

AGENDA ITEM 17.2   BOARD DECISION PAPER	
То:	The Board
From:	Ryan Marshall, Compliance Manager
Reviewed:	Kerry Bakkerus, Head of Risk and Assurance Dean Kimpton, Chief Executive Officer
Date:	19 August 2025
Title:	Tier 1 Policies

#### **Aronga / Purpose**

- 1. To seek approval of the Protected Disclosures Policy.
- 2. To seek approval to reclassify the following polices from Tier 1 (board approved) to a Tier 2 (Chief Executive-approved):
  - Recruitment, Selection and Appointment Policy.
  - Leave Policy.
  - Treasury Management Policy.

#### **Tuku mana / Delegation**

3. Tier 1 policies require board approval for updates and reclassifications.

#### Ngā tūtohunga / Recommendations

That the Auckland Transport Board (board):

- a. Approves the Protected Disclosures Policy
- b. Approves the reclassification of the Recruitment, Selection and Appointment Policy from a Tier 1 to a Tier 2 policy.
- c. Approves the reclassification of the Leave Policy from a Tier 1 to a Tier 2 policy.

d. Approves the reclassification of the Treasury Management Policy from a Tier 1 to a Tier 2 policy.

#### Te whakarāpopototanga matua / Executive summary

- 4. The policies have been updated as part of Auckland Transport's (AT's) review cycle of its policies.
- 5. Management recommends reclassifying the Recruitment, Selection and Appointment Policy, Leave Policy, and Treasury Management Policy as Tier 2 policies to be approved by the Chief Executive, since they do not meet the Tier 1 criteria for strategic or high-risk areas.

#### Ngā tuhinga ō mua / Previous deliberations

Date	Policy	Key outcomes
14 August 2025 Finance and Assurance Committee	Protected Disclosures Policy	The committee recommended that the board approves the Protected Disclosures Policy, subject to an amendment that was reviewed by the Committee Chair (see paragraph 11 for further details).
14 August 2025 Finance and Assurance Committee	Recruitment, Selection and Appointment Policy	The committee recommended that the board reclassify the Recruitment, Selection and Appointment Policy from a Tier 1 Policy to a Tier 2 Policy.
14 August 2025 Finance and Assurance Committee	Leave Policy	The committee recommended that the board reclassify the Leave Policy from a Tier 1 Policy to a Tier 2 Policy.
14 August 2025 Finance and Assurance Committee	Treasury Management Policy	The committee recommended that the board reclassify the Treasury Management Policy from a Tier 1 Policy to a Tier 2 Policy.





#### Te horopaki / Background

- AT regularly reviews and updates its policies to ensure that they are fit-forpurpose, reflect leading practice, address key risk areas in the organisation and align to Auckland Council's direction.
- 7. Policies that are strategic in nature, have reputational impact or provide direction on areas of significant risk have been classified as Tier 1 policies. Tier 1 policies are approved by the Board.
- 8. Policies that provide direction on operational matters that impact the entire organisation have been classified as Tier 2 policies and are approved by the Chief Executive.

# Te hononga ki te "Statement of Intent 2024-2027"/ Alignment to Statement of Intent 2024–2027

9. Although AT's policies are not tied to specific principles in the Statement of Intent (SOI), they help manage organisational risks and guide operations, supporting activities that align with the SOI.

#### Me mōhio koe / What you need to know

#### **Protected Disclosures Policy**

- 10. The Protected Disclosures Policy has been simplified, updated to the new template and roles and responsibilities have been revised for clarity. It includes a simplified and improved explanation of what a protected disclosure is and key definitions. A copy of the Protected Disclosures Policy is included as Attachment 1.
- 11. At the Committee's request, management added a section entitled "Our Commitment to you" (highlighted in the policy). It is intended to show the reader the governance and oversight that exists for protected disclosures, and to demonstrate the board's commitment to support individuals who wish to make a protected disclosure.

#### **Recruitment, Selection and Appointment Policy**

- 12. Management proposes transitioning the Recruitment, Selection and Appointment Policy (currently the Recruitment Policy) from a Tier 1 (board approved) to a Tier 2 (Chief Executive-approved) policy.
- 13. 'People' is one of AT's key risks; however, recruitment of staff (and this policy) is considered an operational matter. Therefore, it aligns with the definition of a Tier 2 policy. The updated policy is included as Attachment 2.
- 14. Key elements to note include that the new policy aligns with our new policy style and uses our updated policy template. The policy's principles have been refreshed with a focus on fairness, inclusivity, alignment to AT's recruitment rules, and respect of confidentiality and privacy. A separate Recruitment Procedure has also been created to detail some of the rules and the 'how to' for Recruitment.

#### **Leave Policy**

- 15. AT currently has six different leave policies:
  - a. Annual Leave Policy
  - b. Bereavement and Tangihanga Leave Policy
  - c. Leave Without Pay Policy
  - d. Parental Leave Policy
  - e. Sick and Domestic Leave Policy
  - f. Special Paid Leave Policy.
- 16. The Annual Leave Policy is currently a Tier 1 policy, which requires board approval for any changes. The remaining existing leave policies require Chief Executive approval.
- 17. The revised Leave Policy brings the existing six leave policies into one policy, helping our people better understand the different leave entitlements and requirements.





- 18. Management proposes transitioning the Leave Policy from a Tier 1 (board approved) to a Tier 2 (Chief Executive-approved) policy, due to its operational nature. The updated policy is included as Attachment 3.
- 19. The committee has endorsed the change to Tier 2, considering that management are preparing a new Remuneration and Benefits Policy, which is proposed to be a Tier 1 policy. This policy will refer to annual leave and leave entitlements, which will give the board visibility of the leave entitlements for our people.
- 20. The key changes to the Leave Policy (from the six existing policies) are:
  - a) The Leave Policy uses the updated policy template
  - b) The content of the Leave Policy is largely unchanged from the content in the six existing policies, confirmed by the People & Performance Directorate.
  - c) The Leave Policy has been categorised into different sections, based on the six existing policies with definitions made clearer.

