



Party Expenses Return for the 2020 General Election

DECLARATION

1. Party name:
NEW ZEALAND FIRST PARTY

Party secretary name:
HOLLY HOWARD

COMPLETING THE RETURN

You can complete the return electronically or by hand. If you complete the form electronically each part will be automatically added up for you, as well as the totals on this page of the return.

2. ELECTION EXPENSES LIMIT FOR THE PARTY

Did you contest the party vote? Answer YES or NO	Yes	YES = \$1,199,000	\$1,199,000
Number of electorate candidates for the party	27	Number x \$28,200	\$761,400
Expenditure limit (inc GST)		Total	\$1,960,400

For information on types of electronic signatures that the Commission accepts, please see the *How to Complete Your Party Return Form* instruction sheet.

CHECKLIST

Steps 1, 2 and 4 completed on this page

Parts A to C (step 3) completed

Parts D to F (step 5) completed if party received a broadcasting allocation

Party secretary signed and dated the return

All relevant supporting documentation supplied to auditor

Auditor stamped or initialled a copy of the return to keep for own records

Auditor's report enclosed

Representation letter enclosed, if used

3. TOTAL PARTY ELECTION EXPENSES

Part A: Party advertisements promoted solely by party	\$565,336.15
Part B: Party advertisements shared with candidates or other parties	\$56,310.75
Part C: Authorised party advertisements promoted by third parties	\$0.00
Total (A + B + C)	\$621,646.90

4. PARTY BROADCASTING ALLOCATION

TOTAL ALLOCATION TO THE PARTY: \$310,931

Write 'NIL' if the party did not receive a broadcasting allocation under the Broadcasting Act

5. TOTAL PARTY ALLOCATION EXPENSES

Part D: Party only allocation expenses	\$298,788.14
Part E: Party and candidate shared allocation expenses	\$0.00
Part F: Candidate only allocation expenses	\$0.00
Total (D + E + F)	\$298,788.14

FILING THE RETURN

The return must be received by the Electoral Commission by **5pm, 17 March 2021** (within 90 working days of election day). A party secretary who fails to comply with these requirements commits an offence and may be referred to the Police.

The return can be filed:

- by post to PO Box 3220, Wellington 6140
- delivered to Level 4, 34-42 Manners Street, Wellington
- by email to: enquiries@elections.govt.nz

Reminder: the returns are open to public inspection and will be published on www.elections.nz.

6. I declare that to the best of my knowledge this return, filed pursuant to sections 206I and 206IA of the Electoral Act 1993, is an accurate record of the party's election expenses and the party's allocation expenses for the 2020 general election, and any allocation received has only been used for purposes permitted under section 80A of the Broadcasting Act 1989.

17.3.2020



To add more rows to this sheet: Enable Content, then click on the Button to insert 1 or 5 rows. Repeat to add more.

PART A: PARTY ADVERTISEMENTS SOLELY PROMOTING THE PARTY

In this part you should record all election expenses incurred in relation to party advertisements published, or that continued to be published, during the regulated period for the general election (18 August to 16 October 2020) solely promoting the party.

For advertisements published both before and during the regulated period you should apportion the costs so that only a fair proportion of the expenses are attributed to being incurred during the regulated period. Only record the amount attributable to the regulated period in the return.

Disclose the total amount incurred on election advertisements published during the regulated period even if payment for the advertising was made outside of the regulated period.

Election and referendum expenses can't be apportioned. If you published advertising during the regulated period that promoted the party and one or

more referendum options, the full cost counts as a party election expense and a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

Election expenses include:

- the costs incurred in the preparation, design, composition, printing, postage and publication of the advertisement, and
- the reasonable market value of any material used or applied towards the advertisement provided to the party for free or below reasonable market value.

