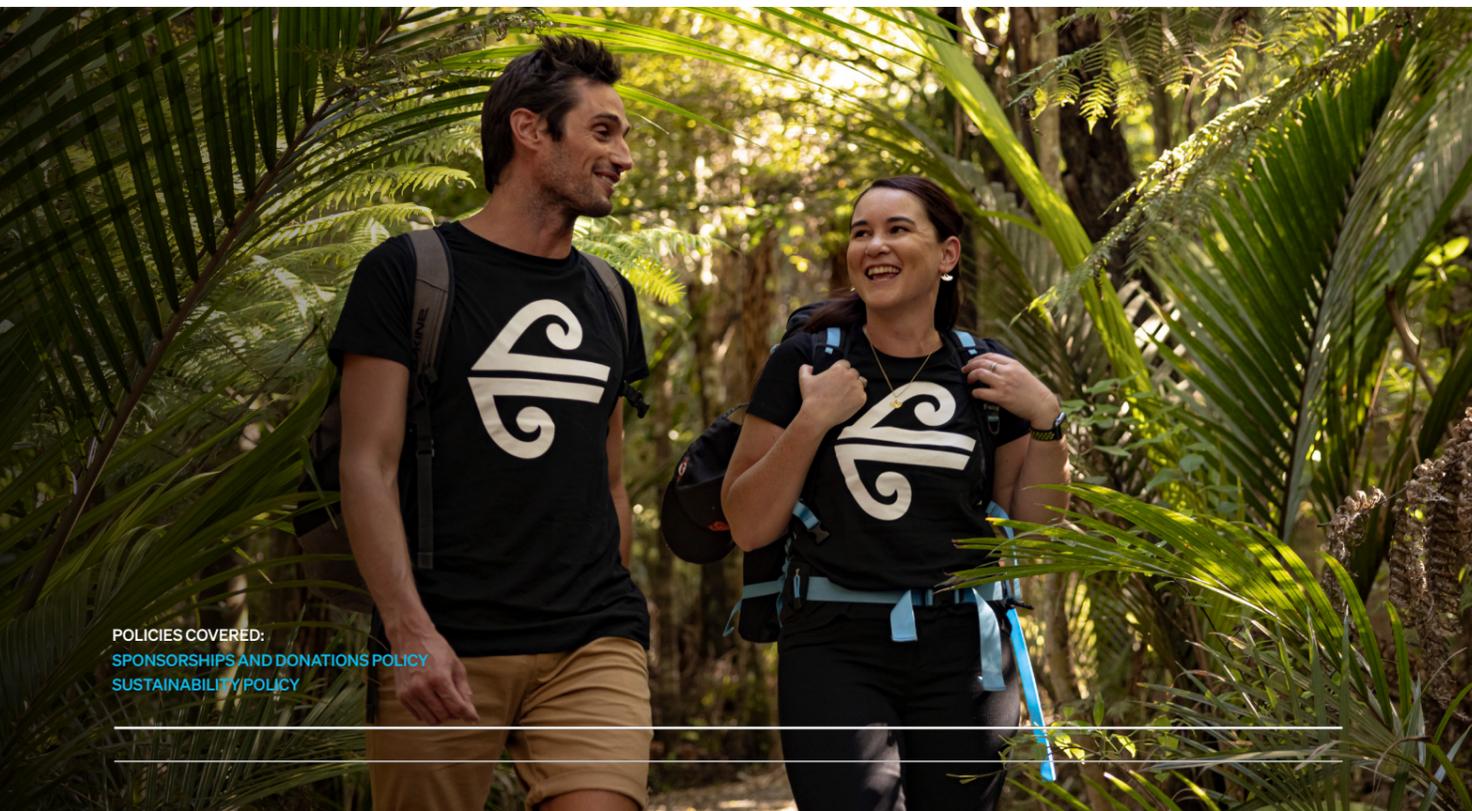
What this means for you:

- Act in Air New Zealand's best interest and make objective decisions.
- Remove yourself from business decisions or activities where you have a personal interest.
- Discuss conflict of interest concerns with your manager and disclose them on the Conflicts of Interest Register.

- Remove yourself from decisions involving hiring, supervising, managing, promoting, rewarding, or advancing any relative, close friend or partner.
- Never influence the terms and conditions of a contract for service, or for employment, of any employee, contractor or supplier who is a relative, close friend or partner.
- Exercise care when providing travel services to relatives, friends or co-workers. Providing preferential treatment to them such as unauthorised deviations from established rules for pricing, issuing, exchanging or refunding tickets, inappropriate upgrades, improperly withholding seats from inventory or blocking space and ignoring boarding priorities is not allowed.
- Avoid working or consulting for, or providing professional services to, anyone external that you deal with as part of your job at Air New Zealand.