#### **Treasury Management Policy**

- 21. We are proposing that the Treasury Management Policy is shifted from a Tier 1 (board approved) to a Tier 2 (Chief Executive-approved).
- 22. The Treasury Policy is largely operational in nature, and much of it relates to AT's Finance and Treasury functions (as opposed to the wider organisation).
- 23. As AT does not have authority to lend, borrow or acquire financial instruments, Auckland Council operates centralised treasury management and undertakes all treasury activities on behalf of AT.
- 24. The updated Treasury Management Policy is provided as Attachment 4. There have been minor changes to the existing policy:
  - a. The purpose and scope of the policy have been reworded and simplified.
  - b. The new policy template has been used.
  - c. A key terms section has been added.

- d. The core principles of the policy are unchanged from the current policy.
- 25. AT is required to comply with Auckland Council's Treasury Management Policy. For ease of reference, we have provided links to Council's Treasury Management Policy and Treasury Operating Manual inside AT's policy.

# Ngā ritenga-ā-pūtea me ngā rauemi / Financial and resource impacts

26. N/A

# Ka whaiwhakaaro ki te Tiakanga Taiao / Climate change and sustainability considerations

27. N/A

#### Ngā whakaaweawe atu anō / Other impacts

Relationship	Consulted Y/N	Views and Perspectives Received
Māori	Yes: ☐ No: ⊠	N/A
Elected members	Yes: ☐ No: ⊠	N/A
Council Controlled Organisations	Yes: □ No: ⊠	N/A

#### Ā muri ake nei / Next steps

28. If approved by the board, we will publish the final versions of all four policies on AT's intranet and notify AT staff of the changes to the policies in internal communications.





#### Ngā whakapiringa / Attachments

Attachment #	Description
1.	Protected Disclosures Policy
	[Available Through Resource Centre]
2.	Recruitment, Selection and Appointment Policy
	[Available Through Resource Centre]
3.	Leave Policy
	[Available Through Resource Centre]
4.	Treasury Management Policy
	[Available Through Resource Centre]

#### Te pou whenua tuhinga / Document ownership

Submitted by	Recommended by	Approved for submission
Ryan Marshall  Compliance Manager	Kerry Bakkerus  Head of Risk & Assurance	Dean Kimpton Chief Executive
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# Protected Disclosures (Whistleblower) Policy

### 1. What is this policy about?

- 1.1. Auckland Transport (AT) has zero tolerance for any form of wrongdoing and strongly encourages reporting (disclosure) of any suspected instances of wrongdoing.
- 1.2. This policy outlines how we protect our people in line with the Protected Disclosures (Protection of Whistleblowers) Act 2022 (the Act).
- 1.3. By following the principles of this policy:
  - we recognise reporting is highly valued, and people who report wrongdoing help promote integrity, accountability and transparency within AT, and
  - we ensure people who report serious wrongdoing are protected by the Act, and
  - AT remains a safe place to raise concerns.

### 2. Who does this policy apply to?

- 2.1. This policy applies to all current and former AT employees and representatives; and includes contractors, people on secondment, agency temps and interns, volunteers and homeworkers; the AT Board of Directors; and anyone else defined as a 'discloser' in the Act.
- 2.2. Where this policy uses pronouns like "you", "your", "we", or "us", it is referring to anyone listed above who this policy applies to.

#### 3. What is a protected disclosure?

- 3.1. A protected disclosure gives certain protections for people to report serious wrongdoing in or by AT. It means you are protected from retaliation and unfair treatment because of making the disclosure, and you are immune from civil, criminal or disciplinary proceedings in relation to the disclosing of the information. You can read more about the protections you are entitled to under the Act at Section 5 of this policy, and in our Protected Disclosures Procedures.
- 3.2. A disclosure of information is a protected disclosure if the person disclosing the information:
  - believes on reasonable grounds that there is, or has been, serious wrongdoing in or by AT; and
  - discloses information about that in accordance with the Act; and
  - does not disclose it in bad faith (i.e. for dubious motive, such as intimidation).





### 4. What is serious wrongdoing?

- 4.1. Serious wrongdoing has a particular meaning in the Act and includes:
  - an offence: or
  - a serious risk to; public health, public safety, the health or safety of any individual, or the environment; or
  - a serious risk to the maintenance of the law, including the prevention, investigation and detection of offences and the right to a fair trial; or
  - an unlawful, corrupt or irregular use of public funds or public resources; or
  - oppressive, unlawfully discriminatory, or grossly negligent conduct or gross mismanagement by a public sector employee, or a person performing a function or duty or exercising a power on behalf of a public sector organisation (the government).
- 4.2. A disclosure about wrongdoing is unlikely to be a protected disclosure unless it meets one of the above definitions of serious wrongdoing. For example, concerns like dissatisfaction with the leadership of AT or more minor misconduct matters may not amount to serious wrongdoing. It also does not cover employment issues that are more properly covered by the Employment Relations Act.
- 4.3. If concerns about wrongdoing are raised but do not meet the threshold for serious wrongdoing, we will still treat these seriously and where necessary take any appropriate action. You can learn more about raising concerns of wrongdoing on our <a href="Speak Up Hub">Speak Up Hub</a>.

### 5. How am I protected under the Act?

5.1. A person making a protected disclosure is entitled to the following protections.

Protection	Description
	AT must use our <b>best endeavours</b> to keep confidential all information that might identify the person making the disclosure.
	AT has an obligation to consult with the person before and after disclosure of identifying detail.
Confidentiality	There are limited exceptions to this; where the person consents to the release of identifying information; or if there are reasonable grounds to believe that the release of identifying information is essential to:
	enable an effective investigation,
	prevent serious risk of health and safety,
	comply with the principles of natural justice; or
	investigation by a law enforcement or regulatory agency for the purpose of law enforcement.





Protection	Description
Retaliation or unfavourable treatment	AT must not retaliate or threaten to retaliate against a person because the person has made, or intends to make, a protected disclosure.
	If retaliation, the threat of retaliation or unfavourable treatment occurs, the person can take a personal grievance under the Employment Relations Act 2000.
	A person who is treated less favourably than others in the same or similar circumstances may also be able access the anti-victimisation protections in the Human Rights Act 1993. This applies even if the person is not covered by the Employment Relations Act.
Immunity from civil, criminal and disciplinary proceedings	A person who makes a protected disclosure is protected from liability from any civil, criminal or disciplinary proceeding <b>because of making the disclosure</b> .
	This applies even if there is a prohibition or restriction on disclosing information such as in any contract, agreement or internal procedure.
	The Act cannot be contracted out of, so the rights and protections apply even if the person has agreed not to disclose information, for example, under an employment agreement, confidential settlement or non-disclosure agreement.