Further guidance is available in the *Party Secretary Handbook – General Election and Referendums 2020*.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART A

\$565,336.15

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate	Value \$0.00 (inc GST)
EXAMPLE: Display Billboards (to: 22/09/2020 - 16/10/2020) 3 x 3 billboards: 2000mm x 1000 + m	\$1,200.00
Harry Lane, 13/7/20 - 20/10/20 Contracted web design	\$10,810.82
Mark Thomson, 8/7/20 - 10/10/20 Campaign design	\$9,500.00
Real Social, Curtis Harrington, 2/6/20 - 20/10/20, Web and digital development	\$25,293.00
Facebook, 27/7/20 - 15/10/20 Sponsored and boosted social media posts and videos	\$41,976.20
Hootsuite, 9/7/20, Stock image purchases	\$1,257.32
Shutterstock, 9/7/20 - 18/10/20 Stock image purchases	\$3,990.43
Giggle TV, 6/8/20 & 13/10/20 Digital event advertising	\$966.00
GoMedia, 31/7/20 - 4/10/21 Nationwide billboards and bus wraps	\$194,965.25
NZME, 31/7/20 - 26/11/20 Print/digital advertising promoting public meetings	\$72,367.29
STUFF, 31/8/2020 & 14/10/2020 Print advertising for events	\$11,426.77
Blair Coyle, 17/7/20 Videography for digital use	\$2,300.00
Lumiere Limited, 4/8/20, 20/8/20, 30/9/20 Videography and editing	\$43,008.85
Nation builder 1/7/20 - 8/10/20, Party vote website	\$18,646.72
BOP Business publications, 11/6/20 & 14/6/20 Greypower edition advertising	\$3,105.00
City Print Communications, 15/8/20 & 20/10/20 Fliers for promotion of Tauranga public meeting	\$8,353.60
Graphic Print and Signs Limited, 7/8/20 & 12/9/20 Hoarding printing for public meeting, signwriting van	\$2,179.25
The Print Company, 6/8/2020 - 16/8/2020, DL Flyers, A5 fliers, booklets 8 page and 12 page, Banners	\$32,022.90
North Harbour Signs, 13/7/20 - 6/8/20, Hoarding printing, 800/600 & 1200x 900, Multiple designs	\$57,866.86
Freedom Print and Design, 4/10/20 DL Flyers	\$534.75
Ribbons and rosettes, 29/7/20, 150 x rosettes	\$1,424.28
Sun Media, 14/10/20, 15x4 Colour print advert	\$719.90
Facebook, 30/7/20 - 21/9/20, on Tauranga candidate page (100% Party Vote)	\$2,721.73
Sign Creations: public meeting corflute signs for Tauranga Public meeting	\$601.45
Sun Live Media: 3x party vote advertising in Weekend Sun (25/9 20x3, 2/10 grp, 9/10 15x4)	\$2,057.35
Print Warehouse 17 July 2020 - 5mm Coreflute 2400 x 1200 Image - New Zealand First logo only - Holding hoardings for Wellington	\$2,084.95
Facebook post on Papakura candidate page (100% party vote) during election period	\$1,560.00
ELocal, Party Vote Adverts 15 and 31 Aug (Papakura)	\$1,828.50
NZME, iHeart radio (Papakura)	\$174.14



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more referendum options, the full cost counts as a party election expense and a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

Election expenses include:

- the costs incurred in the preparation, design, composition, printing, postage and publication of the advertisement, and
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TOTAL FOR PART A

\$565,336.15

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate	Value \$0.00 (inc GST)
NZME, iHeart radio (Papakura)	\$1,933.15
Hauraki Herald, print advertising, September 11th and 25th plus 9th October 2020	\$500.25
Waihi Leader and Coastal News, Print advertising - 24th September and 8th October 2020	\$355.47
The Informer - 15th and 29th September plus 13th October 2020	\$248.40
Local Advertiser (Tairua, Pauanui) - 30th September plus 14th October 2020	\$129.72
Katikati Advertiser - 24th September plus 1st and 8th October 2020	\$533.19
NZME, 20/10/20, iHeart radio, digital adverting and print run (15/10 & 16/10) Northern advocate	\$1,984.33
Wairarapa Times Age, quarter page advert, 6, 8, 10 & 11 August 2020	\$1,205.20
Reach Media, 3 October 2020 - Party DL distribution (Ohariu Electorate)	\$4,335.13
Valley Profile (monthly) - September and October 2020	\$368.00



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PART B: PARTY ADVERTISEMENTS SHARED WITH CANDIDATES OR OTHER PARTIES

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Apportionment is permitted between the party and a candidate(s) or other party(ies). Where an expense item has been apportioned between the party and candidate(s) or party(ies), record the total cost of the advertisement and the share apportioned to the party based on coverage. You should ensure there is a consistent description and approach to apportionment in each return of election expenses. Record the name of the candidate(s) or other party(ies) featured in the advertising in the item description.