POLICIES COVERED:
CONFLICT OF INTEREST POLICY

POLICIES COVERED:
SPONSORSHIPS AND DONATIONS POLICY
SUSTAINABILITY POLICY



- Never use business resources for personal political activity, make political donations or endorse any candidate, campaign or political issue in Air New Zealand's name.
- Never provide sensitive or confidential information to a competitor or third party, including friends or relatives.
- Never knowingly maintain substantial financial interests or investments in a competitor, customer or supplier without disclosing them.
- A relative or close personal friend cannot have any business dealings with you, anyone who reports to you (direct report), or anyone working in your business unit (indirect report).
- Outside activities should not interfere or conflict with your job responsibilities. This includes selling goods or services for personal profit during work time or using your employment at Air New Zealand as an endorsement for personal business.

See our Subsidiary Directorships Policy and Industry Associations Policy for information on the invitations for directorships within the Air New Zealand Group or for Group representation on industry association boards/committees.

Here are some examples of when you might face a conflict of interest:

Friends, relatives and co-worker relationships

- Business relationships with relatives, spouses, partners/significant others or close friends
- Similarly, intimate relationships of any duration between co-workers can, depending on the work roles, create an actual or apparent conflict of interest.

Political or civic involvement

Your involvement in any civic or political activities must be on your own time, and with your own resources.

POLICIES COVERED:
[CONFLICT OF INTEREST POLICY](#)
[SUBSIDIARY DIRECTORSHIPS POLICY](#)

Outside activities or investments

You may have a personal interest in one of Air New Zealand's existing or potential competitors, suppliers or customers, which might affect or compromise our business, or your ability to perform your job.

These situations can create an actual or perceived conflict of interest if they involve you:

- Having a second job
- serving as a director or consultant, or providing professional services
- having material financial interests in a competitor, supplier or customer, or
- taking part in civic or public duties.

Knowingly maintaining substantial financial interests or investments in a competitor, customer or supplier without disclosing them is not allowed.

Giving and Receiving Gifts and Entertainment

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.

What this means for you:

- Record gifts, hospitality and entertainment on the Gifts Register if valued at NZ\$250 or more.
- Seek prior approval for gifts, hospitality and entertainment valued at NZ\$1000 or more.
- Avoid giving or accepting anything of inappropriate value.
- Avoid giving or accepting any gifts or entertainment during a tender process that would be perceived as preferential treatment or providing an unfair advantage.

POLICIES COVERED:
[ACCEPTABLE USE OF BUSINESS RESOURCES POLICY AND SUPPLEMENTARY STANDARDS](#)



- Think about the context of the gifts or entertainment – imagine how it might look to someone outside of Air New Zealand or to the media.
- Never accept any cash or cash equivalent, even as a tip for great service.
- Never give or accept gifts from competitors or public officials.
- Never ask for gifts, entertainment or any other inducements.

Refer to additional guidance on inducements under the Bribery and Improper Payments section.

Using Business Resources

Resources are provided to you to perform the requirements of your job. All business resources have an economic value, so we must all use them effectively, responsibly and only for business purposes.

What this means for you:

- Use business resources and assets (computer equipment, access to networks, software, internet, desktops, laptops, mobile devices, office furniture, equipment and supplies, vehicles and car parks, branded material and official company images and content) for company business.
- Only use resources that you are authorised to use.
- Only access or use authorised resources or information where there is a legitimate business need.
- Use resources responsibly and cost effectively.
- Don't engage in personal activities during work hours that interfere with you fulfilling your job responsibilities.
- Take all reasonable and necessary steps to protect company resources and assets, including from theft.
- Follow our confidentiality and privacy guidelines when using business resources.

POLICIES COVERED:
[MEDIA COMMUNICATIONS POLICY](#)

Using our Digital Communication Systems

Air New Zealand invests in strengthening our digital workforce and provides a range of IT resources to connect and collaborate as one Air New Zealand. This gives us access to valuable information, sensitive data and internal and external networks that must be protected and used responsibly.

What this means for you:

- Use digital resources in a responsible, ethical and legal manner. Don't use them for activities such as gambling, pornography or other inappropriate purposes.
- Don't use company computers and equipment for personal activities.
- You are personally accountable and liable for all activities associated with your user accounts and company equipment. Incidental personal use of IT resources (email, internet, social media) at work is acceptable as long as it:
 - doesn't affect your, or others' job performance or productivity, and
 - doesn't interfere with operations or system performance (e.g. sending large personal files) or consume significant time or resources, and
 - doesn't create risk to Air New Zealand, and
 - doesn't violate other company policies.





Duty Travel

As an airline, we must balance the needs of commercial customers with our business travel requirements. When planning your business travel, find the right balance between business need, environmental impact, financial cost and your health and safety.

What this means for you:

- Only travel on business when there is a genuine need.
- Obtain the appropriate approvals for travel.
- Use the defined procedures to book travel.
- Use preferred suppliers to help minimise the cost of travel.
- Only claim business expenses that are necessary and reasonable for your business travel. Use a company credit card for travel-related expenses whenever possible.
- Ensure you are medically fit for your planned travel and review safety protocols and security advisories for your destination – discuss any concerns with our Safety and Security teams.
- Personal travel is not to be taken in conjunction with business-related travel.
- To reduce risk, executives, management groups or other key individuals should avoid travelling together.
- Maintain professionalism at all times – you are an ambassador for the airline.