- 5.2. These protections apply to disclosures made in accordance with the Act and AT's <u>Protected Disclosure Procedure</u>, even if you:
  - · are mistaken and there is no serious wrongdoing, or
  - do not refer to the name of the Act when making the disclosure, or
  - technically fail to comply with some of the Act's requirements (if you have substantially complied with the Act), or
  - make the disclosure to another person (if you do so on a confidential basis, to seek advice about whether or how to make a protected disclosure).
- 5.3. If another person discloses further information in support of a disclosure they are also entitled to protection if they do not disclose in bad faith and they disclose to AT or an appropriate authority in accordance with the Act.

# 6. Circumstances where you are not protected by the Act

- 6.1. You are not protected from action being taken against you if you were **involved in the wrongdoing**.
- 6.2. You are not entitled to protection under the Act if you:
  - know the allegations are false,
  - make the disclosure in bad faith (i.e. for dubious motive, such as intimidation),





- make the disclosure directly to the media or on social media (instead of to the appropriate authority), or
- the information you are disclosing is protected by legal professional privilege.

### 7. How to make a protected disclosure?

- 7.1. To support the information in this policy our <u>Protected Disclosures Procedure</u> provides more detailed information on avenues for disclosure, including internal and external sources for reporting, the procedure once a written disclosure is received and a more comprehensive explanation of protections.
- 7.2. We know it can be difficult to raise concerns; it takes courage, so we have tried to make it easy for you by providing different options and channels to raise concerns as follows:
  - Speak Up Hub provides information and links to support and resources, to help you raise
    concerns, including suspected activities or incidents of fraud and corruption with
    confidence.
  - Dedicated confidential reporting channels.
    - Investigations@at.govt.nz
    - anonymous external whistleblower service AT.report@pwc.com or 0800 287 376

### 8. Our commitment to you

- 8.1. We have a dedicated <u>Investigations team</u>, responsible for ensuring that all disclosures of suspected or actual wrongdoing are triaged and investigated.
- 8.2. AT's Board actively promotes a culture of integrity and wants you to feel safe to raise concerns without fear of retaliation. They are committed to ensuring concerns about serious wrongdoing are managed appropriately, in line with this policy and the Protected Disclosures (Protection of Whistleblowers) Act 2022. To enable this, the Finance & Assurance Committee receive regular, anonymised reports on complaints, disclosures, investigations, and outcomes from Risk & Assurance.
- 8.3. More information and guidance on how to make a disclosure, and who you can disclose to, can be found in our Protected Disclosures Procedure.

#### 9. Roles and responsibilities

Role	Responsibility	
All employees and representatives	<ul> <li>Adhere to and comply with this policy and related procedures.</li> <li>Report any instances of suspected wrongdoing.</li> </ul>	
People Leaders and Group	Ensure all employees and contractors are aware of this policy and maintain an understanding of their obligations.	
Managers	<ul> <li>Facilitate an open culture which raises awareness of this policy and encourages people to report instances of wrongdoing.</li> </ul>	



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Role	Responsibility	
Executive Leadership Team, Group or Department Managers	<ul> <li>Promote the principles of this policy, and foster a culture of awareness, integrity and accountability within AT.</li> <li>Ensure this policy and related processes are followed within their business areas, discussed on a regular basis, and that a high level of understanding is maintained relating to our Speak Up programme.</li> </ul>	
Head of Risk and Assurance (Policy Owner)	<ul> <li>Develop, consult, seek approval of, and implement policy and aligned processes for dealing with protected disclosures.</li> <li>Guide/approve system development to support policy/process.</li> <li>Administer requirements of policy/process relating to protected disclosures.</li> <li>Carry out investigations into protected disclosures in accordance with this policy and the related Protected Disclosures Procedure.</li> <li>Monitor and update this policy.</li> </ul>	
People & Performance	<ul> <li>Support Risk and Assurance in developing processes for dealing with protected disclosures relating to conduct that poses a risk to the health or safety of an individual (such as assault, bullying, and harassment).</li> <li>Carry out or support investigations into protected disclosures relating to conduct that poses a risk to the health and safety of an individual.</li> </ul>	
AT Board (Policy approver)	<ul> <li>Approve and oversee the implementation of this policy.</li> <li>Ensure adequate resources are allocated to meet AT's obligations in line with the Act.</li> </ul>	

# 10. Supporting information

Legislative compliance	This Policy supports Auckland Transport's compliance with the following legislation:
	Protected Disclosures (Protection of Whistleblowers) Act 2022
	Human Rights Act 1993
	Local Government Act 2002
comphance	Local Government Official Information and Meetings Act 1987
	Employment Relations Act 2000
	Health and Safety at Work Act 2015
	Privacy Act 2020





Supporting documents	The <u>Protected Disclosures Procedure</u> identifies the procedures for making, receiving, dealing with and investigating allegations of serious wrongdoing in or by AT which are made under protected disclosure.
Related documents	<ul> <li>Code of Conduct Policy</li> <li>Conflicts of Interest Policy</li> <li>Fraud and Corruption Policy</li> <li>Bullying, Harassment and Discrimination Policy</li> <li>Diversity and Inclusion Policy</li> <li>Health, Safety and Wellbeing Policy</li> <li>Te Kawa Mataaho   Public Service Commission Protected Disclosure Guidance</li> <li>Ombudsman Guide – Making a protected disclosure</li> <li>Privacy Policy</li> </ul>

### 11. Non-Compliance

Breach of this policy may result in disciplinary action up to and including dismissal, and/or the termination of a representative's agreement with AT, as outlined in our Code of Conduct Policy.

The Protected Disclosures Policy supports AT's compliance with governance and legal requirements, in particular the Protected Disclosures (Protection of Whistleblowers) Act 2022. Non-compliance perceived or otherwise can and may lead to increased scrutiny, investigations and reviews, penalties and (in some circumstances) prosecution and or fines.

### 12. Approval & review

Policy Owner: Head of Risk & Assurance Policy Contact: Ryan Marshall

**Endorsed by:** [Add signature] s **Approved by:** [Add signature]

Chief Executive Auckland Transport Board

Approval date:

Effective date: Next review date:

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





### **Recruitment, Selection and Appointment Policy**

### 1. What is this policy about?

Auckland Transport (AT) is committed to delivering inhouse recruitment services (supported by externally AOG approved recruitment agencies) that are fair, equitable, and transparent and support our Diversity, Equity & Inclusion Policy and Māori outcomes strategy.

