

Conflicts of Interest Policy

1. Purpose

1.1 The purpose of this policy is to:

- Clarify what a conflict of interest is, and the different types of conflicts;
- Outline AT's principles and expectations with respect to conflicts of interest; and
- Provide guidance on how to disclose and manage conflicts of interest.

2. Scope

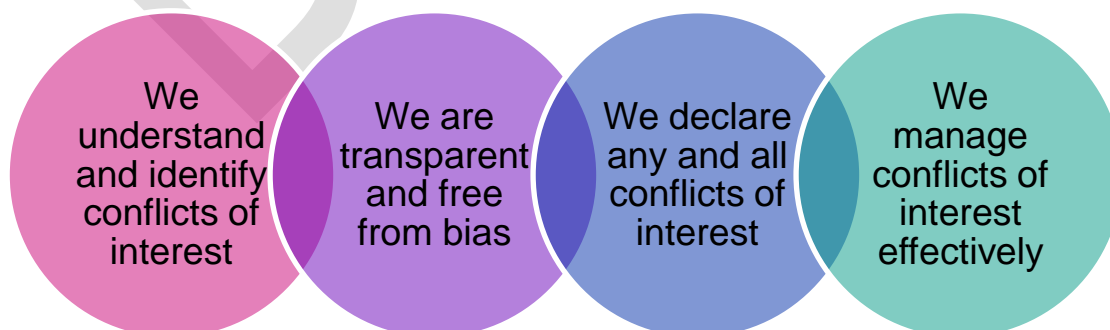
2.1 This policy applies to:

- All AT employees;
- AT representatives, including (but not limited to):
 - Contractors & consultants
 - Agency temps
 - Staff on secondment from other organisations/agencies
 - Volunteers
- AT Board Directors

References to "AT Staff", "you", "we", "our" or other collective nouns relates to anyone listed above.

3. Policy principles

3.1 Our key principles related to the Conflicts of Interest are outlined below:



Why are conflicts of interest something that need to be declared and managed?

- 3.2 New Zealand is a small place, and conflicts of interest are commonplace. Having a conflict of interest does not necessarily mean you have done anything wrong. If the conflict is handled well, it does not have to be a problem.
- 3.3 AT is a public organisation which uses public funds and makes decisions for the ultimate benefit of the public. Members of the public rightly expect that AT's decisions:
- a) are made impartially and for the right reasons;
 - b) are not influenced by personal interests or ulterior motives;
- 3.4 This means that you need to be able to:
- a) understand and identify the different interests you have;
 - b) recognise if there might be a conflict, and how serious it might be for you and AT; and
 - c) understand how to disclose your conflicts of interest and what to do about it.
- 3.5 If a conflict of interest is not properly managed, there is a risk that you will be seen to be advancing your own personal interest, or the interest of others close to you, rather than what is best for AT and the wider public interest.
- 3.6 Even if you have no intention of acting improperly, or think that you can act impartially, **if it looks like** you might be influenced by personal interests, it risks undermining public confidence in the integrity of the decision and may negatively impact AT's reputation.
- 3.7 At its most extreme, a failure to manage conflicts of interest appropriately can also facilitate corruption. Corrupt conduct can arise when a conflict of interest is intentionally concealed, mismanaged, or abused. Most forms of corruption involve a conflict of interest.
- 3.8 Our principles are explained in more detail below. By following these principles, you help to ensure that the public has trust and confidence that AT's decisions are made with integrity and impartiality.

We understand and identify conflicts of interest

What is a conflict of interest?