Air New Zealand honours any provision in employment agreements regarding duty travel, where it differs to policy.

POLICIES COVERED:
DUTY TRAVEL AND TRAVEL-RELATED EXPENSES POLICY

Speaking on Behalf of Air New Zealand

As a publicly-listed company, we are bound by strict rules to ensure that publicly released information is appropriately disclosed and accurately reflects the Company's position.

What this means for you:

- Only make comments on behalf of Air New Zealand if you are authorised to do so. This includes when contributing to professional journals or presenting at industry association conferences.
- Before contributing to professional journals or any speaking engagements, gain approval from your GM and have your content reviewed by our Corporate Communications team.
- Direct any media enquiries or requests to the Corporate Communications team.
- Never disclose commercial or strategic information about the Company, our employees or our customers without permission, even after you leave Air New Zealand. This includes sharing information intended for internal use only with third parties.
- Return any unsolicited confidential information you receive to the sender or ensure it's deleted.

POLICIES COVERED:
MEDIA COMMUNICATIONS POLICY

Using Social Media

We recognise the importance and benefit of communicating through social media. We want to empower all our employees to be good ambassadors for our brand, but be mindful that what you post online could have unintended consequences.

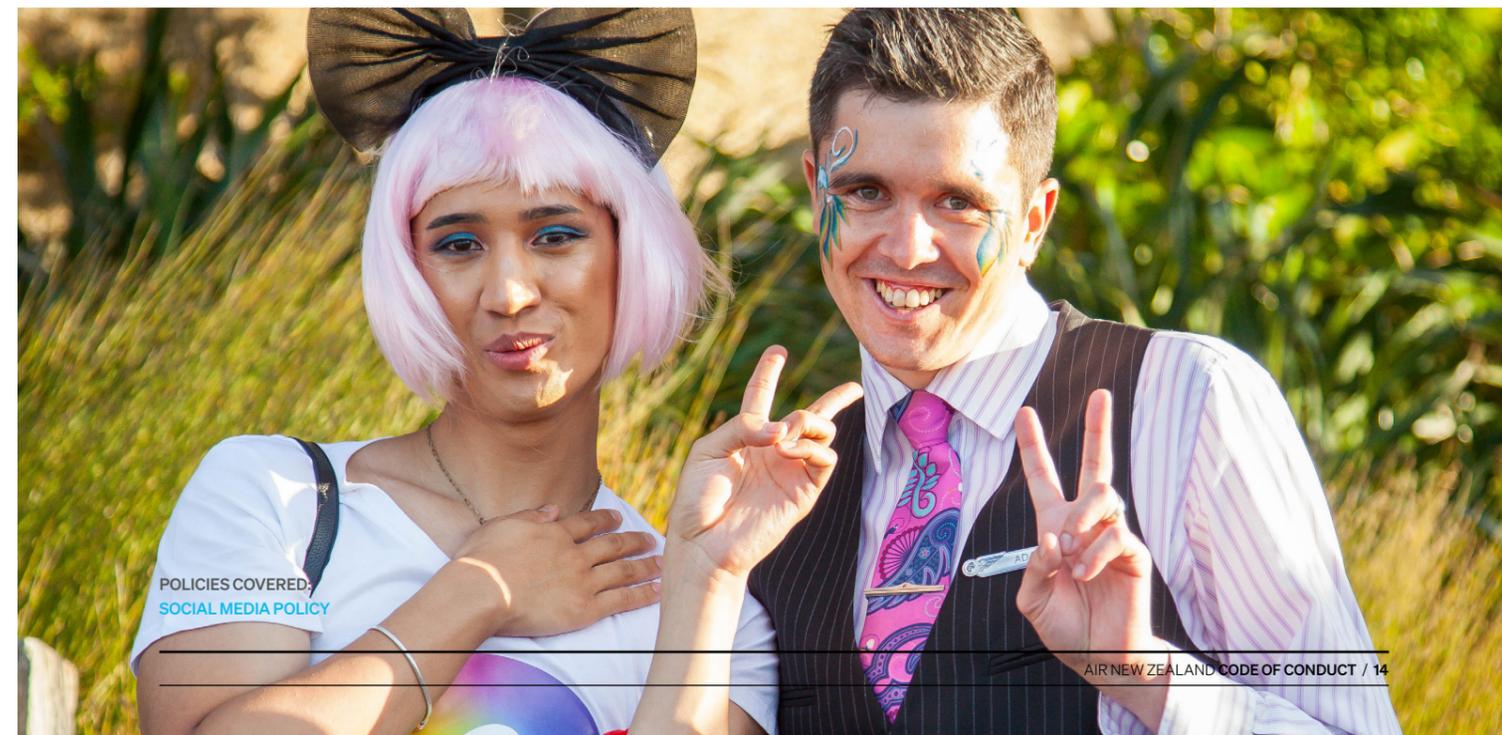
Follow these general guidelines when using social media – both inside and outside of the Company:

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

What this means for you:

- You are personally responsible and liable for anything you post online, whether speaking personally or in an official capacity for Air New Zealand.

