



Kaitiaki Kai
AsureQuality

Public Records Act 2005 Audit Report

Prepared for Te Rua Mahara o te Kāwanatanga
Archives New Zealand

Final Report

July 2023

Table of Contents

1. Disclaimers	3
2. Executive Summary	4
3. Introduction	5
4. Information Management Maturity Summary	6
5. Audit Findings by Category and Topic	7
Governance	7
Self-Monitoring	9
Capability	10
Creation	11
Management	13
Storage	15
Access	17
Disposal	17
6. Summary of Feedback	20

1. Disclaimers

USE OF REPORT

This report has been prepared in accordance with the Consultancy Order Services dated 1 December 2020 and variation dated 23 September 2021. We have prepared this report solely for Te Rua Mahara o te Kāwanatanga Archives New Zealand (Archives) and AsureQuality. It was prepared at the direction of Archives and may not include all procedures deemed necessary for the purposes of the reader. The report should be read in conjunction with the disclaimers as set out in the Statement of Responsibility section. We accept or assume no duty, responsibility, or liability to any other party in connection with the report or this engagement, including, without limitation, liability for negligence in relation to the factual findings expressed or implied in this report.

INDEPENDENCE

Deloitte is independent of Archives in accordance with the independence requirements of the Public Records Act 2005. We also adhere to the independence requirements of the New Zealand Auditing and Assurance Standards Board's Professional and Ethical Standard 1 (Revised): Code of Ethics for Assurance Practitioners. Other than this audit programme, we have no relationship with or interests in Archives.

STATEMENT OF RESPONSIBILITY

The procedures that we performed did not constitute an assurance engagement in accordance with New Zealand Standards for Assurance engagements, nor did it represent any form of audit under New Zealand Standards on Auditing, and consequently, no assurance conclusion or audit opinion is provided. The work was performed subject to the following limitations:

This assessment is based on observations and supporting evidence obtained during the review. This report has taken into account the views of AsureQuality and Archives, and both have reviewed this report.

Because of the inherent limitations of any internal control structure, it is possible that errors or irregularities may occur and not be detected. The procedures were not designed to detect all weaknesses in control procedures as the assessment was performed by interviewing relevant officials and obtaining supporting evidence in line with the guidelines of the Archives Information Management (IM) Maturity Assessment.

The matters raised in this report are only those which came to our attention during the course of performing our procedures and are not necessarily a comprehensive statement of all the weaknesses that exist or improvements that might be made. We cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of operations and their responsibility to prevent and detect irregularities, including fraud. Accordingly, management should not rely on our deliverable to identify all weaknesses that may exist in the systems and procedures under examination, or potential instances of non-compliance that may exist.

We have prepared this report solely for the use of Archives and AsureQuality. The report contains constructive suggestions to improve some practices which we identified in the course of the review using the instructions and procedures defined by Archives. These procedures are designed to identify control weaknesses but cannot be relied upon to identify all weaknesses.

2. Executive Summary

EDUCATION NEW ZEALAND

Kaitiaki Kai | AsureQuality (AQ) is a State-Owned Enterprise and provides assurance services for a range of food across New Zealand. AQ consider themselves as guardians of food produced in New Zealand to ensure it is of a high standard and monitored at different points of the supply chain. This is achieved through certification, inspection, testing and training.

ASURE New Zealand and AgriQuality Limited merged in 2007 to form AQ. AQ employs approximately 1,700 staff across New Zealand. There are many offices and laboratories across the country from Dargaville to Invercargill to assist in regulating food across the nation, with the head office in Auckland.

AQ holds high-value/high-risk records including environmental sustainability data, food testing and processing data, corporate documentation records on policy and procedures relating to shareholders and the Board of Directors. In addition, inspection documentation on meat, seed inspection services, certification of food supply chain, horticulture exports, livestock farming, organic, forestry and the meat industry.

AQ does not have a standalone information management (IM) team. IM is one of the responsibilities of the ICT team, alongside providing ICT and digital services to the organisation. Due to the compliance nature of the AQ services, which require frequent reviews, IM practices are embedded to its key processes.

