A person is working at a desk. In the foreground, there is a white mug on a saucer, a red folder, and a spiral-bound notebook. A hand is holding a pen and writing on the notebook. A laptop is partially visible in the background.

Our ways of
working.
Ā mātou
tikanga mahi.

Public Trust's
Code of Conduct

Te Tikanga Whakahaere
a Te Tari Tiaki Iwi



Public Trust



How we show up

Ka pēhea e whakaaturia ai ā mātou mahi

Public Trust/Te Tari Tiaki Iwi has a proud history as New Zealand's largest and most experienced trustee services provider. Our team is united around a clear vision to ensure our products and services are compelling, relevant and accessible to all New Zealanders.

We're an organisation that's known for our expert advice and professionalism, proud to consistently strive to build a culture of trust, transparency and empathy.

To deliver on these aspirations, we need to ensure we have the enduring trust of our customers, business partners, and each other.

This document, also known as our Code of Conduct (the Code), sets out our business principles and what we expect from every person working at Public Trust.

Public Trust is committed to the highest standards of purpose and values at all times. Please take some time to read through and apply these principles in your work.

The Code applies to everyone including our Board, executives, employees and contractors.

What does this mean for you?

We expect you to:

- behave in a lawful and ethical manner.
- comply with the [State Services Standards of Integrity and Conduct](#).
- comply with all Public Trust internal policies and rules (some of which are outlined in this Code).
- do the right thing when making decisions in your daily activities.

We need all employees to read, understand and live by this Code. We also acknowledge that this Code does not attempt to address every situation that might occur, however it serves as a good guide for doing what's right. Public Trust has a range of policies that contain more detail on specific areas that may also apply to you. You are expected to familiarise yourself with all policies that apply to you and the role you occupy. Your leader, the People & Culture team and Legal & Risk team are available to help you if you need them.



At Public Trust,
we empower all
New Zealanders
to build and protect
their legacies.

We choose to honour the
principles and intent of this Code.

E kōwhiri ana mātou ki te
whakamana i ngā mātāpono me te
whakaaro o tēnei tikanga.

As a Crown Entity, we have an important role to play in guiding
and supporting Kiwis.

Our Grow Together strategy sets out our strategic aspiration
to grow a sustainable trustee and supervisory services
organisation that is compelling, relevant and accessible to all
New Zealanders.

To help us achieve this aspiration, we live and breathe our
culture of care, which puts our people, customers and
communities first.

Our four values are the foundation of our culture and guide the
way we interact with each other as well as those outside our
organisation, including customers, clients, communities and
other important relationships.

Our values are
Ō mātou uara

We make the tricky seem simple

Some things we do are hard to talk about – death, money
and the future. By simplifying the complex, we help New
Zealanders navigate these tricky subjects. We build trust by
always being clear in what we say and upfront with how the
actions taken today will affect the future.

People are at the heart of everything we do

We have a proud history of standing up for what we believe is
fair and championing all New Zealanders; it's something we've
been doing for generations. Our customers and communities
trust us to listen, care and understand what's needed in order
to find the best solutions for them.

We are better when we work together

We are a collective of talented individuals, who always have
each other's backs. This deep trust gives our people the
confidence to bring their unique skills and diverse perspectives
to work each day, to try new things, learn from mistakes and
celebrate success together.

We have the courage to make a difference

We are hungry to do better. Our desire to do more for every New
Zealander, and our confidence in our team gives us the curiosity
and motivation to courageously uncover new and innovative
ways of doing business – helping people to open up.

By choosing to work at Public Trust, we are choosing to
honour the principles and intent of this Code. At its heart, this
Code sets out our obligations as Public Trust employees and
employees of the wider state sector and how we must be fair,
impartial, responsible and trustworthy.




Speak up! Kōrero mai!

Our [Protected Disclosures \(Whistleblowing\) Policy](#) encourages all current and former employees to let us know if they see any serious wrongdoing at work. It's safe, secure and confidential.