- Separate your personal social media sites and accounts from work-related ones. Avoid using Air New Zealand sites to distribute personal communications, and never use official company images on personal social media.
- Clearly show when posts or comments are your own views, and not that of Air New Zealand's, when you talk about work related matters.
- Don't disclose information about others, misuse personal data or post photos without their knowledge and permission.
- Be mindful of copyrights, trademarks and intellectual property rights of others. Never post copyrighted material (including published music, movies or video content) without permission.
- Honour any confidentiality and non-disclosure requirements, even on personal sites.
- Never post information about legal matters, including corporate transactions or investigations.
- For security reasons, never post details (including videos or photos) of any secure or restricted area, such as aircraft hangars or maintenance areas, runways, airline passenger areas, interiors of aircrafts cabins, cockpits, under carriage, landing gear and baggage holding areas.



POLICIES COVERED:
SOCIAL MEDIA POLICY



3. PROTECT OUR PEOPLE, PROPERTY AND INFORMATION

Financial Integrity

We expect all Air New Zealanders to understand the financial management responsibilities relevant to their roles and be good stewards of company funds. Our financial and accounting controls ensure we apply sound financial principles in our business transactions. We are all responsible for following our policies and legal, financial and accounting regulations.

What this means for you:

- Understand the financial management responsibilities, policies and processes relevant to your role.
- Understand when you can and when you can't commit company funds.
- Only spend company funds on legitimate business needs. Spend responsibly and keep expenditure within budget.
- Strive to find the best value when spending company money by considering quality, service, reliability, sustainability, compliance with our finance and procurement policies and any terms and conditions.
- Base your financial decisions on sound and objective information.
- Run transparent tendering processes for suppliers and business relationships.
- Report any suspected misuse of company property or funds.

Committing to Contracts and Expenditure

It is critical for Air New Zealand to have oversight of its spend and commitments across the entire lifecycle. We have defined processes for interacting with suppliers, negotiating supply contracts and making purchasing decisions. Legally binding contracts, with agreed terms and conditions, are required before we can commit our resources. These agreements protect us from financial, commercial and legal risk.

What this means for you:

- Ensure you understand how Delegated Financial Authority (DFA) rules apply to your role.
- Ensure every purchase, requisition or order you make is approved within DFA.
- Only make commitments or decisions on behalf of Air New Zealand if you are authorised and within your DFA. Unless explicitly delegated, no employee or contractor may commit to a contract or incur expenses.
- Follow defined processes and use approved suppliers when sourcing and purchasing goods and services.
- Report any breaches of DFA to your 2-up manager, or to your delegator's 2-up manager, in accordance with the DFA Policy.
- Ask Procurement if in doubt before ordering a product or service.

Accurate and Complete Information, Records, Reporting and Accounting

Honest, complete and accurate recording and reporting of information is critical to protecting our credibility and reputation, and meeting our legal obligations. Failure to keep accurate and complete records, falsifying information or creating misleading information could constitute fraud, with civil and criminal liability for Air New Zealand and individuals involved.

What this means for you:

- Always follow the correct governance for the approval of contracts and projects.
- Record and report company information accurately and objectively, with reasonable detail and supporting documentation for all transactions.
- Don't make false or misleading entries (or inappropriately alter) on company books, records or expense claims for any reason.
- Comply with the Company's system of internal controls.
- Be alert for unauthorised payments or invoices – ensure that no undisclosed or unrecorded or 'off the books' amount, fund or asset is established or maintained (see the Anti-money Laundering section for more information).
- Cooperate fully with Internal Audit, Group Finance and external auditors and provide them with accurate information and unrestricted access to necessary resources.
- Report any concerns or irregularities in accounting, auditing or internal controls.
- Secure all information to prevent unauthorised access or disclosure.
- Understand and follow our data retention standards for creating, retaining and destroying company information.

POLICIES COVERED:
 FINANCE & ACCOUNTING POLICIES
 RECORD RETENTION AND DESTRUCTION POLICY
 AUDIT INDEPENDENCE POLICY

Protecting Privacy and Confidentiality

Privacy is about how we collect, use, process and share personal information about individuals, and how we respect the rights of our customers, employees and business partners with regards to their information. Privacy is also about regulatory compliance. As an international airline, we are obligated to comply with personal information protection guidelines, specifications and legislation everywhere we fly.

What this means for you:

- Take care when you are accessing or using personal information and treat it as confidential.
- Limit sharing, or access, to authorised people only who have a clear business need for that information.
- Keep personal information no longer than necessary to accomplish the legitimate purpose (legal, regulatory or legitimate business need).
- Be aware of local privacy laws, especially when transferring personal information outside of its country of origin.
- Be objective when making written comments about people, as all personal information may be disclosed. Personal information, including your opinions, should be relevant, appropriate, accurate and justifiable.
- When using electronic communications, take extra care to ensure that any sharing of personal information is done in a secure and protected way.
- If you believe personal information has been accidentally or intentionally viewed, shared, altered, stolen or used in an unauthorised way contact Privacyofficer@airnz.co.nz.

