

Code of Ethical Advocacy

Adopted: 18 September 2025:

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Introduction

This policy fits within the ethical framework of Transparency International New Zealand.

This Policy should be read alongside TINZ Rules/Constitution, the elements of the Code of Conduct, and relevant policies

1. Policy Statements

- 1.1 In order to achieve our vision of a world in which government, politics, business, civil society and the daily lives of people are free of corruption, Transparency International New Zealand (TINZ) is actively advocating and routinely engaging with a wide range of individuals as well as public and private institutions in New Zealand and regionally. TINZ is a non-profit organisation, committed to the fight against corruption and to being transparent about our advocacy activities, as well as our policies, expenditure and the names of the individuals working for us.

TINZ is committed to ethical behaviour in all aspects of our work and this is reflected in our governance and ethics framework. TINZ has a number of specific policies which aim to ensure that we adhere to the highest ethical standards in our work. These are summarised in our [Vision, Mission, Values, Organisational Integrity approach, our Guiding Principles and our Statements on Finance and Transparency](#), which collectively form our Code of Conduct. Bolstering that, we apply Financial Policies and Procedures, Register of Interests, Donor and Gifts Policy, Complaints and Concerns policy, and a Speak up policy, amongst other relevant policies.

- 1.2 TINZ is also a chapter of the global movement of Transparency International which has an explicit ethical policy to guide our choices of advocacy and a clear and published process for adopting public policy positions, as well as ensuring an evidence-based and responsible approach to public criticism.
- 1.3 This Code of Ethical Advocacy aims to complement our existing ethics architecture by spelling out clearly the minimum standards we expect of our organisation in our commitment to being open and ethical in our advocacy activities.

2. Definitions

- 2.1 The term 'advocacy' generally encompasses a broad range of activities which seek to influence decision-making. These activities can include both mobilising public involvement to influence a decision-maker and directly engaging with a decision-maker. It is widely recognised that direct engagement by companies, associations, organisations and individuals with decision-makers can become distortive if it happens in secret, if it is conducted unethically or if disproportionate levels of influence exist. When safeguards for transparency and accountability are limited or non-existent, there is a risk of illegal, undue and unfair influence taking place.

- 2.2 For the purposes of this code, we are mostly concerned with advocacy through direct engagement with decision-makers. Hereafter advocacy refers to any communication which is made, managed or directed towards a decision-maker or person with influence (public or private sector) with the purpose of seeking to influence that person and their decisions. This includes the preparation, initiation and follow-up to the communications made. Targets of our advocacy include public decision-makers and representatives at national government, local government, public service, the private sector and non-governmental organisations and associations. In addition we advocate cross regionally or internationally, usually in alliance with other chapters of TI or with similar minded organisations.

3. Scope of Application

- 3.1 This Code explicitly outlines the commitment to ethical advocacy of TINZ personnel, Board of Directors, Members with Delegated Authority and any other person delegated to represent TINZ.

4. Guiding Principles of Ethical Conduct

- 4.1 We support and promote responsible, accountable, transparent and democratic political processes that benefit society at large. This requires explicit ethical policies of the highest standards, respecting the roles and responsibilities of the institutions and organisations we seek to engage, being open about our interactions with decision-makers and the interests we seek to advance, and being attuned to our mission and values throughout.
- 4.2 To that end, we commit to ensuring that our advocacy is consistent with our mission and values, grounded in our work, based on evidence and advancing defined public interests. We are committed to ensuring that our advocacy and policy positions are aligned with our institutional values and that we respect, protect and fulfil the basic principles as outlined in the UN Convention against Corruption, OECD Anti-Bribery Convention, UN Declaration of Human Rights and its supplementary Conventions, and the New Zealand Human Rights Act and NZ Bill of Rights Act.

5. Propriety of Influence

- 5.1 We will identify ourselves by name and organisation to those we seek to influence at the earliest appropriate opportunity.
- 5.2 We will neither intentionally misrepresent, nor look to create any false impressions, as to the true nature and status of our inquiries or requests for information.
- 5.3 We will attempt to always disseminate information that is reliable, verifiable and up-to-date.
- 5.4 We commit that the positions we take will be based on sound, objective and professional analysis and high standards of research.
- 5.5 We commit to not intentionally misrepresent public sentiment ('astro-turfing').