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WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

			TOTAL FOR PART B	\$56,310.75
Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as name of candidate(s) and any other party featured in the advertising	Total cost (inc GST) Including preparation, design, composition, printing, publishing and postage	% apportioned as party expense	Value \$0.00 (inc GST)	
EXAMPLE: Display Billboards Ltd: 22/09/2020 - 16/10/2020: 3 x billboards: 2000 x 1000 mm. Candidates: M Brown Growth Party & J Smith National Party	\$1,200.00	20%	\$1,200.00	
QMS, Aug- Oct 2020, Billboards and buses, Fletcher Tabuteau and NZ First Party	\$7,819.42	50%	\$3,909.71	
NZME, 30/9/20 Digital ads, 2/10/20-16/10/20 Weekender print run, Fletcher Tabuteau and NZ First Party	\$1,428.30	50%	\$714.15	
Reach Media, 24/9/20, Flyer printing and delivery (32,815), Fletcher Tabuteau and NZ First Party	\$4,295.14	50%	\$2,147.57	
Allied Press, 20/8/20 Candidate and Party feature, Jamie Arbuckle and NZ First Party	\$1,828.50	50%	\$914.25	
The Social Guys, 22/10/2020, Website, meetings and campaign, Jamie Arbuckle and NZ First Party	\$1,115.50	10%	\$111.55	
Flyer Deliveries, 27/9/20, 5/10/20, 14/10/20 Party and Candidate flyers Jamie Arbuckle and NZ First	\$972.00	50%	\$486.00	
Pegasus Post/Norwest News Star Media, Mark Arneil, 3 Sept 2020, 1 and 8 Sep 2020, print ads	\$1,214.40	50%	\$607.20	
NZME, Print ad, David Wilson and NZ First Party	\$85.39	20%	\$17.08	
NZME Newspaper and digital ads, David Wilson and NZ First Party	\$1,703.00	25%	\$425.75	
Homeworld Design and Build, public meeting, David Wilson and NZ First Party	\$1,438.43	80%	\$1,150.74	
Campaign Office (branded) Jovas Trust, Strand arcade Whangarei, David Wilson and NZ First Party	\$2,300.00	50%	\$1,150.00	
Homeworld, Advertising and administration expenses, David Wilson and NZ First Party	\$6,091.93	50%	\$3,045.97	
NZME Newspaper and digital ads, David Wilson and NZ First Party	\$3,725.69	75%	\$2,794.27	
NZME Newspaper and digital ads, David Wilson and NZ First Party	\$1,984.33	75%	\$1,488.25	
Frankensignz, Signs, David Wilson and NZ First Party	\$327.75	50%	\$163.88	
Facebook, Digital marketing, David Wilson and NZ First Party	\$3,277.50	50%	\$1,638.75	
Onerahi Orbit, Print Advert, David Wilson and NZ First Party	\$160.00	20%	\$32.00	
Digital Marketing Solutions, Domain names, David Wilson and NZ First Party	\$69.00	50%	\$34.50	
Media Works Limited, Radio Advertising, David Wilson and NZ First Party	\$1,489.45	25%	\$372.36	
Bush Telegraph; Newspaper Advert. 24/8, Ron Mark and NZ First Party	\$318.55	30%	\$95.57	
Central Hawkes Bay Mail; Advert 27/8. Ron Mark and NZ First Party	\$318.55	30%	\$95.57	



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WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART B \$56,310.75