POLICIES COVERED:
 PRIVACY POLICY



POLICIES COVERED:
 FINANCE AND ACCOUNTING POLICIES
 PROCUREMENT POLICY
 DELEGATED FINANCIAL AUTHORITY POLICY



Keeping Information Secure

Information is one of our most valuable assets. We must protect our company and customer information from unauthorised access by securing it appropriately at all times.

What this means for you:

- Classify and store information that you use for work in line with the Information Classification Policy.
- Protect your password. Don't share it with anyone or write it down.
- Protect information sensitive and confidential documents at all times. This includes looking after laptops, mobile devices and storage devices when left unattended.
- Dispose of information securely when it's no longer needed.
- Never save sensitive or confidential information on unauthorised systems or storage devices.
- Lock your computer screen if you leave your computer unattended and switch off your computer at the end of the day.
- Report incidents, breaches or lost laptops or mobile devices immediately to the IT Service Desk.
- Think before you click. Be careful when opening attachments from unknown addresses. Don't click links which may take you to unsafe websites.
- Only use authorised software and hardware.
- Notify the Information Security team of any suspicious activity such as phishing emails or scams.

POLICIES COVERED:
CYBERSECURITY POLICY AND STANDARDS

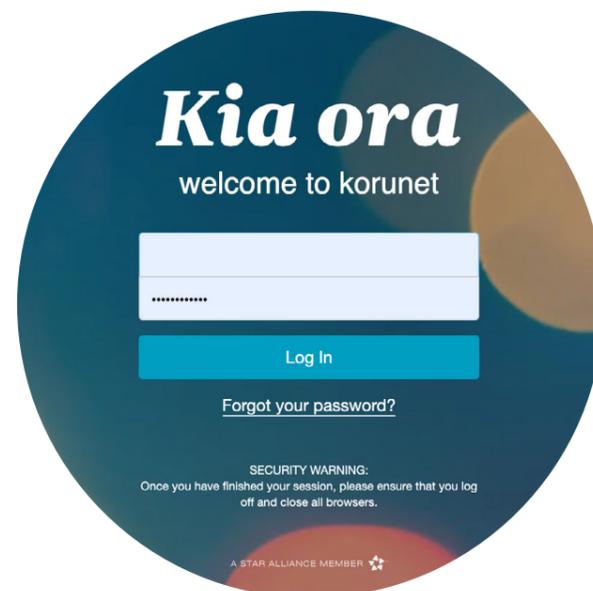
Protecting and Respecting our Property

Our brand, designs, patents, trademarks, copyrights, trade secrets and know-how – our intellectual property ('IP') are valuable assets that we must safeguard.

We must comply with applicable laws and regulations that help us protect our IP from theft or misuse – and in doing so, ensure it's available to us for future innovation.

IP includes:

- our brand, designs, patents, trademarks, copyrights, trade secrets and know-how
- pricing, marketing and customer strategies and plans
- research and technical data
- business ideas, processes, proposals or strategies
- new product and/or package design and development
- software bought or developed by the Company
- information used in trading activities.



POLICIES COVERED:
CONFIDENTIALITY POLICY
RECORD RETENTION AND DESTRUCTION POLICY

What this means for you:

- Protect all confidential, proprietary or other IP information (whether printed material, electronic files, email, or verbal conversations), even after you leave Air New Zealand.
- Comply with our Brand Guidelines.
- Never allow any third party to use our brand or trademarks without first discussing it with Legal.
- Retain confidential or proprietary information or other IP in accordance with our Record Retention Policy, and only share it with those who are authorised and have a business need for the information.
- Use Confidentiality Agreements before disclosing confidential information to outside parties.
- Avoid disclosing any details of new products, designs, patents, trademarks or other confidential or IP in public places, or with friends and family, or anyone not authorised to access it.
- Report any suspected misuse or theft of logos, trademarks or other Air New Zealand IP to Legal.
- Report any lost or stolen confidential information or other property immediately to Legal and Security.
- Obtain permissions before using the IP of others and report any activities that infringe on the IP of others.



4. TREAT PEOPLE FAIRLY AND WITH RESPECT

Equality, Diversity and Inclusion

We strive to create a working environment where everyone feels respected and valued, and that reflects the diversity and characteristics of the communities in which we operate and the customers we serve. We respect and value the contribution of each team member, and regard discrimination as unfair, unacceptable and unlawful. The Air New Zealand Group has zero tolerance for any form of Unlawful Discrimination of employees or potential employees.