SUMMARY OF FINDINGS

We assessed AQ's IM maturity against the five maturity levels of Archives IM Maturity Assessment model. The results are summarised below:

Maturity Level and Number of Findings

Beginning	8
Progressing	9
Managing	3
Maturing	-
Optimising	-

3. Introduction

BACKGROUND

Archives provides IM leadership across the public sector. This is achieved through monitoring government organisations' IM practices to assure the New Zealand public that:

- Full and accurate records are created and maintained, improving business efficiency, accountability and government decision-making, and in turn, enhancing public trust and confidence in government;
- Government is open, transparent and accountable by making public sector IM practices known to the public.

Section 33 of the Public Records Act 2005 (PRA) requires that every public office has an independent audit of its record keeping practices every 5-10 years. The audit programme is part of Archives monitoring and reporting on the state of public sector IM. It is one of the key components of their Monitoring Framework, which also includes an annual survey of public sector IM and the IM Maturity Assessment.

The Chief Archivist has commissioned Deloitte to undertake these audits of certain public offices and this audit was completed in December 2022.

OBJECTIVE

The objective of the audit is to identify IM strengths and weaknesses within the public office, prioritising areas that need attention and recommending improvements. These audits assist organisations to improve their IM maturity and to work more efficiently and effectively.

SCOPE

Deloitte has undertaken an independent point-in-time assessment of AQ's IM practices against Archives IM Maturity Assessment model. The IM Maturity Assessment aligns with the PRA and Archives mandatory Information and records management standard (the Standard). Topics 17 and 19 of the Archives IM Maturity Assessment are only applicable to local authorities and have therefore been excluded for the purposes of this audit.

The IM Maturity Assessment model classifies the maturity of IM practices from "Beginning" (least mature) to "Optimising" (highest maturity level). AQ's maturity level for each topic area is highlighted under each of the respective areas. Ratings were based on the AQ's staff responses to questions during online interviews and the supporting documents provided pre-audit.

Archives provided Deloitte with the framework including the specified audit plan, areas of focus for the PRA audits, and administrative support to Deloitte. Deloitte completed the onsite audit and audit report, which Archives reviewed before release to AQ. Archives is responsible for following up on the report's recommendations with AQ.

Our audit was based on a sample of IM systems, the review of selected documentation on a sample basis, and interviews conducted with a selection of staff and focus groups. As such, this audit does not relate to an Audit as defined under professional assurance standards.

The AQ's feedback to this report is set out in Section 6.

4. Information Management Maturity Summary

This section lists the Information Management maturity level for each of the assessed topic areas. For further context refer to the relevant topic area in Section 5.

ASSESSMENT MATURITY LEVEL

Governance

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
1	IM Strategy		•			
2	IM Policy		•			
3	Governance Arrangements & Executive Sponsor	•				
4	IM Integration into Business Processes		•			
5	Outsourced Functions and Collaborative Arrangements		•			
6	Te Tiriti o Waitangi	•				

Self-monitoring

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
7	Self-monitoring		•			

Capability

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
8	Capacity and Capability	•				
9	IM Roles and Responsibilities	•				

Creation

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
10	Creation and Capture of Information			•		
11	High-Value / High-Risk Information	•				

Management

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
12	IM Requirements Built into Technology Systems			•		
13	Integrity of Information		•			
14	Information Maintenance and Accessibility		•			
15	Business Continuity and Recovery		•			

Storage

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
16	Appropriate Storage Arrangements			•		

Access

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
18	Information Access, Use and Sharing		•			

Disposal

No	Topic	Beginning	Progressing	Managing	Maturing	Optimising
20	Current Organisation-specific Disposal Authorities	•				
21	Implementation of Disposal Decisions	•				
22	Transfer to Archives	•				

Note: Topics 17 and 19 of the Archives IM Maturity Assessment are only applicable to local authorities and have therefore been excluded.

Audit Findings by Category and Topic

GOVERNANCE

The management of information is a discipline that needs to be owned top down within a public office. The topics covered in the Governance category are those that need senior-level vision and support to ensure that government information is managed to ensure effective business outcomes for the public office, our government, and New Zealanders.