- 3.9 A conflict of interest is any situation where your duties or responsibilities as an AT employee conflict, or could be seen to conflict, with some other interest you (or someone close to you) might have in your private life. The interest could relate to a relationship with someone (e.g. partner, friend, whānau), another role or activity you undertake outside of work, or a business or financial interest.
- 3.10 Having a personal interest, on its own, is not what causes a conflict. Everyone has multiple roles and interests - at work, at home, in their extended families, or in the community. A potential conflict of interest arises only where your personal interests overlap or conflict with your duties or responsibilities as AT Staff.
- 3.11 For example, if you're a keen baker and belong to a baking community interest group, it is not likely to conflict with your duties at AT. However, if (for example) you belong to a cycling community group which lobbies organisations such as AT then there may be a conflict of interest that needs to be declared and managed.
- 3.12 Conflicts of interest can arise in a wide variety of ways. In all cases, the underlying concern is the same – that is, ensuring that decisions are made impartially, and managing the risk of bias, or the appearance of bias.

A keen baker in a community baking group is less likely to conflict with their AT role than a keen cyclist who is a member of a cycling advocacy group.



Different types of conflicts of interest

- 3.13 Most conflicts of interest can be considered financial or non-financial:
- a) A **financial conflict of interest** is any situation where you (or someone close to you) stand to gain or lose financially from a decision that AT is making.
 - i. For example, a decision could affect the value of something that you own, such as shares, a business, or land.
 - ii. They may be direct or indirect – if someone close to you has a financial interest in a decision AT is making, then a financial conflict of interest exists.
 - iii. There is a presumed bias with financial conflicts of interest, so they need to be managed appropriately.
 - b) A **non-financial conflict of interest** is any situation where you are not affected financially by a decision but are affected in some other way that might make you biased or appear to be biased.
 - i. Non-financial conflicts may arise from (for example) family relationships, friendships, or any other sort of personal relationship.
 - ii. They can also arise if you are a member of or involved with an organisation outside of AT which might overlap with AT's roles and responsibilities.
- 3.14 There are other situations or circumstances which may also give rise to conflicts of interest. For example:
- a) Secondary employment may not directly overlap with your AT role, but it may impact your working hours, ability to work effectively, or use AT resources.
 - b) Something you may have said or been involved in may lead others to think that you have made up your mind before considering all the evidence. This is called **predetermination** and can lead to risks around bias.
 - c) Our roles at AT means that we may have access to official or confidential information. How we use and share such information could create conflicts of interest – for example sharing it with someone we are close to or using the information to make personal decisions.
- 3.15 Sometimes, a conflict may not fall neatly into one category. There may also be situations where there is more than one type of conflict involved. The above categories can be used as a guide to help you to better understand the type of situations which may give rise to a conflict of interest. If you're not sure feel free to contact AT's [Conflicts of Interest Specialist](#). And remember – **if in doubt, declare**.
- 3.16 Check out [Appendix 1](#) to this policy for examples of different conflicts of interest.

Actual, potential or perceived conflicts of interest

- 3.17 It is important to know that it is not just actual, existing conflicts that pose a risk to you and to AT. Potential conflicts and perceived conflicts of interest should also be declared and managed appropriately.
- 3.18 A *potential* conflict of interest is a personal interest which does not currently overlap with your AT role, but may do so in the future. For example, you may be part of an organisation or community group that does not currently have any involvement with AT, but may do so in the future.

Potential conflict example:

Your father is a civil engineer and has started his own consulting business. His business isn't an AT supplier but may be in the future.



- 3.19 A *perceived* conflict of interest is a situation where there may not be an actual conflict of interest, but to an outside observer it could look like there is.
- 3.20 Members of the public or other people do not often have access to all the relevant facts – they can only judge by appearances and information in the public domain. That means perceived conflicts are often as risky as actual conflicts, and you need to take just as much care to identify and manage them.

Perceived conflict example:

Your spouse works for a professional services firm which is a supplier to AT, but they work in the marketing team and have no involvement with customers like AT.

Key questions to ask when considering conflicts of interest

- 3.21 Here are a few questions you may wish to ask yourself when considering what conflicts of interest you may have that need to be declared and managed:
- a) Could you, someone close to you, or an organisation you are involved in stand to gain from decisions you make in your role at AT?
 - b) Are you, someone close to you, or an organisation you are involved in likely to be affected by decisions you make in your role at AT?
 - i. How close is your relationship to the person or organisation?
 - ii. Will they be directly affected by the decision?
 - iii. How seriously or significantly will they be affected?
 - c) Is there a risk that you could be seen to be biased in your decision because of a relationship or association you have?
 - d) Is there anything you have previously done or said that might make people think you are not going to listen fairly to all the relevant information before making a decision?