- 5.6 We will not engage in any other undue influence on decision-makers, including inducements, manipulation, intimidation or coercion.

6. Gifts and Hospitality

- 6.1 Under no conditions will we provide any undue advantages to decision-makers, their associates or their family members.
- 6.2 We will not offer gifts to decision-makers and any hospitality offered must be reasonable, bona fide and socially acceptable, not allowing for any impression of improper influence over the political process or the execution of their professional duties.
- 6.3 We will not accept any gift or hospitality, entertainment, loan or anything else of value from any organisation or individual if it could be reasonably construed or perceived that the gift is motivated by a wish to influence TINZ. Gifts valued between \$50 and \$200 will be registered on the Gifts Register and any gift valued above \$200 will be refused. The TINZ gifts register has governance oversight.
- 6.4 We will only invite decision-makers to events and on fact-finding trips, subject to the informative purpose being clearly evident. Only reasonable food and accommodation may be offered, and no hosting or travel of accompanying guests will be covered by our organisation.
- 6.5 We will not provide any contributions to political parties, whether financial or in-kind.

7. Pre-Employment/Contract Due Diligence and Respect for Post-Employment/Contract Rules

- 7.1 We will respect any rules incumbent on prospective personnel, particularly concerning time limitations and necessary waivers for the performance of paid and unpaid services, as well as the confidentiality of certain privileged information.
- 7.2 We will not enlist (as contractors, consultants or pro-bono representatives) any public or elected officials for the duration of their tenure or during 'cooling-off' periods required by their past offices. When recruiting such former officials (as personnel or volunteers) after they leave public office, we will carry out due diligence to ensure that no conflict of interest arises in their transition to TINZ and may suggest a proportionate 'cooling-off' period, where appropriate.
- 7.3 Where a current member of personnel or board member experiences potential conflict of interest with regard to their previously held position, such conflict will be disclosed and resolved in line with the TINZ Conflict of Interests Policy and Code of Conduct with particular sensitivity for the potential public interest at play.
- 7.4 We will not allow actions and decisions in the course of our work to be improperly influenced by the prospect of future employment or contracting with others.
- 7.5 In the case of individuals leaving TINZ for future contracts in an institution which the individual has previously sought to influence on behalf of TINZ, we will avoid any real

or perceived conflicts of interest and self-impose a 'cooling-off period' before taking up that position, where appropriate.

8. Registration, Publication and Reporting

8.1 We will register and report our advocacy efforts through any future relevant national registers of lobbying, regardless of whether the registration is mandatory or voluntary. We will provide each requested piece of information to the best of our knowledge.

8.2 We will collect and disclose the following information:

- a list of all registers in which TINZ is enlisted and reporting on our advocacy engagement
- a list of meetings in which TINZ has sought to influence a decision-making process (public or private sector), including the name of TINZ representatives present, the name of the institution or organisation (advocacy target), the name and position of the representative of the institution or organisation (respecting relevant data protection regulations), the date of the meeting, the subject matter discussed and any policy positions used in support of the advocacy effort
- the names of our advocacy personnel or volunteers and whether they have held public or elected office in the last 5 years
- any public funding received
- a list of any networks or associations that TINZ is a formal member of or substantially engaged with
- training to support this Code of Ethical Advocacy
- the present policy, and any amendments thereto.

9. Measures to ensure compliance with the Code of Ethical Advocacy

9.1 This code will be disseminated to all individuals to whom it applies (see scope of application above) and supported with practical instructions for application. All individuals to whom this code applies must confirm that they acknowledge it with their signature. In the case of contracted personnel, the signed document will be appended to their TINZ contract.

9.2 The (voluntary) ethics advisor to the Board of TINZ will oversee implementation of the code, monitor compliance, provide training and advice, and ensure periodic reporting to organisational leadership

9.3 Any violation against this code can lead to disciplinary action.

10. External dissemination

10.1 We do not anticipate implementing advocacy activities via external service providers, but if we do we undertake to ensure that those service providers are made aware of

the ethical standards that have been set in this code and that adherence to the code is included in the terms of their contract.

- 10.2 If we collaborate with other organisations on common goals, our Code of Ethical Advocacy will form one of the core agreement principles in any Memorandum of Understanding.
- 10.3 We will encourage the adoption of the Code by the advocacy coalitions and networks to which we belong.