



Port of Tauranga
Connecting New Zealand and the World

Fraud and Corruption Policy

February 2026

1. Purpose

The Port maintains an unwavering commitment to ethical business conduct across all operations and activities. This Fraud Policy ("Policy") serves to safeguard the Port, its business operations, assets, and stakeholders, from harm resulting from fraudulent, corrupt, or dishonest conduct. The Policy establishes high level guidance for preventing, identifying, and responding to such activities that occur within the Port or involve the company's interests. The Port categorically does not tolerate fraud or corruption in any form.

While this Policy specifically addresses fraudulent, corrupt, or dishonest activity, its scope encompasses all intentional deceptive acts or omissions designed to provide direct or indirect advantage to any individual or entity, or that cause detriment or loss to the Port.

To minimise and discourage fraudulent, corrupt, and dishonest conduct within the Port's operations, this Policy establishes three fundamental objectives:

- **Prevention:** Minimise exposure to fraudulent, corrupt, or dishonest conduct by fostering awareness and accountability among all parties engaged in the Port's activities.
- **Detection:** Identify fraud or corruption as early as possible through effective reporting mechanisms and response procedures.
- **Response:** Implement prompt remedial measures to address harm from fraudulent, corrupt, or dishonest activity, including evidence preservation to ensure appropriate outcomes.

This Policy governs all instances of fraud or suspected fraud involving directors, officers, employees, contractors, consultants, suppliers, and any third parties engaged in business relationships with the Port, in accordance with our responsibilities as an NZX-listed entity.

2. Scope

This Policy applies to all directors, officers, employees, contractors, consultants, customers, suppliers, and any third parties engaged in business relationships with the Port.

Employees for the purposes of this Policy include:

- Current employees.
- Former employees.
- People seconded or contracted to the Port.

3. Definitions

Terminology	Definition
Fraud	<p>An intentional act or omission by one or more individuals involving the use of deception to obtain an unjust or illegal advantage (financial or non-financial) for themselves, another person or company, or for the Port.</p> <p>Fraud becomes a crime when it is a knowing misrepresentation of the truth or concealment of a material fact to induce another to act to his or her detriment.</p>
Corruption	<p>The lack of integrity or honesty or the misuse of a person's position or office for dishonest personal gain or advantage for themselves or for another person / entity.</p>
Ethics Committee: <ul style="list-style-type: none"> • GM Corporate Services • Risk Specialist • GM Communications 	<p>This Committee aids in addressing ethical issues that arise and oversee the investigation of alleged misconduct, suspected fraud, or corruption. They will engage legal counsel and any other specialists they may need to assist.</p> <p>The Ethics Committee also drives the ethics and fraud training and awareness programs.</p>

4. Principles

Examples of fraud and/or corruption

Fraud and corruption include, *but are not limited to*:

- Using confidential company information, including material non-public information, for personal financial gain or to provide unfair advantage to others
- Theft of company property, including information
- Forgery or alteration of company or third-party documents
- Willful destruction or removal of company records
- Falsification of expense claims
- Unauthorised disclosure of confidential information to outside parties
- Misappropriation or use of company assets for personal gain
- Willingly undertake or assist in illegal activity
- Paying bribes to favor the company or to contravene any laws
- Acceptance of bribes or gifts to favour third parties
- Undue preference and/or benefit extended to a company or individual where there is a conflict of interest
- Knowingly generating or paying false claims or invoices.

5. Policy statement

The Port does not tolerate fraud, corruption, or dishonest behaviour in any form and maintains a ZERO TOLERANCE policy for such activities. The Port is committed to preventing, detecting, and responding to all fraud and corruption threats.

To uphold this commitment, the Port will:

- **Investigate and respond:**
 - Investigate all suspected cases of fraud or corruption thoroughly and promptly
 - Take appropriate disciplinary action when allegations are proven, including termination of employment and referral to NZ Police, the Serious Fraud Office, or other authorities as required
 - Recover all losses caused by fraudulent or corrupt behaviour, including money, assets, intellectual property, and investigation costs.
- **Detection:**
 - Require immediate internal reporting of all suspected fraudulent or corrupt activities
 - Implement and continually improve monitoring systems and controls to detect fraud and corruption as early as possible
 - Create safe and effective reporting options for staff to raise concerns about suspected fraud or corruption.
- **Culture and standards:**
 - Promote transparency and ethical behaviour across all POTL operations
 - Apply POTL's values consistently to ensure all employees understand expected ethical standards.