We are transparent and free from bias

- 3.22 At its core, AT is a public organisation which uses public money to make decisions for the ultimate benefit of the public.
- 3.23 In order to *Tiaki for Tāmaki Makaurau* AT needs to demonstrate that it exercises its powers in a transparent, impartial and trustworthy way.
- 3.24 Members of the public rightly expect that the people making those decisions are acting impartially, without any possibility of influence from personal interests, favouritism, or private benefit.
- 3.25 By being open and honest about our conflicts, we help to provide assurance to the public and our stakeholders that we are trustworthy, and that our decisions have been made in a transparent and impartial manner.
- 3.26 There is heightened sensitivity around the use of public funds, and if conflicts of interest are not disclosed or managed correctly there can be significant negative impacts to AT's trust, confidence and reputation.
- 3.27 If a conflict of interest is not properly managed, there is a risk that you will be seen to be advancing your own personal interest, or the interest of others close to you, rather than to your the wider public.
- 3.28 AT Staff need to be mindful that perceived conflicts of interest are just as important to disclose as actual conflicts. From the public's perspective, there is often very little difference between an actual conflict of interest and a perceived one, so the impacts on AT's reputation can be the same.



- 3.29 It is also important to be transparent about all types of conflicts of interest, even if you have no intention of acting improperly, or think that you can act impartially. Remember, **if it looks like** you might be influenced by personal interests, it risks undermining public confidence in the integrity of the decision, and may negatively impact AT's reputation.
- 3.30 While AT Staff have the same rights as others of political and social expression outside of the workplace (for example, on social media, or being involved in political parties, community groups or advocacy groups), if you are expressing yourself or involved in such groups you need to ensure that it is clear that it is in a personal capacity and is not related to AT. This means:
- not wearing or using any AT branding such as uniforms, logos, lanyards, or other items that identify you as an AT employee;
 - not participating during working hours (unless expressly permitted by your People Leader to do so);
 - not sharing any information or advice from AT that is not already in the public domain; and
 - not using any of AT's resources.
- 3.31 There is also a risk that participation in such groups may lead to a perception of bias or pre-determination (see paragraph 3.14b), depending on the nature of the decision. This should be taken into consideration.
- 3.32 Being transparent and free from bias is also part of the core principles of AT's [Gifts and Hospitality Policy](#). You should note that certain gifts or hospitality may create conflicts of interest if they are accepted, as they can create a sense of obligation that may compromise impartial and honest decision making.
- 3.33 At its most extreme, a failure to manage conflicts of interest appropriately can also lead to corruption. Corrupt conduct can arise when a conflict of interest is intentionally concealed, mismanaged, or abused. Most forms of corruption involve a conflict of interest, and AT has zero tolerance towards any instance of fraud or corruption.
- 3.34 Not disclosing a conflict of interest or understating its significance can therefore pose a significant risk to AT and you personally. If you have any concerns regarding:
- instances of conflicts of interest which you believe are not being appropriately declared or managed;
 - fraud; or
 - corruption
- you should raise them through AT's [Speak Up form](#), or by contacting the [Investigations team](#) directly. More information can be found in AT's [Speak Up Hub](#).



We declare any and all conflicts of interest

- 3.35 **If in doubt, declare.** This is AT's general rule when it comes to declaring conflicts of interest.
- 3.36 It is safer to disclose too much, than it is to disclose too little. There are few (if any) downsides to disclosing actual, potential or perceived conflicts of interest. However, there are risks to AT's reputation and your own if you do not disclose something which later becomes relevant.

What should be disclosed?