If you see behaviour at work that is in breach of our Code or seems illegal or unethical, then you have a duty to report it, even if you only suspect it. This may be bribery, theft or fraud, price fixing or a breach of privacy.

You are also expected to report any abuse of our systems, or a non-compliance with processes or policies. This may be bullying or harassment, conflict of interest or a health and safety risk that could seriously harm our employees or customers.



We want to create an environment in which all our people feel it is safe to speak up about things that don't feel right. It's an important part of our culture of care - if we all feel safe and supported, then we're more likely to bring our best selves to work for our customers and each other.

We have a dedicated 'Safe to Speak' hotline, which is a secure, independent channel our people can use to speak up about potential wrongdoing, while remaining anonymous. This service is provided by Report it Now, who work with a range of other NZ businesses. There is a dedicated Safe to Speak Response Team at Public Trust who will support the internal investigations of any reports made, while maintaining the confidentiality of the person who reported it.

[Find out more](#) about how we're making it safe for all our people to speak up or to report something.

What happens if I breach the Code?

Ka aha mēnā ka takahia e au te Tikanga?

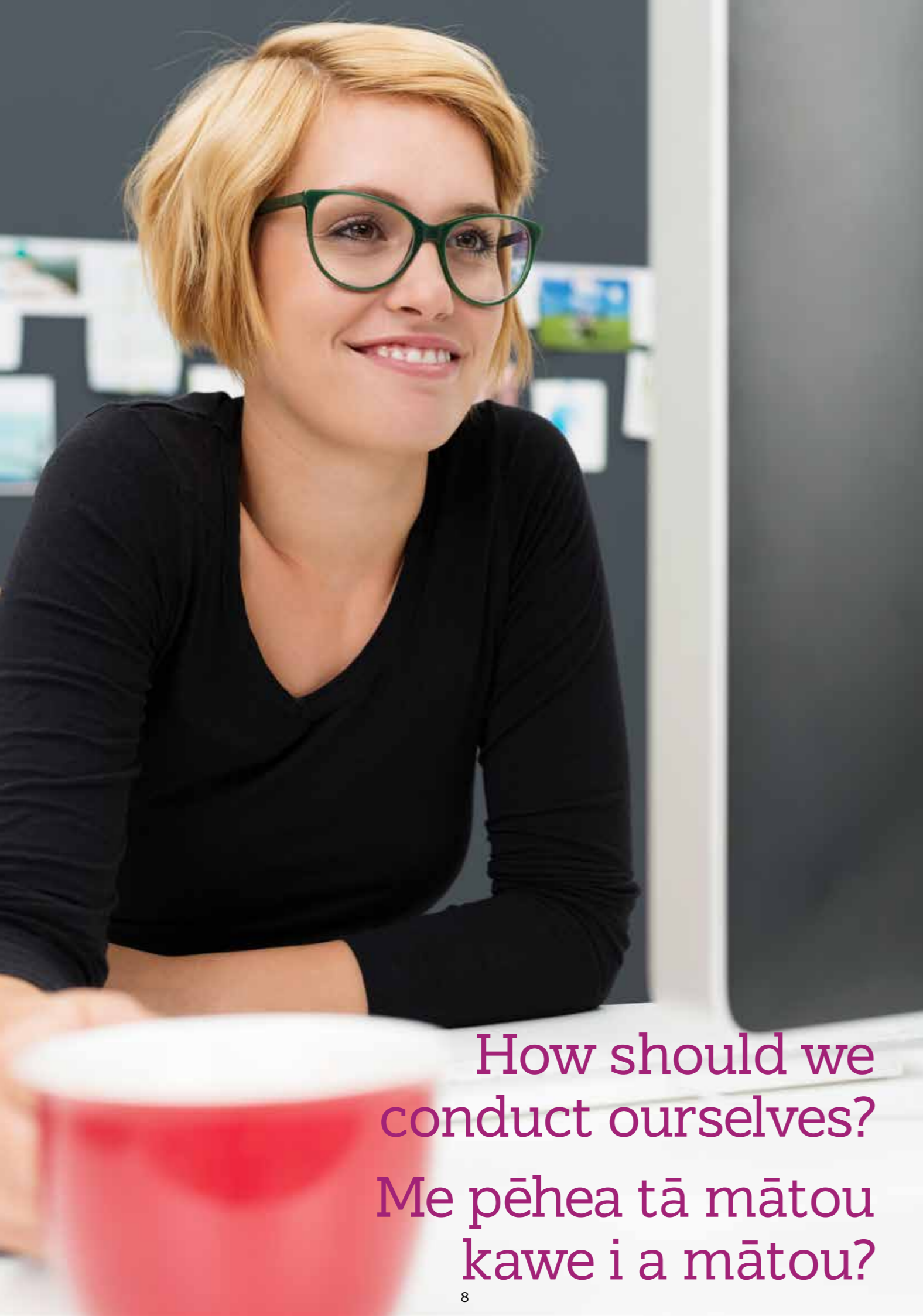
As a Crown Entity, the [State Service's Standards of Integrity and Conduct](#) apply to all Public Trust executives, employees and contractors. The Standards of Integrity and Conduct require us to act with a spirit of service to the community and meet high standards of integrity and conduct in everything we do. Specially, it requires us to be:

- ▀ Fair.
- ▀ Impartial.
- ▀ Responsible.
- ▀ Trustworthy.

All Public Trust executives, employees and contractors must familiarise themselves with the Standards of Integrity and Conduct, as they are considered part of this Code and a breach of those standards will be considered a breach of this Code.

Breaches of this Code by employees may result in disciplinary action. Please refer to the Disciplinary and Performance Management Policy for more details.

The Standards of Integrity and Conduct is attached in the appendix.



How should we conduct ourselves? Me pēhea tā mātou kawē i a mātou?

Avoiding conflicts of interest Te karo i ngā pānga matakū

Public Trust relies on the good judgement of all our people when making work-related decisions. This means you need to be free from actual, perceived or potential conflicts of interest. A conflict of interest can happen if your personal, social, financial or political activities interfere (or could interfere) with your judgement in work-related decisions.

Whenever possible, conflicts of interest should be avoided. You should always try to remove yourself from situations that may compromise your authority or integrity in relation to making decisions.

What does this mean for you?

- You must act in Public Trust's best interests and make objective decisions.
- Discuss conflict of interest concerns immediately with your leader and report them to the People & Culture team.
- Where a conflict has been identified, comply with any instructions from your leader, Legal & Risk or the People & Culture team.
- 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.

More information is available in our [Disclosure of Interest Policy](#).

Avoiding drugs and alcohol Te karo i te kai pūroi me te waipiro

It's important that our people come to work every day with the ability to look after others and we're proud to be an alcohol- and drug-free workplace. That's why being affected by alcohol or other drugs (including prescription medication) in the workplace that impairs judgement, performance or behaviour is unacceptable. The possession, use, sale or distribution of illegal substances at work will also be treated very seriously.

What does this mean for you?

- Never work while affected by alcohol or any other drugs that impair judgement, performance or behaviour.
- Never drive a vehicle for business purposes during work hours or on work duties if you are drug or alcohol impaired.
- Don't consume alcohol on our premises unless it's authorised in accordance with the [Social Drinks Policy](#).
- If you are on prescribed medication or other legal drugs which may impair your ability to work, you must discuss this with your leader or the People & Culture team.

More information is available in our [Social Drinks Policy](#).

Speaking on behalf of Public Trust Te kōrero mō Te Tari Tiaki Iwi

We'll communicate openly and transparently with all our stakeholders within the bounds of commercial confidentiality and our privacy obligations.

No one should make comments on behalf of Public Trust unless they are authorised by the CEO and the Head of Culture and Communications.

We must always be aware that we are representatives of Public Trust and what we say or the way we behave in public represents the organisation.

What does this mean for you?

- Only speak on behalf of Public Trust if you have authority to do so.
- You need to have permission to disclose commercial or strategic information.
- Direct all media enquiries to the Communications Consultant or Head of Culture and Communications.