What this means for you:

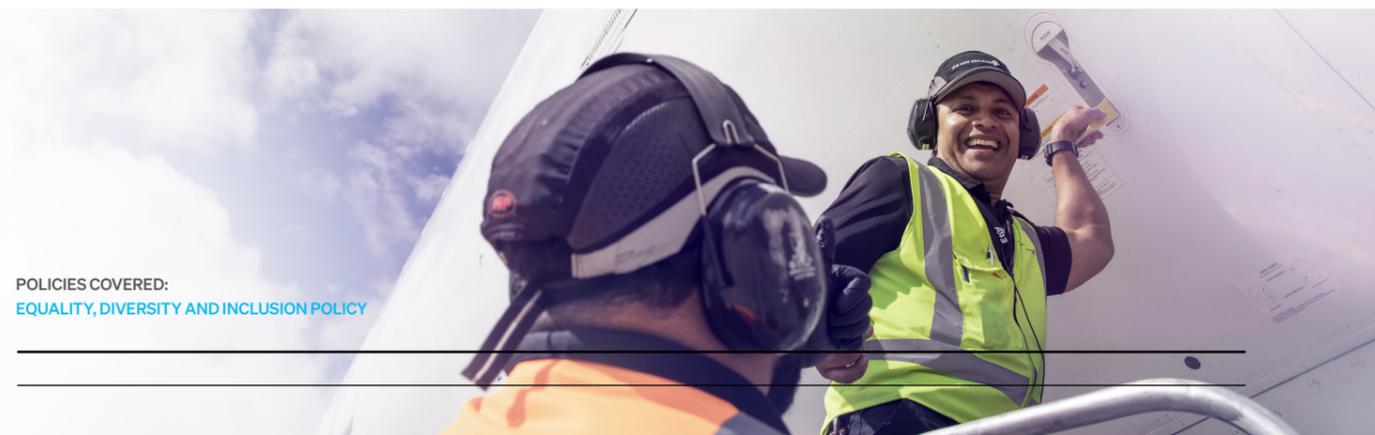
- Act fairly and show respect towards others in all your dealings.
- Actively seek, value and be mindful of cultural sensitivities and different perspectives present in our global community.
- Challenge discriminatory behaviour.
- Be inclusive in the language you use when communicating.
- Report any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

Merit-based Talent Acquisition

We are committed to attracting, developing and advancing the best people through a fair and merit-based process, and ensuring the process is free from bias and discrimination. We adhere to all employment regulations regarding staff, contractors and other complementary workforce (outsourced workers, agents).

What this means for you:

- Base your decisions about recruitment, selection, development and advancement of employees on merit.
- Never allow race, colour, religion, gender, disability, age, country of origin, sexual orientation, gender identity, marriage status or any other characteristic protected by any applicable law to influence your judgement.
- Understand your responsibilities and comply with all applicable labour and employment laws.
- Expect others you work with (contractors, agents, joint ventures) to act in a way that is consistent with our fair treatment and equal opportunity standards.
- Report any breaches of law or this Code, or any incidents that are inconsistent with our commitment to equal opportunity, inclusion and diversity when you become aware of them. Cooperate with company investigations.



POLICIES COVERED:
EQUALITY, DIVERSITY AND INCLUSION POLICY



Preventing Bullying and Harassment

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

Harassment includes language or conduct that may be derogatory, intimidating or offensive to others.

Bullying and intimidating behaviour is repeated inappropriate behaviour that undermines someone's right to respect at work.

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.
- Seek support from your manager, your manager's manager, your HR Business Partner or People Safety teams.

POLICIES COVERED:
HARASSMENT AND SEXUAL HARASSMENT: PREVENTION AND COMPLAINTS POLICY
WORKPLACE BULLYING PREVENTION AND COMPLAINTS POLICY

Air New Zealand will not tolerate any form of harassment or sexual harassment in the workplace, whether that is internal or third-party harassment towards an Air New Zealand employee, contractor or other representatives of the Air New Zealand Group. We may initiate disciplinary or legal action against people who harass or bully others. This includes suppliers, customers and other visitors to our premises.

Ethical Business Practices of Suppliers

We engage with suppliers who share our commitment to sound, sustainable, safe and ethical business principles.

We are committed to doing business with suppliers who, as a minimum:

- Supply products that are manufactured in safe and healthy conditions
- Operate in an ethical manner
- Use voluntary workers (not indentured, forced or bonded labour of any kind), that are paid a proper wage under human conditions, are not discriminated against, exploited or subject to any kind of abuse, and work in conditions which are humane
- Do not use child labour.

What this means for you:

- Before engaging a supplier or business partner, do your due diligence on ethical conduct requirements.

POLICIES COVERED:
SUPPLIER CODE OF CONDUCT

5. COMPLY WITH THE LAW

Anti-money Laundering

Money laundering is the use of transactions by criminals, terrorists, or others to conceal the illegal source of their funds. We are committed to the highest standards of anti-money laundering compliance to prevent use of our products and services for money laundering purposes or for financing of terrorism.

What this means for you:

- Use defined processes in your area to identify and manage money laundering activities and the financing of terrorism.
- Complete customer due diligence to verify their identity.
- Look out for any suspicious transactions using cash payments or monetary instruments.
- Follow procedures to report money laundering or illegal financing activity.
- Report any suspicious activity to Legal immediately.