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as name of candidate(s) and any other party featured in the advertising	Total cost (inc GST) Including preparation, design, composition, printing, publishing and postage	% apportioned as party expense	Value \$0.00 (inc GST)
Bush Telegraph; Advert 7/9. Ron Mark and NZ First Party	\$373.75	30%	\$112.13
Bush Telegraph; Advert 14/9. Ron Mark and NZ First Party	\$373.75	30%	\$112.13
Central Hawkes Bay; Mail Advert 10/9. Ron Mark and NZ First Party	\$373.75	30%	\$112.13
Central Hawkes Bay; Mail Advert 17/9. Ron Mark and NZ First Party	\$373.75	30%	\$112.13
Visual Industries; Signs x 105 (1800 x1200), Ron Mark and NZ First Party	\$4,617.48	30%	\$1,385.24
Visual Industries; Art Work for Signs & Setup. Ron Mark and NZ First Party	\$155.25	30%	\$46.58
Lamb & Peters; Signs x 200 (1800 x 1200). Ron Mark and NZ First Party	\$5,290.00	30%	\$1,587.00
Lamb & Peters; Signs x 10 (1800 x 1200). Ron Mark and NZ First Party	\$897.00	30%	\$269.10
Lamb & Peters; A5 Booklets x 500. Ron Mark and NZ First Party	\$224.25	30%	\$67.28
Wairarapa Times Age (WTA) Midweek Edition; 9/9 1/4 page Advert. Ron Mark NZ First Party	\$365.70	30%	\$109.71
Lamb & Peters, Vehicle signage, Ron Mark and NZ First	\$1,262.00	50%	\$631.00
WTA Midweek; 16/9, 1/4 page Advert. Ron Mark and NZ First Party	\$365.70	30%	\$109.71
WTA Midweek; 30/9, 1/4 page Advert. Ron Mark and NZ First Party	\$365.70	30%	\$109.71
Attention Seekers: Marsh St billboard 1 September - 16 October. Party vote, with pictures of both Erika Harvey and NZ First	\$2,955.50	50%	\$1,477.75
Fuel Agency: Marketing design services for banner, business cards, social media and billboards, Erika Harvey and NZ First	\$2,300.00	50%	\$1,150.00
Fuel Agency: Billboard during month of September. Party vote, with pictures of both Winston Peters and Erika Harvey	\$5,807.50	50%	\$2,903.75
Sign Creations: extra corflute signs, 20x 1800x1200. Party vote, with pictures of both NZ First and Erika Harvey	\$1,391.50	50%	\$695.75
Umbrella Films, Shane Jones and NZ First video 6/3/20	\$2,300.00	10%	\$230.00
Design Print, Flyers 11/8/20, Shane Jones and NZ First	\$412.85	50%	\$206.43
Facebook, social media advertising , 8/7/20, Shane Jones and NZ First	\$1,598.50	50%	\$799.25
Facebook, social media advertising , 17/7/20, Shane Jones and NZ First	\$1,598.50	50%	\$799.25
Frankensignz, Car signage 2/7/20 Shane Jones and NZ First	\$701.50	50%	\$350.75
Frankensignz, Car signage 16/7/20 Shane Jones and NZ First	\$379.50	50%	\$189.75
Frankensignz, Car Signage 19/7/20 NZ First and Shane Jones	\$161.00	50%	\$80.50



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Election and referendum expenses can't be apportioned. If you published advertising during the regulated period that promoted the party, one or more candidates and one or more referendum options, the total cost of the advertisement must also be counted separately as a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

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WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART B

\$56,310.75

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as name of candidate(s) and any other party featured in the advertising	Total cost (inc GST) Including preparation, design, composition, printing, publishing and postage	% apportioned as party expense	Value \$0.00 (inc GST)
Livewire, Social media 14/10/20 Shane Jones and NZ First	\$172.50	50%	\$86.25
Livewire, Social media 2/7/20 Shane Jones and NZ First	\$1,150.00	50%	\$575.00
Livewire, Social media 22/8/20 Shane Jones and NZ First	\$3,450.00	50%	\$1,725.00
Livewire, Social media 8/9/20 Shane Jones and NZ First	\$3,000.00	50%	\$1,500.00
North Harbour Signs, Hoardings, 8/7/20, Shane Jones	\$5,980.00	50%	\$2,990.00
North Harbour Signs, Hoardings, 18/7/20, Shane Jones	\$258.75	50%	\$129.38
Wellington Suburban Newspapers 16/07/2020 - Full page "Meet the Candidate" 30/07/2020 - Page Anchor Advert "delivering experience and balance" Tracey Martin and NZ First	\$3,408.60	22%	\$749.89
Print Warehouse 28 July 2020 - 5mm Coreflute 2400 x 1200 Image t "delivering experience and balance", Tracey Martin and NZ First	\$914.25	75%	\$685.69
Go Media 1st August to 31st August - Creative Design Billboard Image - "Delivering Experience and Balance" - 24 Hutt Road Skin Tracey Martin and NZ First	\$5,002.50	75%	\$3,751.88
Wellington Suburban Newspapers 03/09/2020 and 10/09/2020 - Page Anchor Advert "delivering experience and balance", Tracey Martin and NZ First	\$1,030.40	75%	\$772.80
Stuff Limited Neighbourly Electorate Page and adverts - set up charges 31 August 2020 Tracey Martin and NZ First party	\$2,070.00	25%	\$517.50
Wellington Suburban Newspapers 13/08/2020 and 27/08/2020 - Page Anchor Advert "delivering experience and balance" Tracey Martin and NZ First	\$1,030.40	75%	\$772.80
Stuff Limited Neighbourly Electorate Page and adverts - September 2020 Tracey Martin and NZ First	\$1,035.00	25%	\$258.75
Sun Media - 11/09/2020 - public meeting advert with logo Tracey Martin and NZ First	\$391.00	10%	\$39.10
Go Media 1st September to 17th September and 18th September to 16th October 2020 - Creative Design Billboard Image - "Delivering Experience and Balance" - 24 Hutt Road Skin Tracey Martin and NZ First	\$4,197.50	75%	\$3,148.13
NZME - September /2020 - public meeting advert with logo Tracey Martin and NZ First	\$546.48	10%	\$54.65
Clutha Print, 20000Mails, 1/10/20 Mark Patterson and NZ First	\$1,795.00	50%	\$897.50
Distribute 4132 Mails Mark Patterson and NZ First	\$775.00	50%	\$387.50
Clutha Leader, 8/8/20 and 23/9/20, Mark Patterson	\$177.74	25%	\$44.44
My little local ad, Mark Patterson and NZ First	\$196.00	50%	\$98.00
Facebook digital advertising Mark Patterson and NZ First	\$300.00	50%	\$150.00