- 3.37 Any conflict of interest – whether actual, potential or perceived - should be disclosed. You should discuss your conflicts of interest openly and honestly with your People Leader, using this policy as a reference document.
- 3.38 Disclosing our conflicts of interest helps to promote transparency and openness, and builds trust and confidence with the public that AT's decisions are being made in a fair, impartial way.
- 3.39 AT expects certain interests to be disclosed by AT Staff, irrespective of whether they believe there is a conflict of interest or not. This includes:
- a) any secondary employment, contracting or consulting work, irrespective of whether you think it overlaps with your role at AT; or
 - b) any **personal relationship** (e.g. partner, family member) that you have with:
 - i. someone else at AT; or
 - ii. someone who works for an existing (or potential) AT supplier or subcontractor; or
 - iii. someone who works for Auckland Council, a CCO, or Waka Kotahi/NZTA;
- 3.40 There are certain activities and procedures in AT which also require those involved to disclose any personal interest or relationship with any parties involved – for example:
- a) procurement activities (check out the [Procurement Conflict of Interest Guide](#));
 - b) recruitment;
 - c) when making decisions around funding or sponsorship to third parties;
 - d) any decision involving AT's regulatory functions or powers.
- 3.41 You need to use your judgement and consider the principles of this policy when deciding what to disclose.
- 3.42 Not disclosing a conflict of interest or understating its significance can pose a significant risk to AT and you personally. It will be treated seriously and may lead to further disciplinary action in accordance with this policy and AT's [Code of Conduct Policy](#) (see [Non Compliance](#) below).
- 3.43 Depending on the nature of the conflict of interest, further steps may need to be taken to make sure that the conflict is managed effectively. In some circumstances, it may be that the conflict only needs to be disclosed for transparency and caution, and no further action will be necessary. This is something that can be determined in discussion with your people leader.

Remember that it is important to disclose anything that others might perceive as a conflict too.

When do I disclose a conflict of interest?

- 3.44 You should disclose an actual, potential or perceived conflict of interest as soon as you become aware of the conflict of interest.
- 3.45 Remember that circumstances can change over time, and you should update your conflict of interest declaration if anything changes that you think should be declared. For example:
- a) a close friend, relative or partner may change jobs and start working for one of AT's suppliers or subcontractors; or
 - b) your personal relationship with someone who is a supplier or subcontractor to AT may strengthen to a point where it may affect, or others might think it could affect, your impartiality.
- 3.46 AT requires that you disclose all conflicts of interest, whether they are actual, potential or perceived:



- a) When you first start with AT (within the first 90 days).
 - b) At the end of every year, as part of the annual declarations process.
 - c) As soon as you become aware of a conflict of interest.
- 3.47 There may be other times where you are required to complete a conflict of interest declaration, as part of AT's standard business processes – for example as part of a procurement or recruitment process.
- 3.48 In respect of the annual conflict of interest declaration process:
- a) this usually occurs between November and January of each year.¹
 - b) Announcements will be made leading up to and during the annual declarations process using AT's usual communications channels (such as the Engine Room and staff emails).
 - c) People leaders need to remind their staff of the annual declarations requirement and its importance.
 - d) You should discuss your annual declarations with your People Leader and agree on appropriate strategies to manage your declared conflicts (see [We manage conflicts of interest effectively](#) below)
- 3.49 Failing to complete a declaration or fully disclose a conflict of interest is a breach of this policy and may be subject to further disciplinary action (see [Non Compliance](#) below).

How to disclose conflicts of interest

- 3.50 Completing a declaration is easy, and usually only takes a few minutes.
- 3.51 Use the [Submit my Declaration of Interest](#) form, located in Pa Mai to complete a declaration. The declaration will be sent to your manager automatically for approval.
- 3.52 The form contains a set of questions to help guide you to make the necessary declarations about your conflicts of interest. The information contained in this policy should also be used to inform your decisions about what to declare.
- 3.53 If you answer yes to any of the questions in the declaration, you will also be asked how the conflicts will be managed.