The Recruitment Policy provides a framework to enable AT to deliver effectively on strategic accountabilities with an attractive employee value proposition and an investment in growing our own talent.

### 2. Who does it apply to?

This policy applies to all AT employees and representatives (such as contractors, consultants, people on secondment, agency temps and interns). It also applies to the AT Board.

Where this policy uses pronouns like "you", "your", "we", or "us", it is referring to anyone listed above, who this policy applies to.

It applies to the recruitment of all permanent, fixed-term, casual and seconded employees. When discussing recruiting in this policy, we are referring to any of these types of recruitment.

This policy doesn't apply to the procurement of contingent labour, such as the engagement of contractors and consultants. These should follow AT's <u>Procurement Policy</u> and our associated guidance in the Procurement Hub.

### **Policy Principles**



It is important to be aware of our key principles and expectations when recruiting staff at AT. By following these principles, we help to ensure we get the right people for the role, and applicants are treated fairly throughout the process.





#### Fair and equitable

AT is committed to delivering recruitment services that are fair and equitable. This means that candidates are assessed objectively, without bias or preconceived judgement. This helps us to ensure we're following our Diversity Equity and Inclusion Policy.

Anyone involved in recruitment must ensure there's no conflict of interest in the hiring process. If you do have a close personal or family relationship with an applicant, you need to declare it and remove yourself from the decision-making process.

#### Aligned to AT's strategy

When recruiting, it's important to align with AT's strategic goals. This means we need to offer an attractive value proposition, and invest in our own talent.

We need to focus on meeting both our current and future talent needs, and supporting strategies like our delivery of strategic programmes and our Diversity and Inclusion Strategy.

Trust, Ethics, and CommunicationYou need to ensure that all recruitment activities comply with this policy and its supporting procedure, as well as any other relevant policies, such as the Diversity, Equity and Inclusion Policy, our Privacy Policy, and the Information and Records Management Policy. This helps make sure that AT is maintaining its obligations under various Acts like the Human Rights Act, Public Records Act, Privacy Act, and Employment Relations Act.

Be sure to keep the People & Performance (P&P) Talent Acquisition team informed during the recruitment process, and if there are any questions about how to manage the process appropriately, speak to them.

More information is available in our Recruitment Procedure, plus the Talent Acquisition team can help you understand what we need to do.

#### **Accountability and Responsibility**

Hiring Managers are in charge of recruiting their team members and are accountable for their hiring decisions, so make sure that the appropriate person is making the decisions.

The Hiring Manager needs to have the necessary skills, knowledge, and experience to make good hiring choices and comply with AT's policy requirements. This also includes making sure that the correct processes are followed – such as approvals within the right delegated authority, and approval from the Resource Governance Group.





#### **Continuous improvement**

AT is committed to adopting leading practices in recruitment and selection and will continue to develop its approach to align with best practice. This includes adopting a competitive approach to recruitment both internally and externally.

#### Respect confidentiality and privacy

It's important that we treat all applicant documentation with confidentially and respect, in line with this policy, our procedure, and other AT policies like the Privacy Policy.

Personal information gathered from or about candidates can only be used to assess their suitability for a vacancy. Any personal information gathered needs to be saved or stored in a secure location so that it can only be accessed by approved people. The Talent Acquisition team can store this information confidentially and securely, so it's best to work with them.

#### **Promote inclusivity and diversity**

When we are open, inclusive and promote diversity, we are helping to ensure that recruitment is fair and equitable, and we are getting the most suitable people for the role. As noted above, we should also consider AT's Diversity and Inclusion Strategy and how our recruitment approach can support it. In doing so, we help uphold the principles of this policy.

#### Check and validate candidates

All candidates selected for employment at Auckland Transport must meet the necessary minimum standards. We carry out criminal history checks and education verification for all candidates. Depending on the role requirements or visa status, additional validity checks or right-to-work checks may be conducted.

Make sure you work with the Talent Acquisition team to ensure that all the necessary checks have been completed before making any offer.

### 3. Key Terms

Term	Definition
Agency Temp	Contingent labour engaged via an AOG partner.
All of Government (AOG) Panel / Sub Panel	An approved panel of recruitment partners used for external recruitment support which provides a lower rate for Government agencies.
Contractor	Contingent labour / resource engaged via an AOG provider or other approved vendor.
Delegated Authority	The 'sign off' or approval limits that have been delegated to AT employees in order to carry out AT's business activities. The register of delegations can be found in AT's <a href="Delegations Policy">Delegations Policy</a> .



Term	Definition
Hiring Manager	A hiring manager is the person responsible for filling a job opening within a team or department. They typically review applications, interview candidates, and make the final hiring decision (subject to Delegated Authority limits).
Remuneration Framework	Defined framework and guidelines to support decision making in relation to remuneration.
Resource Governance Group (RGG) / Governance Framework	<ul> <li>An internal panel which provides for a joined-up (enterprise wide) approach to our resourcing approval process.</li> <li>Established criteria for levels of approvals in relation to recruitment and resourcing.</li> </ul>
Talent Acquisition	The Talent Acquisition (TA) team within People & Performance are responsible for advising on finding and hiring the best people for the organisation. They support the full recruitment process from advertising roles and sourcing candidates to conducting interviews and making job offers.

## 4. Roles and Responsibilities

Role	Responsibility
All employees and representatives	<ul> <li>Adherence and compliance with this policy and related procedures.</li> </ul>
Executive Leadership Team and Divisional, Group or Department Managers	Promote the principles of this policy.
	<ul> <li>Evaluate the need for the position / vacancy with consideration to organisational strategic goals.</li> </ul>
	<ul> <li>Ensure the competence of all nominees who make recruitment decisions within the department.</li> </ul>
	<ul> <li>Notify applicable team members of the requirements of this policy and related procedures.</li> </ul>
Hiring Manager	Manage end-to-end recruitment process in conjunction with Talent Acquisition Business Partner.
	<ul> <li>Review position need and role requirements and ensure position descriptions are updated as required.</li> </ul>
	Responsible for hiring decision and outcome of process.