More information is available in our [Media Policy](#).

Using social media Te whakamahi paepāho

Social media can be a powerful tool for Public Trust, though it needs to be handled with care. Accordingly, only the Communications team is authorised to operate Public Trust's social media channels and respond to customers or the public through social media on behalf of Public Trust.

Our reputation is also influenced by your personal social media presence. Therefore, we ask you to take care when using your private social media accounts. It's important that you don't contact or respond to customers or use the Public Trust logo or name to endorse products or causes.

What does this mean for you?

- Don't make any personal comments that could be interpreted, even mistakenly, as a comment made by Public Trust.
- Don't post or release any information about Public Trust of a confidential, financial or legal nature or any information about other employees or customers.
- Don't use official company images or information on your personal social media without permission.

More information is available in our [Social Media Policy](#).

Using our information systems Te whakamahi i ā mātou pūnaha mōhiohio

We trust all of our people to take care with the sensitive data and valuable information that they have access to through the use of our IT systems and resources.

You are expected to use these systems and resources in a responsible, ethical and legal manner.

Personal use of these resources is acceptable (for example, email, internet and printing) however it should not be excessive or affect your or others' job performance or productivity. You must not use our resources for outside business or personal gain. Your personal use of Public Trust resources must not create a risk for the business and it must not violate other policies.

You are personally accountable and liable for all activities associated with your user accounts and company equipment. Any abuse of Public Trust's systems and resources will be treated very seriously.

What does this mean for you?

- Don't use work resources for illegal, objectionable or inappropriate purposes.
- As a general rule, don't use work resources for personal matters or personal resources for work purposes.

More information is available in our [Information Security Policy](#).

Accessing records Te whakauru atu ki ngā rekoata

Public Trust has a records management system. This means that in most instances, all employees have access to most Public Trust records. However, employees must not access any records unless they have a legitimate work-related purpose for doing so. Specifically, employees must not access their own records (if they are also a Public Trust customer), or the records of their friends or families.

Accessing files for illegitimate purposes is a serious breach of Public Trust policy, which may cause Public Trust to be in breach of the Privacy Act 2020, our commercial contracts and general obligations of confidentiality.

Public Trust will undertake monitoring and auditing of records to determine if any illegitimate access occurs.

For the purposes of this section, 'accessing' a record includes reading, editing or deleting / destroying the record, whether in electronic or hard copy format, and regardless of where and how the record is stored.

What does this mean for you?

- Never access any records unless you have a legitimate work related purpose for doing so.
- Never access your own records or the records of your friends or family.
- Don't simply browse records for no particular reason.