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Item description <i>Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as name of candidate(s) and any other party featured in the advertising</i>	Total cost (inc GST) <i>Including preparation, design, composition, printing, publishing and postage</i>	% apportioned as party expense	Value \$0.00 (inc GST)	
Pro Signs Vehicle wrap, Anthony Odering and NZ First	\$598.00	90%	\$538.20	
Monsta Vision, Electronic Billboard Anthony Odering and NZ First	\$1,150.00	90%	\$1,035.00	
James Print Greymouth, Fliers 13 September, Jackie Farrelly and NZ First party	\$401.35	90%	\$361.22	



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PART D: PARTY ONLY BROADCASTING ALLOCATION EXPENSES

You must complete Parts D to F if the party received an allocation of money for broadcasting pursuant to Part 6 of the Broadcasting Act 1989 to produce or place advertising on television, radio or the internet for the 2020 general election and referendums

Advertising paid for using the broadcasting allocation is excluded from the definition of party election expense. However, it is not excluded from the definition of referendum expense. If you use the allocation to produce and publish advertising during the regulated period that promoted one or more referendum options, the

cost of the advertisement must also be counted separately as a referendum expense. You only need to complete a referendum return if your party spends over \$100,000 on referendum advertising in respect of either referendum during the regulated period.

In Part D you should record details of all expenses incurred using the broadcasting allocation promoting the party or attacking another party or candidate or encouraging people to vote or not to vote in a particular way in a referendum.

WRITE 'NIL' IF YOU HAVE NO EXPENSES TO DECLARE HERE:

TOTAL FOR PART D **\$298,788.14**

Supplier's name and street address This should be the production company, media buyer or broadcaster on the invoice provided to the Electoral Commission for payment of the account	Invoice date or dates	Description of allocation expenses List the total production costs, television placement, radio placement and internet placement costs for each supplier separately	Value \$0.00 (inc GST)
MEDIAWORKS 17 Hargreaves Street, St Marys Bay Auckland	31/10/2020	IN 610506-2 Radio advertising 1-16/10/20	\$43,333.52
MEDIAWORKS 17 Hargreaves Street, St Marys Bay Auckland	31/10/2020	IN 610532-2 Pre-roll and Rectangle banners 29/9 - 16/10	\$10,222.22
MEDIAWORKS 17 Hargreaves Street, St Marys Bay Auckland	30/9/2020	IN 610506-1 Radio advertising September	\$8,430.65
MEDIAWORKS 17 Hargreaves Street, St Marys Bay Auckland	30/9/2020	IN 610506-2 Pre-roll and Rectangle banners 29/09/20-16/10/20, radio advertising 1-16/10/20	\$1,277.78
RADIO TARANA, Ground Floor, 155 New North Road, Eden Terrace Auckland	30/9/20	IN 34146-1 Radio Advertising September radio advertising 1-12/10/20	\$202.40
RADIO TARANA, Ground Floor, 155 New North Road, Eden Terrace Auckland	31/10/2020	IN 34210-1 Radio advertising 1-12/10/20	\$4,395.88
STUFF Cider Building, 4 Williamson Ave, Auckland 1010	24/11/20	IN SUN004/1120 September Nationwide digital rectangle banners	\$25,875.00
STUFF Cider Building, 4 Williamson Ave, Auckland 1010	24/11/2020	IN SUN005/1120 September Nationwide digital pre-roll	\$25,874.99
STUFF Cider Building, 4 Williamson Ave, Auckland 1010	30/9/2020	IN SEP/STATEMENT Internet placement September - video pre-roll nationwide and rectangle banners nationwide	\$34,500.00
NZME 2 Graham street, Auckland 1010	30/9/2020	IN 33388946-2 Internet placement - video and general advertising	\$24,943.49
NZME 2 Graham street, Auckland 1010	31/10/2020	IN 33489900-2 Digital	\$55,556.46
NZME 2 Graham street, Auckland 1010	31/10/2020	IN 33494470 Radio advertising, drive and afternoon October and September	\$54,546.74
NZME 2 Graham street, Auckland 1010	30/9/2020	IN 33399979 Radio advertising September	\$9,629.01