Role	Responsibility
	Facilitate and support hiring manager on end-to-end recruitment process.
Talent Acquisition team	Facilitate and ensure all appropriate approvals are in place for key actions in line with DFA, Resource Governance framework and Remuneration framework.
	Ensure that appropriate tools and systems are available to support key recruitment activities.
Strategic / Business Partner / P&P Advisor	Provide support and guidance on job design and content of job descriptions.
	Facilitate job evaluation process as required.
Head of Reward, Systems & Analytics	As needed, provide support and guidance on remuneration related matters.
Director – People and	Develop, consult, seek approval of, and implement policy and aligned processes for the development of corporate events guidance for AT.
Performance (Policy Owner)	Guide/approve system development to support policy/process.
	Monitoring and updating of this policy, related procedures and guides.
Chief Executive	Approval of this policy.
(Policy Approver)	Promote the principles of this policy
AT Board	Promote the principles of this policy
<del>-</del>	Oversight of recruitment for executive roles.

# 5. Supporting Information

	This Policy supports Auckland Transport's compliance with the following legislation:
	Employment Relations Act 2000
Legislative compliance	Human Rights Act 1993
J .	Local Government Act 2002
	Privacy Act 2020
	Public Records Act 2005
Supporting documents	• nil





	Code of Conduct Policy
	Conflicts of Interest Policy
	Diversity, Equity & Inclusion Policy
Related documents	Diversity, Equity & Inclusion Strategy
	Employee Referral Scheme Policy
	Resource Governance Group Terms of Reference
	PSA AT Collective Agreement

### 6. Non-Compliance

Failure to comply with this Policy may be considered misconduct and may result in disciplinary action in line with our Code of Conduct, up to and including dismissal or the termination of a representative's agreement.

### 7. Approval & Review

<b>Policy Owner:</b> Director, People and Performance	Policy Contact: Head of Business Partnering, People & Performance
Endorsed by:	Approved By:
Chief Executive	Auckland Transport Board
Approval date:	
Effective date:	Next review date:

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





### **Leave Policy**

### 1. What is this policy about?

Auckland Transport (AT) encourages our people to take leave on a regular basis to promote health and work-life balance.

This policy sets out our approach to leave and provides information and principles for approving leave.

By following the principles of this policy, we ensure that:

- our people are aware of their entitlements and know how to access them,
- · have the necessary time off to rest, recover, and attend to personal matters, and
- AT acts in good faith and in accordance with relevant New Zealand legislation and our employment agreements.

### 2. Who does it apply to?

This policy applies to all AT permanent employees. Fixed-term and casual employees should refer to their employment agreements.

This policy does not apply to people contracted through an agency to work for AT, independent contractors, or consultants.

When we say 'you,' 'your,' 'we,' or 'us' in this policy, we're talking about everyone listed above who this policy applies to.

### 3. What leave is covered by this policy?





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### 4. Annual Leave

Term	Definition
Annual Leave	Leave requested by an employee for the purposes of rest and recreation.
Accrued Annual Leave	Leave that accrues between each anniversary date before an employee becomes entitled to Annual Leave.
Entitled Annual Leave	Leave that an employee is entitled to after completing twelve months of continuous employment.
Annual Leave Balance	The total number of leave days owing to an employee including all accrued and entitled leave entitlements, minus any Annual Leave taken in advance.
Leave in Advance	Any leave applied for once the employee has used all accrued and entitled Annual Leave. Up to 1-week advance leave can be applied for in one leave year (one year from the date of commencement of your last leave in advance).
Entitlement Date	The anniversary date of joining AT or an existing Local Government Organisation if you were employed prior to 1 November 2010 or have since transferred to AT.
	For this policy, current continuous service includes any period the employee was:
	- On paid leave under the Holidays Act 2003; or
	<ul> <li>On parental leave under the Parental Leave and Employment Protections Act 1987; or</li> </ul>
Current Continuous Service	<ul> <li>On volunteers leave within the meaning of the Volunteers Employment Protection Act 1973; or</li> </ul>
	<ul> <li>Receiving weekly compensation under the Accident Compensation Act 2001 or previous accident compensation legislation, as well as, or instead of, payment from AT; or</li> </ul>
	- On unpaid leave up to three months; or
	<ul> <li>Employed by a previous local government organisation, Auckland Council, City Rail Link Ltd, Watercare immediately prior to commencing with AT.</li> </ul>

#### **Entitlement**

You begin to accrue Annual Leave from your first day of work, and after completing 12 months of current continuous service, you will be entitled to four weeks of paid Annual Leave. You can take leave as it accrues, with approval.

This entitlement renews each year on your work anniversary.

After five years of current continuous service, your entitlement increases to five weeks of Annual Leave per year.



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#### Request and approval

Leave requests need to be approved before you start your leave, and where possible it is best to allow plenty of time for approval.

You and your People Leader should agree on the timing of your leave. Leave will not be unreasonably withheld.

When taking Annual Leave, it can be a mix of both entitled and accrued leave. It is important to try and keep your entitled leave balance under 5 weeks. If you have more than 5 weeks of entitled leave and we cannot agree on when you should take it, AT can require you to take your Annual Leave by giving you 14 days' notice.

#### Cashing up

You can request to cash up to one week of your entitled Annual Leave each year (or up to two weeks if you get five weeks of Annual Leave entitlement per year). Approval for this will be by your People Leader.

Any leave you cash up will be paid at the same rate as if you had taken it as Annual Leave. Keep in mind that cashed-up leave is usually taxed at a higher lump sum rate.

For cashing up other types of leave (e.g. Long Service Leave, Alternative Leave), check your employment agreement.

You need to have at least two weeks of Annual Leave balance left after cashing up to make sure you have enough time for rest and recreation, and to see you through until your next anniversary date.

#### **Annual closedown**

If AT has a closedown period, like during the Christmas/New Year period, and you are not required to work, you will be expected to use your entitled Annual Leave. If you do not have enough Annual Leave saved up, you can apply for leave in advance or take leave without pay.

What if I become unwell while on annual or long service leave and need to change my leave type?

If you get sick while you are on annual or long service leave, sick leave shall be granted provided that you provide a medical certificate. The sick leave granted shall replace the leave taken and the leave remaining to the employee shall be increased by the number of days sick leave is granted.

### 5. Bereavement | Tangihanga Leave

Bereavement Leave	Definition
Close relative	Spouse/partner; parent; child; brother or sister; grandparent; grandchild; spouse's parent.
Tangihanga	Broadly this means to create the conditions for grieving and wellbeing after a death and encompasses the protocols and practices for doing so.