Topic 1: IM Strategy

High-level statement outlining an organisation’s systematic approach to managing information across all operational environments of an organisation.	Progressing
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OBSERVATIONS

AQ does not have a documented IM Strategy (the Strategy). Current IM requirements are incorporated into AQ’s policies, accreditation, and documentation. AQ is currently drafting a Data Strategy, which will include the new requirements to centralise storing of data and processes. This Strategy aims to address aspects of IM, though will not be a standalone IM strategy.

RECOMMENDATION

Finalise and implement the Data Strategy ensuring it incorporates IM, which follows Archives’ guidance and aligns with business needs.

Topic 2: IM Policy and Processes

An information management policy supports the organisation’s information management strategy and provides a foundation for information management processes.	Progressing
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OBSERVATIONS

AQ has a current IM policy (the Policy), which covers key principles, roles and responsibilities, and relevant policies and legislation including the PRA. The Policy is available on their intranet, OneAQ and was last updated May 2022. While there is general understanding of IM requirements and roles and responsibilities, there are few localised IM processes documented. A limited number of staff were confident in their knowledge of the Policy.

The Data Strategy draft is not currently aligned with the Policy.

RECOMMENDATION

Ensure the IM policy is widely communicated and understood across AQ.

Topic 3: Governance arrangements and Executive Sponsor

The Executive Sponsor has strategic and executive responsibility for overseeing the management of information in a public sector organisation.

Beginning

OBSERVATIONS

AQ does not have a governance group which covers IM. There is a Risk Committee who manage security breaches and approve relevant policy; however, IM is not a standing agenda item. There is no reporting to this Committee on any material that relates to information/data management.

As there is no dedicated IM team, there is also no regular dialogue with the Executive Sponsor (ES), regarding IM activities within the organisation. The primary role of the ES is the Chief Operations Officer.

The ES is new to the role and has begun promoting awareness of IM. AQ has also recently established a new Head of Quality role. They will focus on implementing the Data Strategy, and centralising and improving the quality of data, which covers aspects of IM.

RECOMMENDATION

Establish an IM governance group or broaden the role of the Risk Committee to oversee IM and the implementation of the Data Strategy.

Topic 4: IM Integration into Business Processes

All staff should be responsible for the information they create, use, and maintain. Business owners should be responsible for ensuring that the information created by their teams is integrated into business processes and activities. The IM team support business owners and staff.

Progressing

OBSERVATIONS

Business owners have some understanding of their individual and team's responsibilities for managing information. For certain roles such as Compliance Managers, IM is integrated into their everyday business activity and processes, which are documented in KnowHow. KnowHow is a process maps system, which outlines key business processes. IM processes include following a set naming and filing structure. Outside of compliance workstreams, IM is more basic and ad hoc with staff determining the naming and filing structure.

AQ is supported by external contractors and one of their roles is to help improve IM processes. This includes providing support with transition from legacy systems to SharePoint, including data migration and setting up new folder structures. There is some support provided through the ICT team and the ES actively promotes IM principles.

Staff commented they know where to locate their standard operating procedures but that these are not part of the induction training at AQ.

RECOMMENDATION

Ensure that the responsibility for managing information is specifically assigned to business owners who are provided with relevant training.

Topic 5: Outsourced Functions and Collaborative Arrangements

Outsourcing a business function or activity or establishing collaborative initiatives does not lessen an organisation's responsibility to ensure that all requirements for the management of information are met.

Progressing

OBSERVATIONS

AQ has some contractual agreements with other public offices. The majority of AQ information sharing is with private companies for testing data which is not publicly available. One of the most significant contracted services contains references to information management processes and roles and responsibilities, though does not refer to the PRA.

Regular auditing is performed by Ministry for Primary Industries (MPI) which is set out by legislation rather than any information sharing agreements. MPI functions as an inspection body mandated to ensure AQ practices are up to standard.

There is no regular monitoring over contracts in place to ensure compliance with the PRA.

RECOMMENDATION

Develop a monitoring process to ensure contracted parties or shared agreements are compliant with IM requirements under the PRA.