Privacy and confidentiality Te tūmataiti me te matatapu

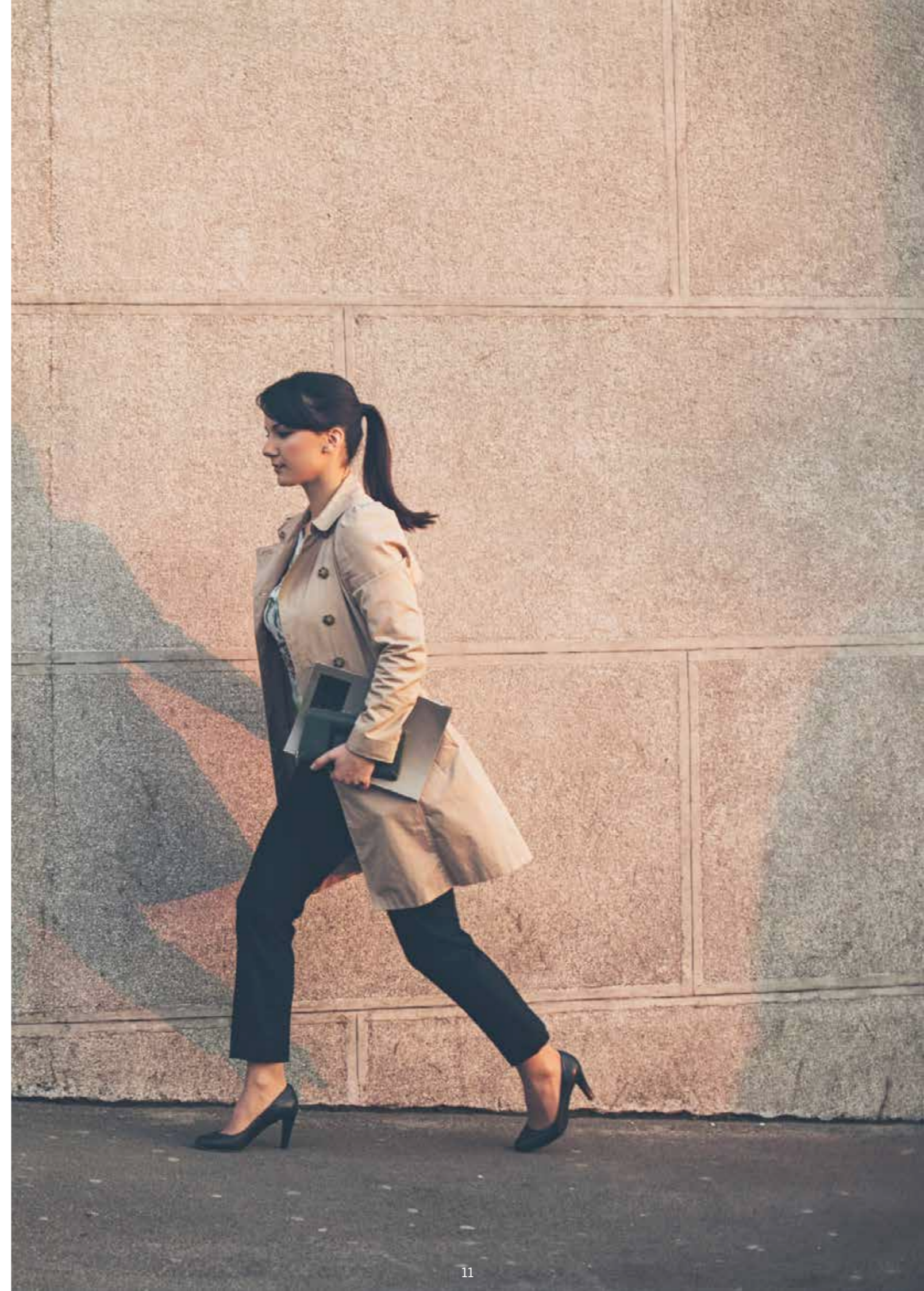
All employees will handle personal or confidential information whilst working at Public Trust. The proper management of this information is vital to our business. You have a duty to handle customer information appropriately and ensure that personal privacy rights are preserved. Likewise, you need to ensure that confidential business information is kept secure.

It is not acceptable (and likely illegal) for you to make use of information that you have learned through work to benefit you personally, a family member or friend, or to disclose it in any way, unless you have permission to do so.

What does this mean for you?

- Be careful when handling personal or confidential information – our customers expect it.
- Take the time to ensure correspondence is addressed correctly and includes the correct attachments.
- Let a Privacy Officer know immediately if you make a mistake and information is disclosed to the wrong person.

More information is available in our [Privacy Policy](#).





Our workplace

Tō mātou wāhi mahi

Diversity and inclusion Kanorau me te whakaurunga

Public Trust is committed to creating an inclusive working environment where everyone feels respected and valued. Our people reflect the diversity and characteristics of the communities in which we operate and the customers we serve.

We will not tolerate any form of discrimination in the workplace. We will challenge any discriminatory behaviour when we see it and want everyone to feel empowered to raise any concerns with management.

What does this mean for you?

- Act fairly and show respect towards others in all of your dealings.
- Be aware of cultural sensitivities when working with others (employees or customers).
- Raise any concerns with your people leader or the People & Culture team.