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Bereavement Leave	Definition
Kaupapa Tangihanga	Protocols and practices before, during and after the tangi.
Hurahanga Koohatu	The unveiling, literally to uncover the stone.
Whakatahe	Miscarriage; bereavement relating to an unborn child.

We recognise that the loss of a loved one is a deeply personal and challenging experience. Bereavement Leave reflects our belief that taking time to grieve, attend services, and be with family is essential to emotional well-being and healing. We are here to ensure that every employee feels supported as they navigate their loss.

#### What you need to know about Bereavement Leave:

- You need to let your People Leader know as soon as you are aware of a bereavement that might need this type of leave.
- You are entitled to up to five days of Bereavement Leave per bereavement if a close relative passes away.
- If you have a miscarriage (also known as whakatahe), you will be entitled to three days of Bereavement Leave.
- You are entitled to one day of Bereavement Leave if someone else passes away, if your People Leader agrees that you have suffered a bereavement. They will consider how close you were to the deceased (it does not have to be a blood relationship) and whether you have significant responsibilities for the ceremonies or any cultural duties related to the death.
- We understand the importance of paying respects to a deceased family member, whānau, or close associate, including post-funeral rituals that vary across cultures. Generally, Bereavement Leave follows the Holidays Act 2003. If you feel that up to five days would benefit your well-being due to the nature of the family/whānau relationship, the location of the funeral, or any other relevant matters, your People Leader and People & Performance representative may approve up to five days if appropriate.

### 6. Sick Leave

We understand that sometimes you cannot work because you, your spouse/partner, or someone who depends on you for care is sick or injured. We care about your wellbeing and will make sure you are treated fairly if you are dealing with illness or injury, whether it is you or someone you care for. We will balance your needs with the needs of AT.

#### What you need to know about Sick Leave:

- You need to let your People Leader know as soon as you are aware that you are unable to work and need this leave type.
- If you are sick for more than three consecutive days, you may be required to provide a medical certificate, which you will have to pay for.
- People Leaders may also require you to provide a medical certificate where there are reasonable grounds to believe the sickness is not genuine.
- People Leaders are expected to actively work on reducing absenteeism in the workplace.
   This includes working with individuals who have high levels of absenteeism to find ways to reduce it and meet their role requirements.



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 If an employee is deemed medically unfit for work, People Leaders might need to consider medical termination, but only after exploring all reasonable alternatives.

#### 7. Domestic Violence Leave

We support employees impacted by domestic violence with compassion, confidentiality, and access to the leave and resources they need to ensure their safety and well-being.

#### What you need to know about Domestic Violence Leave:

- If you are dealing with domestic violence, whether it is happening now or happened in the past, you can take up to 10 days of paid Domestic Violence Leave each year to handle any related matters.
- When you seek support because of your experience with domestic violence or apply for flexible working or Domestic Violence Leave, we will not ask you for proof or evidence that you are experiencing domestic violence.
- All written records related to your experience with domestic violence, any workplace support and response (including requests for Domestic Violence Leave, flexible working, and financial support) will be stored securely, with access limited only to those AT employees who are directly involved.

Please refer to the AT Domestic Violence Policy for more information on this type of leave, applicability, and support that may be available.

### 8. Jury Service Leave

We encourage our people to fulfil their civic duties by serving as jurors when called upon.

#### What you need to know about Jury Service Leave:

- If you need support to be released from jury service due to special circumstances, discuss it with your People Leader.
- If jury service is not possible because of urgent work commitments, AT can request an excusal from jury service, but the final decision is up to the Courts.
- If you are called for jury service or subpoenaed as a witness, provide a copy of the notification to your People Leader as soon as possible.
- You will continue to receive your normal daily pay while on jury service, provided you
  reimburse AT for all fees paid to you by the Court using the AT reimbursement form. You
  do not need to reimburse payments for expenses like travel. Make sure to provide
  evidence of the amount received from the Court.
- If you are not required at Court for the whole day and are released during your normal
  working hours, you should return to work unless fewer than two hours of your working
  day remain. In that case, you do not need to return to work but will still be paid for your
  normal working day. Inform your People Leader on the day in question or the following
  day if that is not possible.



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### 9. Study Leave

You can apply for Study Leave to help with your professional development, ongoing education, and career growth.

#### What you need to know about Study Leave:

- When you apply, make sure to include how education is relevant to your role and how it will benefit the organisation, like improving services or outcomes.
- You can use Study Leave for attending lectures, classes, or block courses, completing assignments, preparing for exams, and sitting exams.
- We allow up to 10 days of study leave per year (pro-rated if you work less than 5 days a
  week), but you will need your People Leader's approval. You can take up to half of your
  annual study leave within any six-month period.
- In special cases where you need more time to complete your studies, unpaid Study Leave may be granted. If you need leave outside these provisions, you will need approval according to the relevant Delegations Register.

#### 10.Parental Leave

Parental Leave	Definition
Primary Carer Leave	Leave taken when an employee becomes the main carer of a newly born child (or child under 6 years old). A primary carer may include the baby's biological mother, spouse/partner, adoptive parents, Home for Life parents, whāngai, grandparents with full-time care, and other permanent guardians.
Partner's Leave	Leave taken by the partner of the primary carer.
Extended Leave	Leave taken after Primary Carer Leave
Negotiated Carer Leave	Leave taken where an employee is not entitled to Primary Carer, Extended, or Partner's Leave
Paid Parental Leave	Payments made by IRD, up to a specified maximum amount, to the primary carer of a child (in conjunction with the definition of Primary Carer Leave above).
Special Leave	Leave taken prior to the start of parental leave, for reasons related to the pregnancy or adoption (for example, antenatal checks, or pre-adoption requirements). This leave type is up to 10 days' unpaid leave (unless covered by sick leave entitlements).
Pre-term Baby Payments	Payments from IRD where a child is born pre-term. This is in addition to normal Paid Parental Leave.
Keeping in touch hours	Worked hours, paid by AT, to enable staff to remain connected to their work while on Parental Leave. This could include attending meetings, taking on discrete pieces of work, or other duties as agreed by both the staff member and their People Leader.



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We support our people who want to take time off to raise a child (through birth or adoption of a child under 6 years old) and then return to their career with us. Please check your employment agreement for your entitlements regarding Parental Leave, as well as the Parental Leave and Employment Protection Act 1987.