AK



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INDEPENDENT ASSURANCE REPORT

To the Party Secretary of New Zealand First Incorporated

Qualified Opinion

We have undertaken a reasonable assurance engagement of the Party Expenses Return for the 2020 General Election ("the return") of New Zealand First Incorporated ("the Party").

The purpose of the engagement is to determine the Party's compliance, in all material respects, with the requirements of Electoral Act 1993, section 206I (return of the party's election expenses) for the period 18 August to 16 October 2020, and section 206IA (return of the party's broadcasting allocation expenses) for the period 13 September to 16 October 2020 ("the requirements").

In our opinion, except for the effects of the matters described in the Basis for Qualified Opinion paragraph below, the position stated in the return in respect of:

- a) the requirement that the Party's total election expenses did not exceed the maximum amount prescribed by section 206C is correct, and
- b) the Party's broadcasting allocation expenses is, in all material respects, correct.

Basis for Qualified Opinion

We conducted our engagement in accordance with Standard on Assurance Engagements (SAE) 3100 (Revised) Compliance Engagements issued by the New Zealand Auditing and Assurance Standards Board, and believe the evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion.

We were unable to obtain sufficient appropriate evidence about the Party's compliance in respect of the following matters:

- We are not the auditor of the Party's electorates and accordingly were unable to assess the completeness of election expenses incurred by the electorates.
- Funds outside of the Party may have been used to settle election expenses and our access to information regarding such expenses is deficient.
- Materials used for advertisements may have been provided free of charge, or below reasonable market value and there are no practical audit procedures to determine whether they have been comprehensively recorded or not.
- The correct accounting for election expenses between candidates and the Party may be incomplete.

We were unable to satisfy ourselves by alternative procedures, therefore qualify our conclusion in this regard.

Party Secretary's Responsibilities for the Return

The Party Secretary is responsible on behalf of the Party for:

- a) The compliance activity undertaken to meet the requirements.
- b) Identification of risks that threaten compliance with the requirements being met, and controls which will mitigate those risks and monitor ongoing compliance.

Our Independence and Quality Control

We have complied with the relevant ethical requirements relating to assurance engagements, which include independence and other requirements based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with the Professional and Ethical Standard 3 (Amended), we maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Assurance Practitioner's Responsibilities

Our responsibility is to express an opinion on, and SAE 3100 (Revised) requires that we plan and perform our procedures to obtain reasonable assurance about, whether the Party has complied, in all material respects, with the requirements.

We perform procedures in order to obtain evidence about the compliance activity and controls implemented to meet the requirements. The procedures selected depend on our judgement, including the identification and assessment of risks that material non-compliance with the requirements is likely to arise.

Other than in our capacity as the Party's independent assurance practitioners, we have no relationship with, or interests in, the Party.

Inherent Limitations

Because of the inherent limitations of an assurance engagement, together with the internal control structure, it is possible that fraud, error, or non-compliance with compliance requirements may occur and not be detected.

A reasonable assurance engagement throughout the specified periods does not provide assurance on whether compliance with the requirements will continue in the future.

Restricted Use

This report has been prepared for use by the Party Secretary for the sole purpose of establishing whether the Party has complied with the requirements. No responsibility is accepted by us for any reliance on this report by any person other than the Party Secretary, or for any other purpose other than that for which it was prepared.



