



## NZFC Code of Conduct

***Work with integrity, an open mind and commitment.***

*Kia ngākau pono, kia mākohakoha, kia manawanui.*

This Code of Conduct outlines the expectations Te Tumu Whakaata Taonga New Zealand Film Commission (NZFC) has of NZFC staff, Board members and all entities and individuals interacting with the NZFC; including past, current, and potential applicants to NZFC funding programmes and initiatives as well as industry stakeholders, service providers and contractual partners.

Our Code of Conduct is an essential tool for guiding our decisions and actions. It sets out how we ensure a high level of integrity and impartiality in what we do.

The NZFC recognises that the responsibility of creating and preserving a safe environment is a collective one and as such would like to acknowledge existing industry codes of practice and guidelines such as SPADA's Code of Best Practice and ScreenSafe's Health and Safety Guidelines and Sexual Harassment Prevention Policy.

### **1. NZFC Staff and Board Members:**

- 1.1 We act within our delegations and comply with all applicable laws, regulations and the policies and procedures of the NZFC.
- 1.2 We are guided by government expectations and priorities and maintain political neutrality.
- 1.3 We will not engage in conduct that may (if publicly known), or does, bring the NZFC and/or wider screen industry into disrepute.
- 1.4 We are personally responsible for delivering a high standard of work and responsive, impartial and professional services to our stakeholders on behalf of the government.
- 1.5 We put our stakeholders at the centre of what we do and design our processes and innovate from their perspective. We understand the need to identify and remove barriers to access and work to ensure that individuals or groups are not disadvantaged in respect of the services we provide.
- 1.6 We use the tools and resources we have appropriately and cost-effectively.

- 1.7 We value and respect diversity, equity and inclusion and regardless of the challenges or differences in opinion, we act in ways that are ethical, safe, fair and unbiased.
- 1.8 We will not tolerate bullying or harassment on any grounds. Nor will we behave in a way that intimidates, degrades, insults or hurts others.
- 1.9 We aim to be transparent, open and honest. This means that we take personal responsibility for our actions, and take accountability when things go wrong. We are courageous and speak up immediately and appropriately if something goes wrong or we see dishonesty.

## **2. NZFC Stakeholders**

- 2.1 The expectations of stakeholders in this Code of Conduct apply to all interactions with NZFC staff, including in-office encounters, meetings, email communication, phone calls, shared online spaces, social media, third party publications and work-related events.
- 2.2 The NZFC expects stakeholders to treat NZFC staff with respect and that stakeholders will abstain from any form of unacceptable behaviour towards NZFC staff. “Unacceptable behaviour” includes, without limitation, behaviour that is:
  - Physically violent
  - Insulting or threatening (including via emails, phone calls, online or face to face meetings, text messages, and social media)
  - Inappropriate, abusive, degrading or offensive (including physical acts, remarks, jokes, insinuations or comments)
  - Intimidation of any sort
  - Bullying
  - Unlawful discrimination
  - Unwanted verbal or written sexual advances or sexual propositions
  - Behaviour that contravenes SPADA’s Code of Best Practice and/or ScreenSafe’s Sexual Harassment Prevention Policy
- 2.3 Stakeholders should ensure they inform themselves of all their legal obligations in dealing with NZFC. By way of example only, and without limiting those obligations, stakeholders should:
  - Conduct their business free from extortion, bribery and all unlawful, unethical, or fraudulent activity.

- Use the NZFC’s funding exclusively for the purposes detailed in contractual agreements governing such funding.
- Not mislead or deceive the NZFC by act or omission such as making false statements or submitting false or misleading or inconsistent documentation.
- Promptly respond to questions asked by NZFC personnel with respect to funding applications.
- Not offer bribes, gifts or any type of reward to an NZFC employee with the intent of trying to improperly influence a funding decision.
- Not engage in collusive bidding, price fixing, price discrimination, inflation of budgets, rates or fees, or any other unfair trade practices in violation of competition laws.

### **3. Non-Compliance**

- 3.1 If the NZFC determines that a staff member is in breach of this Code of Conduct, this will be addressed fairly and promptly and may include disciplinary action, including dismissal, if appropriate.
- 3.2 If the NZFC determines, in the fair and reasonable exercise of its discretion, that a stakeholder has not met the expectations outlined in this code of conduct, depending on the nature (including, without limitation, the seriousness) of such non-compliance, the NZFC may implement measures in respect of the individual or entity concerned, including but not limited to:
- Limiting or ending contact with the stakeholder
  - Limiting how, when or where the stakeholder may contact NZFC
  - Limiting who at the NZFC the stakeholder may contact
  - Any other limitations permitted under NZFC’s Terms of Trade, Criteria for Rebate Funding or Co-production Certification
  - In certain circumstances other action may be taken including withdrawing, pausing or requiring repayment of NZFC funding, or exclusion from NZFC funded projects

### **4. Complaints**

- 4.1 Any breaches of this Code of Conduct should be reported to the NZFC Complaints Officer by emailing [complaintsofficer@nzfilm.co.nz](mailto:complaintsofficer@nzfilm.co.nz) or by posting it to: The Complaints Officer, NZ Film Commission, PO Box 11 546, Manners Street, Wellington 6142.

- 4.2 Where a complaint is made, in accordance with our [External Complaints Policy](#), the NZFC will undertake all reasonable steps to keep complainants informed of the progress of their complaints and to understand and provide a timely resolution of complaints in accordance with the requirements of natural justice.
- 4.3 Where the NZFC have been involved in, observed, or been made aware of any action that may not meet the expectations outlined in this Code, we will follow our NZFC policies to raise these concerns appropriately.

Review Log

Date Reviewed	Notes	Approved by
January 2025	Code of Conduct approved	CEO