We manage conflicts of interest effectively

- 3.54 Managing conflicts of interest is just as important as declaring them - to be able to demonstrate that we are transparent and free from bias we need to make sure that our conflicts of interest are being managed appropriately.
- 3.55 Once a conflict has been identified, steps need to be taken to remove any possibility – or perception – that the conflict of interest may have had an effect on the decision or outcome.
- 3.56 This is not just the responsibility of the person who has the conflict of interest. People Leaders are also responsible for reviewing any conflict of interest and assessing the management strategy to ensure that it is effective and fit-for-purpose. Any other people involved should also be confident that the risks around a conflict of interest have been effectively managed.
- 3.57 When deciding how to manage a conflict of interest, AT Staff need to consider how outside observers might perceive the situation. It is important to remember that as an organisation we are trying to demonstrate impartiality and transparency, and members of the public don't always have all the relevant facts.

¹ You don't need to complete an annual declaration if you already completed one after 1 September.



3.58 When deciding how to manage a conflict, we also need to assess:

- a) the level of seriousness of the conflict of interest;
- b) the level of risk that the conflict gives rise to; and
- c) what mitigation options are available.

Assessing the seriousness and risk of a conflict

3.59 How serious a conflict of interest is, is a question of degree. It relates to the directness and significance of the conflict – how close and how big. Directness is about how close and how specific the two interests (i.e. professional and personal) are, while significance is about the magnitude of the potential effect of one on the other.

3.60 You should consider things like:

- a) the type, or size, of the personal interest;
- b) the nature or significance of the decision or activity AT is carrying out;
- c) the extent to which the personal interest(s) could specifically affect or be affected by the decision or activity;
- d) the nature or extent of the person's involvement in AT's decision or activity.

3.61 The same factors are likely to be relevant to considering the risk that the conflict gives rise to. The more significant the personal interest, or decision or activity AT is carrying out, the greater the risk.

3.62 When assessing the risk, it is important to remember that it is not just about the risk that misconduct may occur. It is about the seriousness and significance of the conflict, and the potential perception that this conflict might create to others. Even if you believe that your conflict wouldn't affect your impartiality, there could still be a risk because of the perception the conflict creates.

Determining the best conflict of interest management strategies

3.63 There are different options available to manage a conflict of interest, and it will depend on the nature of the conflict as to which option is most appropriate to use.

3.64 Assessing which option(s) to use is a question of judgement, and it's not always straightforward. Remember that AT has a [Conflicts of Interest Specialist](#), who can provide support and guidance on management strategies.

3.65 The objective when managing conflicts of interest is to demonstrate that a conflict of interest does not have any effect on any decisions made. This can usually be achieved by ensuring there is separation between the conflict of interest and whatever decision needs to be made.

3.66 At a high level, options for managing conflicts of interest include the following separation measures:

- a) **Restricting** a person's involvement (e.g. limiting a person's involvement in a procurement where a conflict exists);
- b) **Recruiting** an independent person (e.g. Probity) to oversee the decision process and verify it was done without bias;
- c) **Removing** the conflicted person from the decision or activity (e.g. a procurement).

3.67 Examples of how these separation measures could be applied are shown below. They are listed roughly in order of lowest to highest severity:

- a) taking no action (after carefully considering seriousness of the conflict and the level of risk)