Duty to report fraud or corruption

Any person who suspects that a fraudulent or corrupt act is occurring or has occurred, must report this immediately. All information about suspected fraud or corruption is to be treated confidentially to the extent possible, and if made by an employee, may be made as a protected disclosure in accordance with the POTL Protected Disclosure Policy.

Suspected incidents of fraud or corruption are to be notified in one of the following ways:

- Notifying a relevant manager or Senior Management Team member
- Make a protected disclosure under the Protected Disclosures Act 2000. Please refer to the Whistleblowing (Protected Disclosures) Policy
- Using the independent and anonymous Report it Now Whistleblowing hotline:
 - 0800 2 ALERT (0800 225 378)
 - <https://reportitnow-global.com/nz/>
 - secure online portal - <https://ethicspro.reportitnow-global.com/POT>

6. Roles and responsibilities

Role	Responsibility
The Board	<ul style="list-style-type: none"> Approves the Fraud Policy Sets the risk appetite for fraud.
Audit Committee	Oversight of the fraud and corruption controls and mitigations and the assurance of these.
Chief Financial Officer (CFO)	<ul style="list-style-type: none"> Owns the Fraud Policy Reports on the effectiveness of the fraud controls and response activities to SMT, the Audit Committee and Board.
Chief Executive (CE)	<ul style="list-style-type: none"> Provide reports to the SMT/Audit Committee/Board on incidents of fraud or corruption and the status of investigations Advisory member – Ethics Committee.
All managers	<ul style="list-style-type: none"> Promote transparency and ethical behaviour across all POTL operations Apply POTL's values consistently to ensure all employees understand expected ethical standards Act as role models and take active steps to prevent, detect, and respond to fraud and corruption Continuously identify and be aware of fraud risk schemes and potential vulnerabilities Assess the identified risk and implement measure to mitigate the risk as guided by the Risk Management Framework.
All employees	<ul style="list-style-type: none"> Being aware of, and complying with this Policy Acting honestly, fairly and with integrity All POTL employees have an obligation to report suspected fraud and corruption and must understand the process for doing so.
Ethics Committee	<ul style="list-style-type: none"> Promptly reviews all reports of suspected fraud, corruption or irregularities and authorise appropriate action in consultation with Legal Counsel and relevant stakeholders Initiate fraud and corruption awareness training.
Risk Specialist	<ul style="list-style-type: none"> Administer the Policy Management of all investigations initiated by the Ethics Committee Assist with fraud risk assessments to identify areas where fraud could be perpetrated Ensure that fraud risk reviews are conducted annually. Organise other assurance work in identified risk areas.

7. Communication

- This Policy will be part of all onboarding packs and will be available on the intranet.
- An annual email communication as well as more regular communication on the radar screens to remind employees of the Policy.

8. Training and support

An online training module will be developed. Completion will be mandatory for all new employees within 90 days of commencement at POTL and annually for all employees.

The Ethics Committee will provide ongoing support.

9. Assurance and compliance

- A data analytics dashboard is in use
- A high-level fraud risk review will be conducted by an outside service provider every three years
- Regular fraud risk reviews facilitated by the Risk Specialist
- All non-compliance to this Policy will be reported to the Senior Management Team and Audit Committee.

10. Related documents

- Protected Disclosure Policy
- Procurement Policy
- Conflict of Interest Policy
- Code of Ethics

11. Document control

Version	Date	Author	Approved by	Details / changes
1.0	December 2025	Risk Specialist	SMT	Original document

12. Review

Approved:	Board
Policy owner:	Chief Financial Officer
Effective date:	1 January 2026
Next review date:	January 2027 (or earlier if required)
Approval:	Senior Management Team