Preventing bullying and harassment Te ārai i te whakaweti me te whakatīwheta

It's everyone's responsibility to behave in a way that is kind and respectful of each other. We all need to ensure that bullying and harassment aren't part of how we work at Public Trust.

Harassment and bullying can take many forms and have serious repercussions. Harassment includes language or behaviour that may be derogatory, intimidating or offensive to others. Bullying is repeated inappropriate and intimidating behaviour that undermines a person's right to dignity at work.

If there is an allegation of harassment or bullying, Public Trust is obliged to investigate and initiate disciplinary action or legal action against the person who harasses or bullies others.

What does this mean for you?

- Never behave in a way that is unwelcomed, intimidating or offensive, including threats, bullying, or actions of a sexual nature.
- Never be derogatory or abusive to or about others.
- Always treat others with respect.
- If you don't feel comfortable addressing any forms of harassment or bullying directly and feel there isn't anyone you can go to, you can call or email

our confidential and impartial [Report it Now](#) service phone line.

More information is available in our [Bullying, harassment and Discrimination Policy](#).

Employee safety and wellbeing

Our goal at Public Trust is to have a safe and healthy workplace of work and to keep our employees, customers, visitors and contractors safe. We all need to work together to achieve this goal and demonstrate our own commitment to a safe workplace by:

- Working safely and in a way that keeps others safe.
- Not taking shortcuts or putting business objectives ahead of health, safety and wellbeing.
- Taking responsibility to stop unsafe work that cannot be carried out safely.
- Believing that all incidents are preventable.
- Meeting or exceeding legislative and other requirements for health and safety.
- Working together to continuously improve health, safety and wellbeing outcomes for our people and others impacted by our activities.

Some elements of Public Trust's business are inherently more risky than others. We have employees visiting unoccupied homes, employees working on farms and employees travelling significant distances to meet customers. Regardless of your role at Public Trust, you must familiarise yourself with the specific health and safety requirements for that role, and importantly, ensure that all incidents are accurately reported.

What does this mean for you?

- You are responsible for your own safety and the safety of your colleagues and our customers.
- You must comply with appropriate safety laws and follow the safety procedures and requirements of your role.
- You must immediately report hazards or incidents and near misses that are a risk to your own safety or to that of your colleagues or our customers, including any accident, injury, illness or health conditions.

More information is available in our [Health and Safety and Wellbeing system](#)

Financial and business integrity

Te pono ahumoni me te pakihi

Gifts and hospitality Ngā koha me te manaaki

We are supportive of employees receiving gifts or hospitality as part of normal business relationships or cultural practice. We must never be influenced or be seen to be influenced by gifts or hospitality when deciding on a business decision or outcome. These actions can create conflicts of interest or raise questions about our judgement.

What does this mean for you?

- Seek approval from your leader before attending an event or function. Declare all gifts or hospitality over the value of \$50.
- Your leader will decide whether you can keep the gift yourself or if you'll need to share it with the team. They may also decide that it should be returned to the person who gave it to you or donated to a charity.
- Avoid accepting gifts that may be seen to cause a conflict of interest or raise questions about our judgement.
- If you are unsure about the value or nature of a gift or event that you've been invited to attend, it's better to declare it and be cautious rather than caught out.

More information is available in our [Employee Gifts and Functions Policy](#).

Travel and expenses Ngā haerenga me ngā utu haerenga

Travel for business purposes must be justifiable and should be the most economical and efficient for the circumstances.

What does this mean for you?

- Only travel for business when there is a genuine need to so. Leader approval is required for domestic travel prior to booking travel, as outlined in our Business Management Delegations. For international travel, approval from the CEO is required.
- Travel bookings must be made through one of Public Trust's travel arrangers.

More information is available in our [Travel Policy and our Expense Claims Policy](#).

Fraud awareness and reporting Te aroā me te rīpoata i ngā mahi tinihanga

Fraud is a deliberate act which involves the use of deception or opportunity to gain advantage from a position of trust or authority. Employees should be aware that Public Trust has proactive policies and procedures aimed to minimise or prevent actual or potential fraud (such as employee vetting, independent system reviews, internal control frameworks, etc).