- b) asking all affected parties whether they agree to the person's involvement (note this will not be possible for decisions that affect the public)
 - c) seeking formal exemption to allow participation (if such a legal power applies)
 - d) imposing additional oversight or review
 - e) withdrawing from discussing or voting on a particular item of business, or taking other steps to limit influence or decision-making (e.g. advice only)
 - f) exclusion from the committee or working group dealing with the issue
 - g) re-assigning tasks or duties to another person, or agreement not to do something
 - h) withholding certain confidential information or information that relates to the conflict
 - i) placing restrictions on access to information
 - j) transferring the person (temporarily or permanently) to another position or project
- 3.68 The most common and simplest approach is for the conflicted person to withdraw or be excluded from the matter. This is the recommended approach whenever it is possible to do so.
- 3.69 Occasionally a conflict of interest might be so significant or pervasive that the person may need to consider giving up one interest or role (for example, if an AT employee was considering running for election to a Local Board). However, these situations are uncommon.
- 3.70 Alternatively, after assessing the seriousness and risk of the conflict of interest it might be that it is considered sufficiently indirect or insignificant, and that formally declaring and recording the conflict of interest is the only action that is required. Before such an approach is taken, it is important to consider the public's perception of the conflict and how the situation might look to an outside observer – there may still be a risk of damage to AT's reputation that needs to be managed.
- 3.71 When circumstances change with a conflict of interest, the way in which it is managed may also need to be reassessed.
- 3.72 Often situations are not clear-cut, and a range of possible judgements and management options could be reasonable. AT Staff need to keep the principles of transparency and freedom from bias central to decisions made about conflicts of interest. *It is always safer to take a more cautious approach.*
- 3.73 It is important to clearly document any decision made about a conflict of interest and how it is to be managed. This helps to protect you and AT from reputational risk. As noted above, further information on managing conflicts can be provided with a [conflict of interest declaration](#). In approving a declaration, it is expected that People Leaders carefully consider the management strategy with their staff and ensure that it aligns with this policy and sufficiently minimises the risks to AT and our people.
- 3.74 There may also be separate disclosure and documenting requirements for key AT processes, such as procurements. You should follow the guidance available for those processes (as well as this policy).
- 3.75 If you are not sure about how to manage a conflict of interest situation, reach out to our [Conflicts of Interest and Investigations Specialist](#).



4. Definitions

Term	Definition
AT Staff	References to anyone listed below: <ul style="list-style-type: none"> • AT employees (fixed and permanent); • AT representatives, including (but not limited to): <ul style="list-style-type: none"> ○ Contractors & consultants ○ Agency temps ○ Staff on secondment from other organisations/agencies ○ Volunteers • AT Board Directors
Conflict of Interest (Col)	<p>Any situation where your duties or responsibilities as an AT employee conflict, or could be seen to conflict, with some other interest you (or someone close to you) might have in your private life. The interest could relate to a relationship with someone (e.g. partner, friend, whānau), another role or activity you undertake outside of work, or a business or financial interest.</p> <p>Conflicts of interest can be <i>actual</i> (the conflict exists now), <i>potential</i> (a conflict may exist in the future), or <i>perceived</i> (others might view a relationship as a conflict).</p> <p>See We understand and identify conflicts of interest and Appendix 1 for more information and examples of conflicts.</p>
Corruption Corruption (continued)	<p>Corruption is the lack of integrity or honesty, or the use of a position of trust for a dishonest gain – either to oneself, another person or entity, or AT (directly or indirectly). Examples of corrupt conduct include (but are not limited to):</p> <ul style="list-style-type: none"> • Bribery – both domestic and foreign • Coercion; • Destruction, removal or inappropriate use or disclosure of records, data, materials, intellectual property or assets; • Accepting or seeking anything of material value from contractors, vendors or persons providing services to AT; • Secret commissions (kickbacks); • Manipulating tendering processes; • Undisclosed conflicts of interest; • Undisclosed gift giving or corporate hospitality that falls outside the levels outlined in AT’s Gifts and Hospitality Policy; • A member of the public influencing or trying to influence, a public official, employee, contractor, person seconded to AT, or any other party that has a business involvement with AT to use his or her position in a way that is dishonest, biased or breaches public trust; • Any similar or related inappropriate conduct.
Personal relationship	<p>A relationship that exists between people who share a bond of affection, care, or concern. The bond can be from a family relationship, intimate relationship (e.g. spouse), or other sort of relationship.</p> <p>A personal relationship has a stronger bond than other relationships that might be considered ‘acquaintances’, who you might see occasionally but don’t have a meaningful personal connection with.</p>



Pre-determination	A situation where there is a risk that someone may be perceived to be biased, or has already made up their mind on a matter. This usually arises because of something that has previously been said or done (e.g. commenting in a public forum on social media).
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5. Roles and responsibilities

