

Code of Conduct Policy

Overview

Our reputation in the market place as a company of choice is one of our most precious assets. The manner in which you conduct yourself as an employee is imperative to this reputation.

This policy sets out the standard of behaviour that is expected of you, as our employee, at all times and the consequences if you fail to meet the required standard.

Application

This policy applies to all employees, and contractors. This policy applies when you are working in one of our offices, attending a meeting with a customer or supplier, at a work function or attending to any other business on our behalf.

General Expectation

You are expected to act in a professional manner that is in our best interests at all times.

Performance of your duties

You must perform your duties honestly, faithfully, efficiently, competently, and to an acceptable standard. This includes being at work when required, following all reasonable and lawful directions, demonstrating an appropriate standard of dress, language and behaviour as well as a commitment to our Attitudes.

Our Attitudes

Our attitudes are core behaviours that encompass our values, and establish the type of culture we want at IAG NZ.

Real – be genuine, act with integrity, share, be yourself, like yourself, have pride

Inspiring – grow and develop others, motivate, be thoughtful, help, give feedback and support

Together – meaningful relationships, bond, connect, care, co operate, contribute, fun, whanau

Achieving – strive for your best, have ambition, challenge yourself, be focussed, make a difference

Give back – ensure the future, be sustainable, enhance our community

Treatment of others

It is important that every individual is aware of how their behaviour or comments may be interpreted and understood by other people.

You must treat all colleagues, customers and service providers politely, helpfully and with respect. All requests should be dealt with accurately and promptly. You should not engage in any harassment, sexual harassment, bullying or discrimination in the workplace.

Compliance with policies and guidelines

You must be familiar with and comply with all of our policies and guidelines which are located on the Our People pages on Vibe.

From time to time we may amend our policies and guidelines, any amendments will be published on the consultation page on Vibe for your review and comment.

Policy owner and version control

The Executive General Manager Human Resources is the owner of this policy. This policy is approved by IAG New Zealand Executive. This is version 3 dated November 2009.

Our property

You must show reasonable care when using our property, funds and resources and these should only be used for authorised purposes. This includes our systems and client information.

Media and public comment

You are not to make statements to the media on matters affecting us, except with the specific authority of the Chief Executive Officer or the Communications and Media Manager. If you are approached by the media you should politely refer the enquiry to the Communications and Media team.

Handling our information

You must take proper care with the use, exchange, storage and release of any information (whether written, verbal or electronically recorded) for which you are responsible, to ensure it remains secure and is only used for the intended purpose.

The Privacy Act (1993) sets out the requirements for the collection, use and storage of information and you must ensure that you are aware of this Act and how it impacts on your role with us.

When using electronic information you must ensure that IT&T systems are used in a way consistent with their normal function. The IT&T Usage Policy outlines the specific responsibilities when using electronic information and equipment. You are required to understand this policy and any other instructions regarding IT&T usage that are distributed from time to time.

Confidentiality During your employment, you will become aware of, and have access to, personal information about customers, employees and other individuals and IAG commercially sensitive information. You must keep this information confidential and only use it for IAG business purposes.

Confidential information does not include information that was public knowledge when your employment with the company commenced or became so at a later date.

Your obligation to protect IAG confidential information continues after your employment ceases. This means you must not use confidential information for your own benefit or the benefit of anyone else, disclose it to any third party, copy it or take it with you when you leave.

Conflicts of interest and compromising integrity A conflict of interest is a situation where your personal or professional interests may conflict with your position and your obligations and responsibilities as an employee of IAG NZ. It may also include situations where you act in a way or use your influence as an IAG NZ employee that would compromise IAG NZ's reputation or affect the manner of our business.

You must make every effort to avoid conflicts of interest and you must inform your manager if you have, or could be perceived to have a potential or actual conflict of interest.

Examples of where a conflict of interest may arise:

- A manager signing off their own business related expenses
- An employee processing any transactions for yourself, your family members or close associates.
- An employee using their position to influence an outcome on a personal claim or in conducting business within IAG NZ.

Dishonest and inappropriate behaviour There is a zero tolerance to any actual or suspected criminal activity, including but not limited to, fraud (including fraudulent staff claims), theft, illegal drug dealing, possession or consumption of illegal drugs at work, unauthorised or inappropriate access, falsification, alteration or use of our business records.