#### **Request and Approval**

If you plan to take leave under this policy, you need to give your People Leader at least three months' notice in writing. Submit your notice via Pā Mai and include the following information:

- The type of leave you are requesting (e.g., Primary Carer's Leave, Extended Leave, Negotiated Carer Leave, Partner's leave).
- The start and end dates for the leave. If you are sharing Primary Carer or Extended Leave
  with a partner, provide a separate document outlining the dates each partner will be
  caring for the child.
- A certificate from a doctor or midwife stating when the baby is due, or a legal document outlining the care of a child under 6 years old (e.g., confirmation of adoption).
- If you need to start your Parental Leave earlier than planned, then wherever possible, you must give your employer three weeks' notice.
- For Negotiated Carer Leave, you need to explain how the employer can manage any issues related to your absence. This type of leave has different requirements, and your People Leader may decline it based on specific operational circumstances.

#### What happens next

- Your People Leader must consider your leave application within 21 days and approve it if you're entitled to the requested leave.
- If you're not entitled to take the leave, your People Leader must explain why.
- Once approved, you can start your leave up to six weeks earlier than the expected due
  date if necessary for medical or other reasons. In such cases, give your People Leader
  21 days' notice of the new leave date if possible.

#### What you need to know about Parental Leave

- Employees taking Parental Leave are considered to have unbroken continuous service.
- Annual Leave continues to accrue during Parental Leave. If you take Annual Leave that
  you become entitled to during Parental Leave or within 12 months after Parental Leave,
  the payment for that Annual Leave will be the greater of your ordinary weekly pay or
  average weekly earnings (an average of the preceding 12 months' earnings).
- If you end your employment for any reason other than redundancy within three months of taking Parental Leave, any entitled annual leave will be paid at the rate of your average weekly earnings for the preceding 12 months. This rate may be lower than your current ordinary weekly pay.
- Your employment will be protected for the duration of your parental leave. There are some exceptional circumstances, such as restructuring or where a temporary replacement is not reasonably practicable due to the key position occupied by the employee. We will consult with you if any of these situations occur.
- If you don't intend to return from Parental Leave, your Parental Leave commencement date will be used as your last day of employment, including for final pay calculations.



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### 11. Special Paid Leave

Special Paid Leave is leave not covered by an employee's annual leave and sick leave entitlements. Special Paid Leave is not statutory and is discretionary in nature.

To apply for Special Paid Leave, write to your People Leader and get approval at least 14 days before you want to start your leave. People Leaders should respond to your request as soon as possible. Special Paid Leave is granted at the discretion of the relevant Delegated Authority.

Below are some situations where Special Paid Leave might be considered (this isn't an exhaustive list):

- Military service: AT usually supports leave requests for military service. If you undertake
  full-time voluntary training in the Defence forces for up to three months, your job is
  protected by the Volunteers Employment Protection Act. You can choose to take this
  leave on full pay, but you'll need to refund AT your military service pay.
- Extra study leave: Requests will be considered according to employment agreements and the Learning and Development Policy.
- Illness: If treatment, recovery, and rehabilitation exceed paid sick leave entitlements.
- Employment Relations Education Leave: Subject to the provisions of the Employment Relations Act 2000 and relevant employment agreements.
- Compassionate leave: For personal circumstances like bereavement and family or personal crises, considered on a case-by-case basis.
- Sporting or cultural leave: Usually considered if you're selected to represent New Zealand at an international level in a recognised sport or activity.

#### What you need to know about Special Leave:

- Certain People Leaders can approve up to 10 working days of special paid leave in exceptional circumstances, following the guidelines in this policy and the Delegated Authorities.
- When considering Special Paid Leave requests, People Leaders should look at each
  case individually. They should consider factors like your personal circumstances, length
  of service, any Special Paid Leave or advance leave you've already been granted in the
  past 12 months, the impact of your absence on service levels and the rest of the team,
  and the need and cost of backfilling your position.
- If your request for Special Paid Leave is declined, your People Leader should meet with you as soon as possible, ideally within 10 working days of receiving the request, to explain the reasons. They should also discuss any other available options with you such as Leave Without Pay or advance leave. If it relates to the immediate well-being of your family, Well-being Leave might also be considered.
- Submit your Special Paid Leave request to your People Leader for approval before it progresses to the next stage for endorsement.

### 12.Leave without Pay

Leave Without Pay is for when you need time off but do not have any Annual Leave or Sick Leave left. It is extra leave that is not part of your usual entitlement and is given at AT's discretion.



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Below are some common reasons you might request Leave Without Pay:

- Study Leave requests will be considered based on your employment agreement and the Learning and Development Policy.
- Compassionate leave in personal circumstances such as bereavement and family or personal crisis, depending on the situation.
- If you are sick and need more time to recover than your paid Sick Leave allows.
- If you need to care for dependents and do not have other leave options.
- If you want to take a sabbatical to study full time.

### 13. Roles and Responsibilities

Role	Responsibility
All Employees and Representatives	<ul> <li>Adherence and compliance with this policy and related procedure.</li> <li>Discuss their leave requirements with their People Leader prior to applying or advise their People Leader as soon as practicable of the reason for requesting/taking leave.</li> <li>Complete and submit the relevant leave documentation.</li> </ul>
All People Leaders	<ul> <li>Ensure employees understand their leave entitlements.</li> <li>Consider applicable leave requests.</li> <li>Comply with the Delegations Register in respect of any leave requested.</li> <li>Ensure leave documentation is completed and approved and forwarded to payroll promptly. Where an employee is unable to complete this, it is the People Leader's responsibility to ensure they have completed on their behalf.</li> <li>Actively plan leave usage for their areas.</li> <li>Actively manage where excessive unplanned leave is used, with consideration for the employee's wellbeing and organisational operational requirements.</li> <li>Discuss with the employee if declining any leave requests.</li> <li>Promote the principles of this policy.</li> <li>Notify applicable personnel of the requirements of this policy and procedures.</li> </ul>
Chief Executive, Divisional, Group or Department People Leader	<ul> <li>Promote the principles of this policy.</li> <li>Notify applicable personnel of the requirements of this policy and procedures.</li> <li>Consider and approve escalated leave requests, where they fall outside of the direct line People Leader's Delegated Authority.</li> </ul>