What does this mean for you?

- If you are aware of fraud, or suspect fraud, report it to your immediate leader, to the Chief Legal & Risk Officer or the CEO.

If you don't feel comfortable addressing any form of fraud or suspected fraud and feel there isn't anyone you can go to – you can call our confidential and impartial Safe to Speak hotline [Report it Now](#).

Whistleblowing policy Te ture whāki kōrero muna

In the event that an employee becomes aware of serious wrongdoing by another Public Trust employee, they may make a 'protected disclosure' in accordance with the Protected Disclosure Act 2000. This is commonly known as 'Whistleblowing'. Whistleblowers are protected from civil or criminal liability and from unfavourable treatment.

What does this mean for you?

- Report serious wrongdoing using our independent Safe to Speak option [Report it Now](#). Your submission can be completely anonymous if you choose.
- Make the approach in person, by telephone or in writing in accordance with the Protected Disclosures (Whistleblowing) Policy.

More information is available in our [Protected Disclosures \(Whistleblowing\) Policy](#).

Anti-money laundering Aukati mahi horoi moni

The [Anti-Money Laundering and Countering Financing of Terrorism \(AML/CFT\) Act 2009](#) and Automatic Exchange of Information (AEOI) regulations require Public Trust to be proactive in assessing and managing our money laundering/financing terrorism (ML/FT) risks. Money laundering refers to the process of legitimising 'dirty' money and assets gained through illegal activity.

The core of our obligations relate to knowing our customers, and ensuring we do not assist them in ML/FT activities. We do this by:

- Collecting, verifying and storing identification, addresses, sources of wealth/funds and tax details of customers and associated persons.
- Monitoring and reporting suspicious transactions.
- Keeping appropriate records to allow us to track customer interactions and transactions.

All employees with customer interactions are required to undertake AML/CFT training and ensure they act consistently with Public Trust's full suite of policies to mitigate ML/FT risks.

What does this mean for you?

- Remember that money laundering or the financing of terrorism can occur in seemingly innocuous situations.
- Always be alert to suspicious circumstances or behaviour, and report suspicious transactions.
- Where required, ensure customer identity is verified in accordance with Public Trust policy.

More information is available in our [Customer Due Diligence and Associated Tax Information Policy](#).



STATE SERVICES COMMISSION
Te Kōmihana o Ngā Tari Kāwanatanga

STANDARDS OF INTEGRITY & CONDUCT

A code of conduct issued by the State Services Commissioner under the State Sector Act 1988, section 57

WE MUST BE FAIR, IMPARTIAL, RESPONSIBLE & TRUSTWORTHY

The State Services is made up of many organisations with powers to carry out the work of New Zealand's democratically elected governments.

Whether we work in a department or in a Crown entity, we must act with a spirit of service to the community and meet the same high standards of integrity and conduct in everything we do.

We must comply with the standards of integrity and conduct set out in this code. As part of complying with this code, our organisations must maintain policies and procedures that are consistent with it.

For further information see www.ssc.govt.nz/code

FAIR

We must:

- treat everyone fairly and with respect
- be professional and responsive
- work to make government services accessible and effective
- strive to make a difference to the well-being of New Zealand and all its people.

IMPARTIAL

We must:

- maintain the political neutrality required to enable us to work with current and future governments
- carry out the functions of our organisation, unaffected by our personal beliefs
- support our organisation to provide robust and unbiased advice
- respect the authority of the government of the day.

RESPONSIBLE

We must:

- act lawfully and objectively
- use our organisation's resources carefully and only for intended purposes
- treat information with care and use it only for proper purposes
- work to improve the performance and efficiency of our organisation.