Private activities

You must not, without prior written consent of your manager, engage in secondary employment. This consent will not be unreasonably withheld or withdrawn unless the secondary employment affects the maintenance of your work performance standards or creates any conflict of interest.

You should avoid any activity (work related or private) which could reflect badly on us or jeopardise our reputation or relationships in the market and bring IAG NZ into disrepute.

You must inform your manager:

- If you have any criminal charges or convictions laid against you in a criminal court
- If you drive a company vehicle or private vehicle for business purposes and you are disqualified from driving or have your licence otherwise suspended
- If you apply for bankruptcy or become bankrupt.

Of your legal entitlement to work in New Zealand if applicable i.e. citizenship, permanent residency, appropriate work permits and if your authority to legally work in New Zealand is revoked or changed for any reason.

Gifts and gratuities

Great care must be taken when accepting gifts or benefits as they may compromise, or be seen to compromise, our integrity. Any gift, favour or other benefit received from parties external to us must be declared to your manager.

From time to time occasional gifts of a modest value and scale (usually up to the value of \$250) may be given or received as part of customary business practice. You and your Manager must decide whether to return the gift, donate it to charity, or share it between employees. Approval to retain or give a gift does not constitute a precedent for any other gift.

If you are in doubt about the suitability of giving or receiving a gift, you should discuss the matter with your manager or the HR Advice Centre.

Misconduct

Conduct which is outside the acceptable rules but not liable for dismissal will be dealt with under our warning system and your employment agreement.

Examples of behaviour that would generally be deemed misconduct, include (but are not limited to):

- Failure to complete stipulated hours of work
- Unauthorised absence
- Excessive, ongoing or cyclical absenteeism and persistent lateness.
- Deliberate avoidance of duties or poor performance
- Using abusive or obscene language causing offence to another person on our property or while attending to business on our behalf
- Irresponsible or unauthorised use of our property
- Failure to observe general safety and wellness rules
- Carrying out other duties or secondary employment which adversely affects performance at work and without prior approval
- Using a mobile phone while driving (including hands free) in a company vehicle or use of a company mobile phone while driving in a private vehicle

Serious misconduct

A single instance of serious misconduct may result in you being summarily dismissed, without the need for any warning.

Examples of behaviour that would generally be deemed serious misconduct include (but are not limited to):

- The possession, consumption or being under the influence of illegal drugs at work or whilst representing us
- Unauthorised consumption of alcohol on our premises or being under the influence of alcohol to the extent that you are unable to perform your duties in a satisfactory and safe manner.
- Verbal or physical harassment, sexual or other forms of harassment, abuse or violent behaviour of any kind in, or affecting, the workplace and externally if representing us in any capacity
- Unauthorised use or possession of our property or the customer's property
- Driving a company vehicle for any illegal or unauthorised act which results in a loss of licence, including being under the influence of alcohol or illegal drugs
- Non disclosure of criminal charges and convictions (including driving convictions) or any other information in relation to pre employment checks.
- Refusal to carry out any reasonable or lawful instruction without acceptable cause
- Falsification of our documents or records (including employment applications, time keeping records and medical certificates)
- Misrepresenting us for personal gain or seeking or accepting bribes or inducements

Serious misconduct (Cont'd)

- The use of our funds, customer base or any other resources for anything other than authorised purposes
- Unsafe behaviour causing risk to self, fellow colleagues, other persons or equipment and which may lead to serious harm.
- Misuse of technology, including excessive personal e-mail and internet usage and abuse of our IT & T Policy.
- Breaches of confidentiality, such as misuse or unauthorised disclosure of confidential information
- Inappropriate behaviour which brings us into disrepute – this can include behaviour outside the normal working environment or normal working hours
- Processing sales and claims transactions for yourself or lodging, settling or attempting to settle a claim for yourself, family members or close associates
- Exerting undue influence on claims, associates or investigations in respect of a claim made by yourself, family members or close associates, in order to obtain advantage in the settlement of a claim
- Any wilful breach of company policy
- Any other dishonest behaviour which results in a break down of trust and confidence in the employment relationship

Breaches of policy

We will treat breaches of this policy as a very serious issue. Any proven breach may result in disciplinary action being taken against you, up to and including termination of your employment.

Further information

Further information in relation to this policy can be obtained from the HR Advice Centre by e-mailing hr.enquirymailbox@iaq.co.nz or on extn: 91659 or 0800 HR HELP (0800 474 357).