Export and Sanctions (and Military Involvement)

What this means for you:

- Do not undertake work or contract or project, at its outset or over time, that involves work for any military outside of the Five Eyes without Executive approval.
- Check carefully before exporting whether the relevant goods are export controlled. Refer to the [Export Controls and Sanctions List](#).

POLICIES COVERED:
CONTINUOUS DISCLOSURE POLICY
ANTI-BRIBERY & CORRUPTION POLICY
GIFTS AND ENTERTAINMENT POLICY

- Screen all parties involved in a transaction or agreement against the [Export Controls and Sanctions List](#) to ensure they are not sanctioned. Irrespective of whether the country is sanctioned, consider whether the country raises any geopolitical or reputational concerns.
- Seek guidance from Government Affairs or the Group Security team and consult the Legal team if in doubt.

Ensuring Continuous Disclosure

Air New Zealand is a listed public company under the New Zealand Stock Exchange, and must comply with the NZX Listing Rules. Harsh penalties exist for breaches of the Listing Rules and other applicable laws which may result in personal exposure to regulatory penalties, company liability and disciplinary action.

What this means for you:

- If you become aware of anything that may be considered 'material information', immediately discuss it with a member of the Disclosure Committee. Material information means any information that a reasonable person would expect, if it were available to the general market, to have a material effect on Air New Zealand's share price (i.e. commercially and price sensitive)
- If in doubt whether it is 'material information', keep it confidential and seek guidance from Legal.
- Keep the material information confidential until officially disclosed to the public.
- Only conduct discussions with analysts, investment professionals, shareholders or other market participants if you are an Authorised Spokesperson as defined in the Continuous Disclosure Policy.

Eliminating Bribery, Corruption and Improper Payments

The law prohibits bribery in every kind of commercial setting. Facilitation payments, or kickbacks, are examples of bribery and are illegal. Giving or receiving gifts or entertainment might also be bribery in certain circumstances, as many countries have stringent rules that prohibit giving anything of value to public officials to influence their actions.

What this means for you:

- Be cautious when giving or receiving gifts or entertainment, especially when a public official is involved (refer to the Gifts and Entertainment policy for more information).
- Ensure that all gifts and entertainment are permitted by local law.
- If you are engaging third parties, always complete sufficient due diligence to confirm that bribery is unlikely, before any agreement or contract is signed or renewed, or before any work is undertaken under that relationship.
- Refuse to pay facilitation or other improper payments.
- Never make donations to political parties, candidates, or to any political cause or election fund.
- Never make charitable donations for purposes of gaining commercial advantage.
- Never make, offer to make or authorise payment to a third party knowing that the payment will be offered or given to secure an improper commercial advantage or secure an improper business benefit. Even charitable donations can be seen as bribes if payments are made to facilitate a process or secure a commercial advantage.

POLICIES COVERED:
ANTI-BRIBERY & CORRUPTION POLICY
GIFTS AND ENTERTAINMENT POLICY

- Maintain accurate and complete records of payments made to third parties to evidence the business reason for such transactions.
- Providing money or gifts to any Public Official for the purpose of influencing them in their official capacity is not allowed.

Avoiding Insider Trading

In most countries, it is illegal for people to profit from insider trading (trading securities or manipulating share prices based on 'inside information' – information that is not publicly available that we may have as a result of working for Air New Zealand, and that is 'material' or could have an impact on the value of those shares or securities if it was made public). These rules apply regardless of how you acquire the inside information, whether you are aware of the sensitivity of the information, and continue even after you stop working for Air New Zealand. Insider trading can result in severe penalties including criminal liability, fines, and imprisonment.

What this means for you:

- Protect inside information from accidental disclosure.
- Never spread false information or engage in activities to manipulate the price of publicly listed securities.
- While having 'inside information', you are prohibited from directly or indirectly:
 - trading securities of Air New Zealand
 - trading securities of any other publicly traded company
 - leaking, tipping off or otherwise passing inside information to third parties.
- If you have questions or concerns about insider trading, contact Legal for guidance.

POLICIES COVERED:
ANTI-BRIBERY & CORRUPTION POLICY
GIFTS AND ENTERTAINMENT POLICY
SECURITIES TRADING POLICY



Competing Fairly

We make independent business decisions that are in our best commercial interests, compete fairly, and comply with all applicable competition laws around the world.