Topic 6: Te Tiriti o Waitangi

The Public Records Act 2005 and the information and records management standard supports the rights of Māori under Te Tiriti o Waitangi/Treaty of Waitangi to access, use and reuse information that is important to Māori.

Beginning

OBSERVATIONS

Information of importance to Māori is not identified at AQ. The IM implications within the Te Tiriti O Waitangi (ToW) settlement agreements and other agreements with Māori are not known or acknowledged within the organisation.

RECOMMENDATION

Develop a process to identify information that is of importance to Māori.

SELF-MONITORING

Public offices are responsible for measuring and monitoring their information management performance for planning and improvement purposes. This helps to ensure that IM systems and processes are working effectively and efficiently. It also ensures that public offices are meeting the mandatory information and records management standard, as well as their internal policies and processes.

Topic 7: Self-Monitoring

Organisations should monitor all aspects of their information management.

Progressing

OBSERVATIONS

AQ completes an annual legislative compliance review, which consists of a declaration for senior management to approve. This review refers to the PRA, however, does not cover the Policy. The Compliance Managers are responsible for developing and monitoring IM processes for compliance. These processes are developed with the purpose of maintaining accreditation standards which include IM, rather than specifically linking to the PRA.

RECOMMENDATION

Develop a review process to monitor compliance with the Policy and IM processes by business areas outside of Compliance areas, which are covered by their own assurance processes.

CAPABILITY

Information underpins everything our public offices do and impacts all functions and all staff within the public office. Effective management of information requires a breadth of experience and expertise for IM practitioners. Information is a core asset, and all staff need to understand how managing information as an asset will make a difference to business outcomes.

Topic 8: Capacity and Capability

Organisations should have IM staff or access to appropriate expertise to support their IM programme.

Beginning

OBSERVATIONS

IM capability or capacity requirements at AQ have not been formally identified or addressed. There is some knowledge amongst staff on where to find IM support but not within AQ. Support is mainly from outside of AQ from a third-party vendor.

RECOMMENDATION

Regularly assess resourcing required to meet the business need for IM capacity and capability.

Topic 9: IM Roles and Responsibilities

Staff and contractors should be aware of their responsibility to manage information.

Beginning

OBSERVATIONS

IM responsibilities are not explicitly referenced in the roles and responsibilities for employees within their Job Description or in AQ's Code of Conduct. IM responsibilities are communicated to staff on an infrequent, ad hoc basis. It was indicated that IM is referenced in induction training but not in any depth. AQ acknowledged there is a need for IM training for staff.

RECOMMENDATION

Provide mandatory IM induction training for all staff and contractors.

CREATION

It is important to take a systematic approach to the management of government information, and this starts with an understanding of what information must be created and captured. It is expected that public offices create and capture complete and accurate documentation of the policies, actions, and transactions of government. Knowing what information assets are held by public offices is essential to IM practice.

Topic 10: Creation and Capture of Information

Every public office and local authority must create and maintain full and accurate information documenting its activities.

Managing

OBSERVATIONS

Staff have a general understanding of their responsibility to create full and accurate information to support their business function. AQ's corporate staff, who create board papers, financial information and other important documents are aware of their IM requirements. Due to the nature of AQ's work, a large portion of teams must create full and accurate records to retain accreditations. This is because AQ is audited both internally and externally by agencies such as MPI. Although these practices are completed to ensure compliance with other standards and regulations, rather than the PRA, it does support good IM practices.

AQ has some challenges to capturing full and accurate records as a result of the type of work it undertakes. For example, processing plants and factories without any mobile services need to create physical records.

SharePoint is AQ's main document repository and meets minimum metadata requirements for Archives. There is appropriate metadata routinely created to support usability and reliability of information. Access controls and permissions ensure that the information is controlled. As mentioned above, a third-party entity has also assisted in setting up the metadata. AQ does not have organisation-wide naming conventions and file management processes vary between business units. This can make it difficult for staff to find information from other business units. The Data Strategy aims to resolve inconsistency in data creation and storage across AQ.

Although the use of uncontrolled and individual environments, such as Dropbox, is actively discouraged, there are currently no restrictions in place to prevent this.

RECOMMENDATION

Develop a structured approach to monitoring environments used for creating and managing information to ensure that uncontrolled environments are not used.