Lennie & Associates
Auckland
17 March 2021

NEW ZEALAND FIRST

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Feilding
4040

16 March 2021

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Auckland 1541

Letter of Representation for Party Return of Expenses for the 2020 General Election

This representation letter is furnished in connection with the return of party election expenses and broadcasting allocation expenses for the 2020 general election (the return) by New Zealand First (the Party) made in accordance with sections 206I and 206IA of the Electoral Act 1993 (the Act) which has been subject to an assurance engagement and reported on by you in accordance with sections 206L and 206LA of the Act.

I understand that your assurance engagement was conducted in accordance with the relevant provisions of the Act and the applicable Auditing and Assurance Standards issued by the New Zealand Auditing and Assurance Standards Board.

I confirm and take responsibility for the following representations after taking all reasonable steps to assure myself of them:

- 1 The return has been prepared in accordance with the relevant provisions of the Act.
- 2 I am responsible for establishing and maintaining a system of internal control designed to provide reasonable assurance as to the integrity and reliability of the return. I have done this, and all explanations or demonstrations of this to you have been complete and accurate.
- 3 All records, documents and accounts (records) have been kept by the Party (including subsidiary entities) and made available to you, and these materials will be retained in accordance with the requirements of the Act.
- 4 I have disclosed to you:
 - 4.1 any material transactions not disclosed in the records;
 - 4.2 the existence of all relevant agreements or activities relating to the Party's members of the previous Parliament, electorate candidates, subsidiary or closely connected political entities, third party promoters (whether registered or not), and other political parties (whether registered or not) or their electorate candidates;

- 4.3 any alleged, suspected or proven illegal activity under the Act or other legislation potentially relevant to the return or instances of non-compliance with applicable requirements;
 - 4.4 any outstanding disputed claims, matters with authorities, or planned or continuing litigation; and
 - 4.5 the fact of, and results from, any assessment made by me that considered whether the records of the Party may be materially misstated or incomplete for any reason; any design deficiencies in the compliance system and instances where that system has not operated as described.
- 5 I have sought, received, and hold in the Party's records confirmation from, or on behalf of, any Party members of the previous Parliament that all party advertisements published, or election expenses incurred by those members of Parliament have been disclosed to me, with adequate supporting records, for inclusion in this return.
- 6 The return contains the total returnable expenses of the Party for the 2020 general election whether paid or incurred before, during, or after the regulated period. The return includes all expenses, including apportioned expenses, and irrespective of the source of funds or entity paying for the activities concerned, and irrespective of whether or not an advertisement contained a promoter statement.
- 7 Parts A to C of the return's contents have been determined by considering, in the following sequence, these questions and the relevant provisions of the Act:
- 7.1 Was the advertising undertaken by the party secretary, or with their authority? [definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).
 - 7.2 If yes - did the advertising constitute **publishing**? [definition of **publish**, section 3D; definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).
 - 7.3 If yes - was that the publishing of a **party advertisement**? That is, did the advertisement encourage or persuade, or appear to encourage or persuade, voters to vote for the party, or against another party, or both? [definition of **party advertisement**, section 3(1); definition of **election expenses**, section 206(1)] (If no, advertising is not a party election expense).
 - 7.4 If yes - was the advertising undertaken (or deemed to be undertaken) during the regulated period (from 18 August to 16 October 2020)? [definition of **regulated period**, section 3B; definition of **election expenses**, section 206(1)] (If no, advertising is not an election expense).

- 7.5 If yes:
- 7.5.1 What expense was incurred in undertaking the advertising? [definition of **advertising expenses**, section 3E; definition of **election expenses**, section 206(1)]
 - 7.5.2 What cost was involved in respect of the preparation, design, composition, printing, distribution, postage and publishing of the party advertisement? [section 3E(1)(a)(i)]
 - 7.5.3 What was the reasonable market of any **material** used for or applied toward the party advertisement, including material provided free of charge, or below reasonable market value? [section 3E(1)(a)(ii)]
 - 7.5.4 Was the advertisement a **joint party advertisement** [section 206CB], or a **joint party and candidate advertisement** [section 206CC]? (If yes, the costs can be apportioned based on coverage).
 - 7.5.5 Was the advertisement published before the regulated period and continued to be published during the regulated period [section 206CA]? (If yes, the costs can be apportioned with the costs attributed to the regulated period counted).
- 7.6 Do any of the costs identified above fall within any of the election expense exceptions? [section 3E(1)(b)]
- 7.6.1 The conduct of any survey or public opinion poll (other than push-polling).
 - 7.6.2 Framework, other than a commercial framework, supporting a hoarding displaying the party advertisement.
 - 7.6.3 The labour of any person provided free of charge by that person.
 - 7.6.4 Replacement of election materials damaged in circumstances out of the party's control.
 - 7.6.5 Expenses, including running costs, of a vehicle used to display a party advertisement (provided payment was not made or promised) for the display of the advertisement on the vehicle.
 - 7.6.6 Allocations from the Electoral Commission of money for election broadcasting [definition of **election expenses**, section 206(1)(c)].
- If yes, that specific cost is not an election expense.
- 7.7 Where an apportionment of election expenses is given in the return:

- 7.7.1 the basis of apportionment is appropriate, and has been properly applied and recorded; and
 - 7.7.2 the information contained in the Party's return is known to be consistent with that of the Party's electorate candidates, or the undertakings of other entities involved in the apportionment included in the records.
- 8 Where the Party received a broadcasting allocation for the 2020 general election Parts D to F have been determined by considering these questions and the relevant provisions of the Electoral Act 1993 (the Electoral Act) and Part 6 of the Broadcasting Act 1989 (the Broadcasting Act):
- 8.1 Was the allocation used by the Party to produce, broadcast or publish election programmes on television, radio or election advertisements on the internet for the 2020 general election? [definition of **election programme, broadcasting costs, production costs and publishing costs**, section 69(1) Broadcasting Act; definition of **election advertisement**, section 3A Electoral Act] (If no, advertising is not an allocation expense).
 - 8.1.1 If the allocation was used for **broadcasting costs** - was the placement on television or radio during the **election period** (from 13 September to 16 October 2020)? [definition of **election period**, section 69(1) Broadcasting Act] (the allocation cannot be used for broadcasting costs on radio or television outside of the election period).
 - 8.1.2 If the allocation was used for **publishing costs** - was the placement on the internet during the **election period**? (the allocation can only fund publishing costs during the election period. Parties can spend their own funds on internet placement costs before and during the election period and those costs must be declared as election expenses in Parts A-C if the election advertising was published in the regulated period (see 7.4 above)).
 - 8.1.3 If the allocation was used for **production costs** what cost was involved in respect of the preparation, design, composition and creation of the programme or advertisement? [section 69(1) Broadcasting Act]. Parties can spend their own funds on production costs before and during the election period and those costs must be declared as election expenses in Parts A to C if the production costs are for election advertisements that were published in the regulated period (see 7.4 above)).
 - 8.2 Was the allocation spent on any **advertising that promoted the party and a candidate** [section 70(2) of the Broadcasting Act and section 205EA and 206CC of the Electoral Act]? (If yes, the Party must report the total amounts spent on joint party and candidate advertising in Part E of the return and the percentage coverage provided to the Party and candidate. The candidate will need to report the value apportioned to

the candidate as candidate election expenses and a donation from the Party in the candidate's return of expenses and donations).

8.3 Was the allocation spent on **advertising that solely promoted a candidate** [section 70(3) of the Broadcasting Act]? (If yes, the Party must report the amounts spent on candidate only advertising in Part F of the return and the candidate will need to include the costs as candidate election expenses and a donation from the party in the candidate's return of expenses and donations).

8.4 Has the Party reported details of all accounts sent by the Party to the Electoral Commission under section 80B(1) of the Broadcasting Act in respect of expenditure of the party's allocation? [section 206IA of the Electoral Act]. The Commission pays suppliers' invoices that have been certified by an authorised party official as payable from the party's broadcasting allocation. With the exception of internet advertising placement costs paid directly by the party (for example, Facebook promoted posts), payments are made to suppliers and no money is paid directly to parties in accordance with the requirements of section 80B of the Broadcasting Act.

9 Any and all misstatements you have identified during the course of your assurance engagement have been adjusted in the final return.

10 I have completed my own procedures, distinct from your assurance engagement processes, to evaluate the accuracy and completeness of the return.

11 The return is free of any material misstatements or omissions.

These representations are made in terms mutually agreed between us, and to supplement information obtained by you from the records of the Party and to confirm information given to you orally.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Holly Howard', with a long horizontal line extending to the right.

Holly Howard
Party Secretary