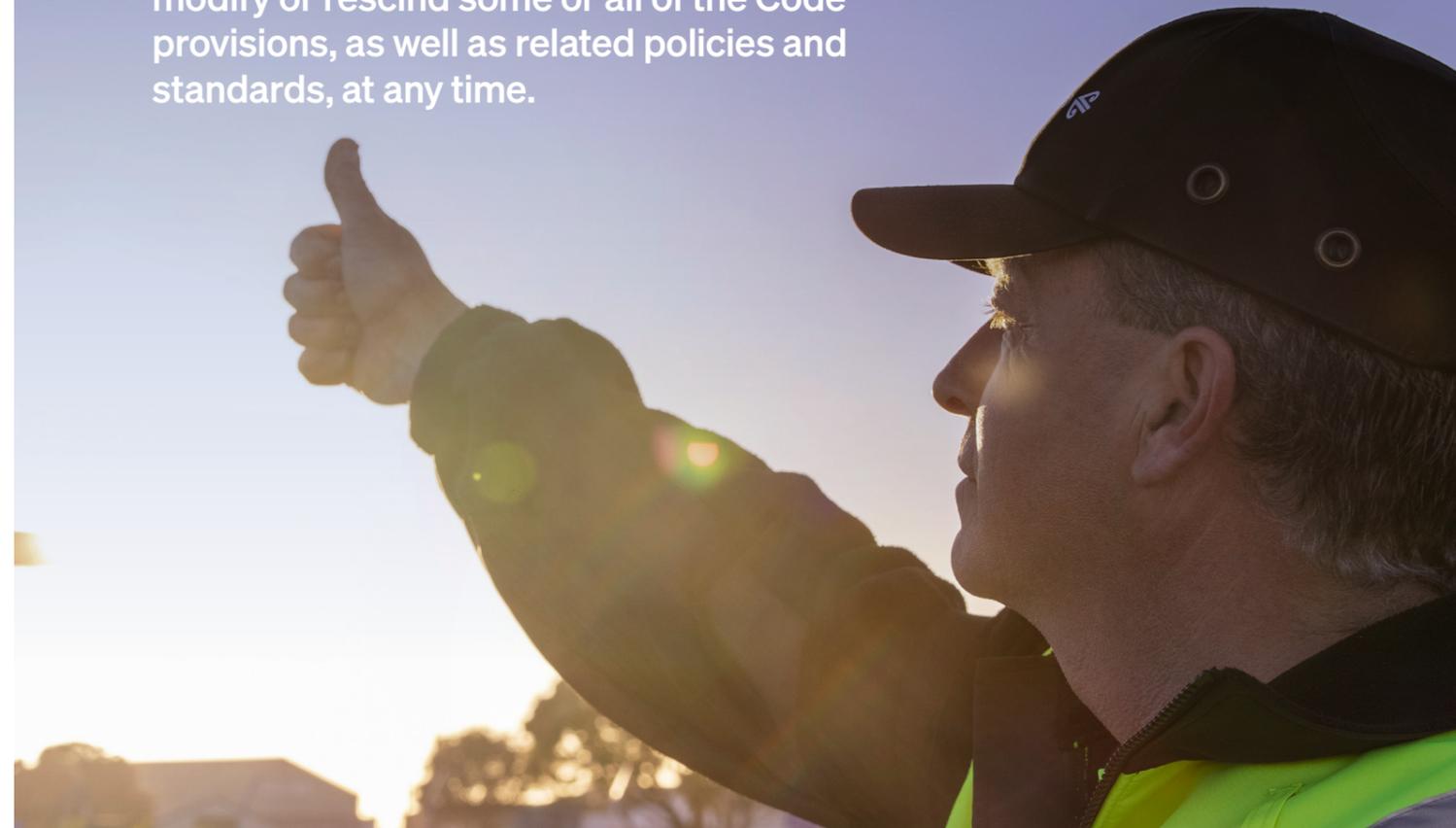
What this means for you:

- Never pursue any unfair advantages or misrepresent facts about our business when engaging with customers, suppliers and competitors.
 - Never exchange sensitive information with competitors.
 - Never make false or misleading statements about our competitors.
 - When dealing with competitors, do not to participate in any arrangement that could be construed as anti-competitive collusion.
 - Never enter into anti-competitive agreements with competitors, (such as price fixing, bid rigging, market allocation and agreements) to restrict supply to another competitor.
 - Never discuss costs, pricing or competitive bids with competitors or agree on who will win a competitive bid.
- Always collect competitor information in legally appropriate and ethical ways.
 - Unless you obtain prior approval from Legal, don't:
 - engage in benchmarking or other information exchanges or activities with competitors – use publicly available information instead
 - begin any negotiations on mergers, acquisitions, joint ventures or similar transactions, especially if competitors are involved
 - negotiate in joint activities with competitors to influence government action.
 - Never use trade associations or professional societies for contacts or communications with competitors that violate the law or company policy, such as discussions about price or other sensitive information.
 - Never encourage customers, suppliers or former employees of competitors to provide information that they should keep confidential.
 - If you have any concerns, contact Legal.



LIVING OUR CODE

This Code is not a contract of employment, and Air New Zealand may interpret, modify or rescind some or all of the Code provisions, as well as related policies and standards, at any time.



Abiding by our Code

Agreement to abide by the Code

All Air New Zealanders must acknowledge that they've read, understood and agree to abide by the Code. We are required to do this when we are hired and to renew this commitment annually by completing Code of Conduct refresh training.

Consequences of non-compliance

Our Code represents our commitment to do the right thing, including respecting the rights of others. As an Air New Zealander, you agree to uphold this commitment. If you don't, you could put yourself, your colleagues and Air New Zealand at risk.

Our Just Culture philosophy 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 and is misconduct, which could result in disciplinary action and even dismissal. Breaches of law may also result in civil or criminal penalties.

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