Role	Responsibility
All AT Employees and Representatives	<ul style="list-style-type: none"> Adherence and compliance with this policy
All People Leaders	<ul style="list-style-type: none"> Promote the principles of this policy. Ensure all employees and representatives have completed their Declaration of Interest. Notify applicable personnel of the requirements of the policy. Review and approve management strategies for conflicts of interest, in line with this policy.
Policy Owner – Head of Risk & Legal	<ul style="list-style-type: none"> Develop, consult, seek approval of, and implement the Conflict of Interest Policy for AT. Guide/approve system development to support policy. Administer the requirements of this policy. Monitoring and updating of this policy.
Policy Contact – Manager Compliance	<ul style="list-style-type: none"> Review and report on the conflicts of interest to the Executive Leadership team and Board, where necessary. Administer requirements of the policy. Monitoring and updating of this policy.
Conflicts of Interest Specialist	<ul style="list-style-type: none"> Provide support and guidance on conflict of interest management strategies. Maintain the conflict of interests register. Co-ordinate and facilitate declaration of interest process.



6. Non-compliance

- 6.1 Failure to follow the principles of this policy may lead to increased scrutiny and negative publicity for individuals and Auckland Transport's reputation.
- 6.2 Full compliance with this policy is required. Non-compliance or breaches of the policy – such as intentionally failing to declare, understating, or mismanagement of conflicts of interest – may lead to disciplinary action being taken in accordance with AT's [Code of Conduct Policy](#) (up to and including dismissal), or the termination of a representative's agreement/arrangement with AT.

7. Supporting information

Legislative compliance	This Policy supports Auckland Transport's compliance with the following legislation: <ul style="list-style-type: none">• Employment Relations Act 2000• Protected Disclosures (Protection of Whistleblowers) Act 2022
Related documents <i>These are documents that relate to, but do not directly support, this Policy. This may include other Auckland Transport Policies, Standards, Procedures and Guidelines, or external materials such as regulatory codes and standards.</i>	<ul style="list-style-type: none">• Code of Conduct• Gifts and Hospitality Policy, Procedure and Guidelines• Procurement Policy• Fraud Policy• Protected Disclosures Policy• Managing conflicts of interest: A guide for the public sector

8. Approval & review

Policy Owner:

Head of Risk & Legal

Policy Contact:

Manager Compliance

Endorsed by:

Chief Executive

Approved by

Auckland Transport Board

Approval date:

Next Review date:

Effective date:

AT reserves the right to review, amend or add to this policy at any time upon reasonable notice to employees and representatives.



Appendix 1 – Examples of conflicts of interest

Below are examples of situations that may give rise to a conflict of interest. It is not a complete list – these examples should serve as a guide to help you determine what conflicts of interest you may have, and what should be declared and managed in accordance with this policy.

If you are not sure about whether something may be a conflict of interest, please reach out to AT's [Conflict of Interest Specialist](#).

Examples of Conflicts of Interest are below. These situations may apply to you, or someone close to you (e.g. a partner, whanāu or friends). They could be actual, potential, or perceived:

- holding another role in an organisation (e.g. secondary employment);
- having a financial interest in an AT supplier or subcontractor (e.g. shares or investments);
- a personal relationship (e.g. family, partner, close friend) with someone who works for:
 - AT,
 - a supplier or subcontractor, or
 - a stakeholder (e.g. Auckland Council or NZTA/Waka Kotahi),
- being a member of a club, society or other organisation which may be influenced or affected by AT's activities;
- having an obligation to someone else (e.g. a trustee);
- owing a debt to someone else who works at AT, a supplier or subcontractor, or stakeholder;
- being specifically/personally impacted or affected by AT decisions;
 - This does not apply to AT decisions that affect everyone, e.g. raising PT fares.
- participating in political or social campaigning that may relate to AT decisions or activities;
- having a personal relationship with an applicant of a recruitment process