Topic 11: High-Value/High-Risk Information

Staff and contractors should be aware of their responsibility to manage information. Every public office and local authority must create and maintain full and accurate information documenting its activities.

Progressing

OBSERVATIONS

AQ currently does not have an overarching Information Asset Register (IAR). There are two current registers, one for physical information only and the other for critical information from laboratory test results and employee information. However, there is no complete register of all high-risk/high-value information. Different business units have separate processes, such as Laboratories have clear classifying of high-risk/high-value information which other units do not.

There are plans to map all databases and information sources as part of the Data Strategy as way to locate all high risk/high value information across the various systems and business units.

RECOMMENDATION

Finalise identifying all high value/high-risk information and document in a complete IAR.

MANAGEMENT

Management of information should be designed into systems to ensure its ongoing management and access over time, including following a business disruption event. The information must be reliable, trustworthy, and complete and managed to ensure it is easy to find, retrieve and use, as well as protected and secure.

Topic 12: IM Requirements built into Technology Solutions

IM requirements must be identified, designed, and integrated into all of your organisation's business systems.

Managing

OBSERVATIONS

IM expertise is available and sometimes sought for new technology solutions and/or upgrades. AQ has several legacy systems and is in the process of migrating this information, which forms part of the Data Strategy. The most significant recent migration was from shared drives to SharePoint, which meets metadata requirements. Recently, AQ has engaged a third-party vendor in the commissioning of a new payroll system. Although IM expertise is involved in any new system changes or decommissioning, not all system designs and configurations are fully documented and maintained.

RECOMMENDATION

Standardised IM requirements for new and upgraded business systems are identified and documented.

Topic 13: Integrity of Information

Information should be managed so that it is easy to find, retrieve and use, while also being secure and tamper-proof.

Progressing

OBSERVATIONS

The reliability and trustworthiness of information varies across business units. As previously indicated, certain teams within AQ have their own IM processes for storing information to support reliability. There are New Zealand wide checks across all sites in place which provide AQ with monthly reviews indicating data entry errors. In addition, there is evidence of employees completing self-reviews to ensure that information is reliable and trustworthy. Frontline staff activities are monitored quarterly by MPI through mandatory inspections and samples are reviewed by management.

Each team reported they have their own processes for storing information to ensure its reliability and findability. Staff reported variable experiences with naming conventions.

RECOMMENDATION

Finalise naming conventions and document control to ensure the findability of information for staff and contractors is consistent.

Topic 14: Information Maintenance and Accessibility

Information maintenance and accessibility cover strategies and processes that support the ongoing management and access to information over time.

Progressing

OBSERVATIONS

AQ does not have a formalised strategic direction for digital information, however, do have a roadmap for planned management and maintenance of digital information during business and system changes. This includes using a test environment during system implementations to ensure the quality of information is not impacted. In addition, the ICT team minimises technology obsolescence risks by ensuring that systems are updated as new versions are released.

Risks to ongoing accessibility of physical information have not been identified or mitigated.

RECOMMENDATION

Identify and plan to address risks to ongoing accessibility of physical information.

Topic 15: Business Continuity and Recovery

This covers the capability of the organisation to continue delivery of products or services, or recover the information needed to deliver products or services, at acceptable pre-defined levels following a business disruption event.

Progressing

OBSERVATIONS

AQ has a business continuity plan (BCP), which includes recovery plans, actions required for restoring digital information, and a separate register identifies critical digital information. The BCP was last updated in 2018.

Internal systems are regularly backed up and comprehensive access controls are in place. However, there is no regular testing of the digital system backups. The BCP does not indicate any requirement for it to be tested.

Staff reported no disruption to their work when transitioning to a work from home schedule during the COVID-19 lockdowns.

RECOMMENDATION

Review the BCP to ensure it captures all critical systems and information and update as required.

STORAGE

Good storage is a very important factor for information protection and security. Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable for as long as it is required for business and legal purposes and for accountable government.

Topic 16: Appropriate Storage Arrangements

Appropriate storage arrangements for both physical and digital information ensures information remains accessible and usable throughout its life.