TRUSTWORTHY

We must:

- be honest
- work to the best of our abilities
- ensure our actions are not affected by our personal interests or relationships
- never misuse our position for personal gain
- decline gifts or benefits that place us under any obligation or perceived influence
- avoid any activities, work or non-work, that may harm the reputation of our organisation or of the State Services.

newzealand.govt.nz

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STATE SERVICES COMMISSION
Te Kōmihana o Ngā Tari Kāwanatanga

NGĀ PAEREWĀ MŌ TE NGĀKAU TAPATAHI ME TE WHANONGA

He tikanga kawē i tukuna e te Kai-kōmihana o Ngā Tari Kāwanatanga i raro i te Ture Rāngai Kāwanatanga, wāhanga 57

NGĀ PAEREWĀ MŌ TE NGĀKAU TAPATAHI ME TE WHANONGA

Ko tā tātau me tika, me tōkeke, me takohanga me matatika hoki.

He maha ngā tari whakahaere o te Kōmihana o Ngā Tari Kāwanatanga, me ō rātau mana ki te mahi i ngā mahi a ngā kāwanatanga pōti o Aotearoa.

Ahakoā tātau ka mahi i roto i tētahi tari, hinonga Karauna rānei, i roto i a tātau mahi me ū ki te wairua ratonga ki te hāpori me te whakatutuki i ngā paerewa o te ngākau tapatahi me te whanonga i roto i ā tātau mahi katoa.

Me ū tātau ki ngā paerewa o te ngākau tapatahi me te whanonga i roto i tēnei tikanga. Mō te ū ki tēnei tikanga, me pūmau ō tātau tari whakahaere ki ngā kaupapa me ngā tikanga whakahaere e hāngai ana ki tērā.

Mō ētahi atu pārongo tirohia www.ssc.govt.nz/code

TIKA

Ko tā tātau:

- kia tika, me te whakaaro nui hoki ki ngā tāngata katoa
- me ngaio me whai urupare hoki
- me mahi kia whai wāhi mai me te whai take anō o ngā ratonga kāwanatanga
- me whakapau kaha ki te whakarerekē i te oranga o Aotearoa me ōna tāngata katoa.

TŌKEKE

Ko tā tātau :

- me noho kūpapa tonu i roto i ngā take tōrangapū kia pai ai te mahi tahi me ngā kāwanatanga o te rā me ērā e whai mai.
- me whakahaere i ngā mahi a ō tātau tari whakahaere, ahakoā ō tātau ake whakapono
- me tautoko i tō tātau tari whakahaere ki te whakarato i ngā tohutohu whai take, tōkeke hoki
- me whakaaro nui ki te mana o te kāwanatanga o te rā.

TAKOHANGA

Ko tā tātau:

- me hāngai ā tātau mahi ki te ture, me te tōkeke hoki
- me āta whakamahi i ngā rauemi ā te tari whakahaere, ka mutu mō ngā kaupapa tōtika anake
- kia tika te tiaki i ngā pārongo me te whakamahi anō mō ngā kaupapa e hāngai ana
- me mahi ki te whakapakari i te mahinga me te kaha o te tari whakahaere.

MATATIKA

Ko tā tātau:

- me pono
- me mahi ki te taumata o ō tātau kaha
- kia kaua e pā mai ōu ake hiahia, hononga hoki ki roto i ō mahi
- kia kaua e whakaae atu ki ngā takoha, ohaoha rānei e here i a tātau, e riro ki ngā hiahia rānei a tētahi
- kia kaua e uru ki ngā kaupapa e tukino ai i te mana o te tari whakahaere, o Te Kōmihana o Ngā Tari Kāwanatanga rānei, ahakoā mahi, mahi rānei i te waho o te tari.

Te Kāwanatanga o Aotearoa

Te rā tuku ISBN: 978-0-478-30312-4



Declaration Form

Puka Tauākī

Please complete this form to acknowledge that you have received a copy of the Public Trust Code of Conduct and have read and understood it.

Declaration

I acknowledge that I have been given a copy of the Public Trust Code of Conduct and I have read and understood these documents and all the related policies contained within it.
I agree to comply with all relevant provisions.

Please sign the declaration and return to Ask HR.

Please also retain a copy of the whole document for your personal records.

Employee
(full name)

Signed

Position

Date

0800 371 471
info@publictrust.co.nz
publictrust.co.nz