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Role	Responsibility
Policy Owner/s, Director, People and Performance (Policy Owner)	<ul> <li>Develop, consult, seek approval of, and implement policy and aligned processes for the development of leave guidelines for AT.</li> <li>Guide/approve system development to support policy/process.</li> <li>Administer requirements of policy/process relating to all leave.</li> <li>Monitoring and updating of this policy, procedure, guidelines and rules.</li> </ul>
Payroll	<ul> <li>Process leave requests and maintain accurate leave records.</li> <li>Process Jury Leave documentation, reimbursement of Court fees and maintain accurate records.</li> </ul>
AT Board (Policy Approver)	<ul><li>Approve this policy</li><li>Promote the principles of this policy</li></ul>

# 14. Supporting Information

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Legislative compliance	This Policy supports AT's compliance with the following legislation:  Holidays Act 2003 Parental Leave and Employment Protection Act 1987 Volunteers Employment Protection Act 1973 Accident Compensation Act 2001 Employment Relations Act 2000 Juries Act 1981
Related documents These are documents that relate to, but do not directly support, this Policy. This may include other Auckland Transport Policies, Procedures and Guidelines, or external materials such as regulatory codes and standards.	<ul> <li>AT Employment Agreement</li> <li>Code of Conduct Policy</li> <li>Domestic Violence Policy</li> <li>Domestic Violence Procedures</li> <li>Learning &amp; Development Policy</li> <li>Safety, Health, and Wellbeing Policy</li> <li>Flexible Working Policy</li> </ul>



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### 15. Non-Compliance

All AT employees should make themselves familiar with AT's policies, procedures, guidelines and business rules. Ignorance of AT's policies and processes is not an acceptable excuse if a breach occurs.

Breach of this Policy may result in disciplinary action being taken against employees, up to and including dismissal.

### 16.Approval & Review

<b>Policy Owner:</b> Director, People and Performance	<b>Policy Contact:</b> Head of Business Partnering, People & Performance
Endorsed by:	Approved By:
Executive Leadership Team, Chief Executive	Auckland Transport Board
Approval date:	
Effective date:	Next review date:

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





### **Treasury Management Policy**

### 1. Purpose

The purpose of this policy is to provide the framework for the management of Auckland Transport's Treasury (i.e. borrowings, interest rate exposure, debt security, foreign exchange transactions and investments).

#### 2. Scope

This policy applies to all Auckland Transport (AT). AT employees and AT representatives (such as contractors, consultants, agency temps, external staff on secondment and volunteers).

It also applies to all transactions conducted by AT.

### 3. Policy Principles

AT is required to comply with Auckland Council's Treasury Management Policy and Treasury Operating Manual.

To ensure that AT manages its treasury effectively and efficiently AT will:

- Comply with Auckland Council's accounting and planning procedures and participate in the preparation of group plans and financial accounts.
- Maintain spending within approved budgets.
- Provide detailed information about planned projects, including proposed funding sources, to Auckland Council if requested.
- Proactively focus on efficiently managing cash balances, the use of bank accounts, and the implementation of standard payment terms.
- Prudently manage AT's credit exposures.

AT does not have the authority to lend, borrow or acquire financial investments in its own right. The Council operates centralised treasury management and undertakes all treasury activities on behalf of AT.

AT staff are required to consult with Finance for all treasury transactions. This includes non-standard vendor payments or changes to vendor payment terms, overseas payments and foreign currency transactions.

AT does not take a speculative position on foreign exchange. AT seeks to minimise foreign currency risk on all foreign currency transactions and will apply foreign currency exposure mitigation (hedging) where appropriate.

All AT loans are back-to-back with Auckland Council with long term fixed interest rates. Auckland Council and AT are exposed to financing risk whenever new debt is raised or existing debt is refinanced. The Council's Treasury function limits financing risk by a mix of approaches which are outlined in the Council's Treasury Operating Manual.





### 4. Key terms

Term	Definition
Borrowing/Ioans	Obtaining funds from another party with the promise to return the principal with or without interest.
Financial investments	Various financial instruments or assets that have an expectation of generating returns over time. These investments can include stocks, bonds, mutual funds, real estate, and other assets.
Foreign currency hedging	Using financial instruments to protect against the risk of adverse movements in exchange rates. The primary goal of hedging is to mitigate potential losses rather than to generate profits
Treasury	The management of financial resources, including cash flow, borrowings, investments, and risk management.

# 5. Roles and Responsibilities

Role	Responsibility
All Employees	<ul> <li>Adherence and compliance with this policy and guidelines</li> <li>Notify Finance of any transactions that have potential for foreign currency exposure</li> <li>Notify Finance to ensure foreign currency exposure mitigation is considered and included in business cases</li> <li>Notify Finance of any potential for new operating and finance leases and borrowings</li> </ul>
Finance	<ul> <li>Provide support and guidance to employees</li> <li>Proactively and efficiently manage cash balances to ensure sufficient liquidity</li> <li>Notify Auckland Council treasury of any foreign currency transactions, new operating and finance leases and borrowings</li> </ul>
Executive Leadership Team, Directors, Group Managers or Department Heads	<ul> <li>Promote the principles of this policy</li> <li>Notify applicable personnel of the requirements of this policy, guidelines and related procedures.</li> </ul>
Director, Finance & Corporate Services (Policy Owner)	<ul> <li>Develop, consult, seek approval of, and implement policy and aligned processes for the development of the Treasury Policy for AT.</li> <li>Administer requirements of policy/process relating to treasury management.</li> <li>Monitoring and updating of this policy, procedure and guidelines.</li> </ul>

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Role	Responsibility
Chief Executive (Policy Owner)	<ul> <li>Promote the principles of this policy</li> <li>Oversee AT's Treasury functions in accordance with this policy.</li> </ul>

### 6. Supporting Information

Legislative compliance	This Policy supports Auckland Transport's compliance with the following legislation:  • Local Government Act 2002  • Local Government (Auckland Council) Act 2009  • Local Government (Auckland Council) Amendment Act 2011	
Supporting documents	AT Delegations Register     Auckland Council Treasury Management Policy     Auckland Council Treasury Operating Manual	

### 7. Non-Compliance

Breach of this policy could result in disciplinary action being taken against employees up to and including dismissal and the termination of an agreement/arrangement with a representative.

### 8. Approval & Review

<b>Policy Owner:</b> Chief Financial Officer and Director Corporate Services	Policy Contact: Financial Reporting Manager
Approved by:	

Chief Executive

Approval date:

Effective date: Next review date:

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