Managing

OBSERVATIONS

Most physical information at AQ is stored in an access-controlled storage room in the Auckland office or offsite at third-party provider. This room includes protection against fire, theft, vandalism, and misuse. Access to this storage room requires an access card which is restricted to relevant personnel. This room tends only to be accessed when employees are storing archives boxes or retrieving information for auditors. The log of attendees to the storage room is monitored to determine why each employee accessed the room. Physical information is stored in labelled boxes on shelves which is sufficient to identify information.

Protection and security processes are not tested regularly. AQ advised of no breaches or concerns regarding the protection and security of its information.

Digital information is regularly backed up. Access permissions are managed through IT with manager approval and information accidentally deleted from SharePoint is able to be retrieved.

RECOMMENDATION

Identify the protection and security risks to current storage arrangements.

ACCESS

Ongoing access to and use of information enables staff to do their jobs. To facilitate this, organisations will need mechanisms to support the findability and usability of information. Information and data that is shared between organisations is identified and managed.

Topic 18: Information Access, Use and Sharing

Staff and contractors are able to easily find and access the information they need to do their work. Access controls for information is documented and consistently applied and managed. Metadata facilitates discovery and use of information. Information and data received or shared under information sharing agreements is managed according to IM policies and processes.

Progressing

OBSERVATIONS

AQ applies access controls for both physical and digital information and these are in place across all digital systems, including restricting access to folders within SharePoint.

Staff reported they know where to save their information in SharePoint. A metadata schema is used to facilitate consistent management and discovery of information, this was established with support from a third-party vendor. Staff reported that information is stored in a relatively open environment and there is a procedure in place to gain access to restricted documents. Access controls for both digital and physical information are regularly monitored. There is ICT support to ensure that information that requires restriction, is securely restricted.

Some staff reported functional issues with the findability of information, naming conventions and taxonomy. Within business units there are ad hoc and inconsistent IM processes. Metadata doesn't meet all of Archives' minimum requirements.

RECOMMENDATION

Implement Archives' minimum metadata requirements in AQ systems where possible.

DISPOSAL

Disposal activity must be authorised by the Chief Archivist under the PRA. Public offices should have their own specific disposal authority as well as actively use the General Disposal Authorities for disposal of general or more ephemeral information. Disposal should be carried out routinely. Information of archival value, both physical and digital, should be regularly transferred to Archives (or have a deferral of transfer) and be determined as either “open access” or “restricted access”.

Topic 20: Current Organisation-Specific Disposal Authorities

This is about an organisation having its own specific disposal authority, not the implementation of the disposal actions authorised by the authority. It is not about the General Disposal Authorities.

Beginning

OBSERVATIONS

AQ does not have a current and approved organisation-specific disposal authority (DA).

RECOMMENDATION

Develop an organisation-specific DA and submit to Archives for approval.

Topic 21: Implementation of Disposal Decisions

This is about the implementation of disposal decisions, whether from organisation-specific disposal authorities or the General Disposal Authorities.

Beginning

OBSERVATIONS

AQ does not have a current DA therefore does not implement disposal under the DA.

Disposal actions under the General Disposal Authorities (GDA’s) is implemented for both physical and digital information at AQ. Information is stored with a third party provider for seven years and requires AQ’s permission to dispose of it. Each business unit is responsible for implementing disposal of its information, this is performed in an ad hoc manner.

RECOMMENDATION

Develop and communicate a process and guidance for disposal of information under the GDAs and ensure disposal is monitored.

Topic 22: Transfer to Archives

Information of archival value, both physical or digital, should be regularly transferred to Archives or a deferral of transfer should be put in place.

Beginning

OBSERVATIONS

AQ has not identified information that is older than 25 years old or of archival value.

RECOMMENDATION

Once AQ has developed their DA, identify information that is older than 25 years old or of archival value and determine whether open or restricted access.

6. Summary of Feedback

Management agrees with the reported maturity level assessment and related findings.

Management acknowledges the relatively low level of maturity in this area and are committed to improving this.

Due to the high number of recommendations provided, and associated resource implications, AsureQuality will need to prioritise which recommendations are progressed first.

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