



# Party Expenses Return for the 2020 General Election

## DECLARATION

1. Party name:  
Vision New Zealand

Party secretary name:  
Anne Williamson

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  5 Number x \$28,200  \$141,000

Expenditure limit (inc GST) Total  \$1,340,000

3. TOTAL PARTY ELECTION EXPENSES

Part A: Party advertisements promoted solely by party  \$67,438.66

Part B: Party advertisements shared with candidates or other parties  \$24,034.04

Part C: Authorised party advertisements promoted by third parties  \$111.85

Total (A + B + C)  \$91,584.55

4. PARTY BROADCASTING ALLOCATION

TOTAL ALLOCATION TO THE PARTY:  \$53,840

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  \$48,147.93

Part E: Party and candidate shared allocation expenses  \$0.00

Part F: Candidate only allocation expenses  \$2,875.00

Total (D + E + F)  \$51,022.93

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.

SIGNATURE  DATE 05/03/2021

## 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.

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

## 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](http://www.elections.nz).

Further information on party expenses is available in the *Party Secretary Handbook - General Election and Referendums 2020*.

**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 a 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 Elect and Referendums 2020*.

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

TOTAL FOR PART A

\$67,438.66

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 Ltd 22/09/2020 - 16/10/2020: 3 x Billboards: 2000mm x 1000mm	\$1,200.00
Print&Stitch 20 branded Tshirts 10/01/20 - 16/10/20	\$600.00
Graphics on Shirts, Tshirts 30/01/20 - 16/10/20	\$3,584.90
3ACopy&Design, 300 A5 Flier 31/01/20 16/10/20	\$126.51
Artech Print, 400 Vision NZ Brochure, 13/02/20 - 16/10/20	\$975.20
Graphics on Shirts, 50 Tshirts 10/06/20 - 16/10/20	\$1,236.25
Banarect Mack Marketing, Pop Up Bannerstands, 12/06/20 - 16/10/20	\$414.00
3APrint&Design, 4xAO Posters, 17/06/20 - 16/10/20	\$253.00
3APrint&Design, Transparent Vinyl 400mmx25mm, 17/06/20 - 16/10/20	\$103.50
Graphics on Shirts 30x Tshirts, 38 crop hoodie, 02/07/20 - 16/10/20	\$2,609.12
ID Solutions, 200 Tshirts, 200 Sweatshirts 08/07/20 - 16/10/20	\$17,275.00
Jazz Brand Projections, 1000 Lapel Badges, 2000 Button Badges 23/07/20 - 16/10/20	\$5,313.00
ID Solutions, 91Tshirts, 23/07/20 - 16/10/20	\$2,370.00
Panda Inspire, 200 x Election Signs, 900x600mm, 28/08/20 - 16/10/20	\$2,110.25
ID Solution, 100 Tshirts, 14/08/20 - 16/10/20	\$5,476.40
Boost Promo, 1000 Pens with Party Logo 20/08/20 - 16/10/20	\$980.95
Panda Inspire 30 Billboards Large and medium, 25/09/20 - 16/10/20	\$807.30
Panda Inspire 344 Billboards, 2400x1200 28/08/20 - 16/10/20	\$10,395.68
Panda Inspire 100 corflut Sign Rockers 1200x600mm 2/10/20 - 16/10/20	\$1,015.45
Panda Inspire 50 corflut Sign Rockers 1200x600mm 9/10/20 - 16/10/20	\$626.75
ID Solutions, Tshirts, 15 Tshirts, 17 Sweatshirts 23/07/20 - 16/10/20	\$1,326.00
Artech Print, 400 Vision NZ Brochure, 13/03/20 - 16/10/20	\$975.20
Tote Bag Bannerstands, Media Wall, 7/11/2019 - 16/10/20	\$6,675.75
A4 Party Brochure, 21/11/2019 - 16/10/20	\$732.55
A5 Cards, Advertising Party 21/11/2019 - 16/10/20	\$71.30
Party Pens & Notebook, 12/12/2019 - 16/10/20	\$1,384.60

**PART B: PARTY ADVERTISEMENTS SHARED WITH CANDIDATES OR OTHER PARTIES**

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

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.

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.

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 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 Elections and Referendums 2020*.

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

TOTAL FOR PART B

\$24,034.04

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 (loc: 22/08/2020 - 16/10/2020) 3x Billboards: 1000x1000mm. Candidates: M Brown, Growth Party, & T Smith, Neutral Party	\$6,000.00	20%	\$1,200.00
Panda Print, 28/08/20-16/10/20, 2400x1200, 500 billboards, 334 party, 166	\$15,360.55	82%	\$12,641.73
Panda Print, 28/08/20-16/10/20, 2400x1200, 35 billboards, party&candidate	\$1,409.67	25%	\$352.42
Artech Print, A5 Flier, 50,000, 28/08/20 - 16/10/20 HTamaki and party,	\$2,355.20	25%	\$588.80
Artech Print, A5 Flier, 14,000, Public Meeting 21/09/20 HTamaki & party	\$2,320.01	25%	\$580.00
Artech Print, A5 Flier, 7400, Public Meeting 15/09/20 HTamaki & party	\$1,320.20	25%	\$330.05
Artech Print, A5 Flier, 5000, 15/09/20-16/10/20 HTamaki & party	\$899.30	25%	\$224.83
Artech Print, A5 Flier, 500, 8/09/20 event, HTamaki & party	\$197.80	25%	\$49.45
Artech Print, A5 Flier, 120,000, 21/09/20-16/10/20, HTamaki & party	\$4,581.60	50%	\$2,290.80
3A Copy&Design, A5 Flier, 20,000, 10/09/20-16/10/20, HTamaki & party	\$2,121.52	50%	\$1,060.76
Future Print, Door Hanger, 330mx130m, 28/09/20-16/10/20, party, party o	\$8,395.00	35%	\$2,938.25
3A Copy&Design, A5 Flier, 200, 30/07/20	\$109.25	50%	\$54.63
Warehouse Stationery, 15, A4 Flier, featuring party & PWiniata, 29/09/20	\$62.85	50%	\$31.43
Warehouse Stationery, 50, A4 Flier, featuring party & PWiniata, 1/10/20	\$209.50	50%	\$104.75
Warehouse Stationery, 25, A4 Flier, featuring party & Pwiniata, 08/10/20	\$104.75	50%	\$52.38
3A Copy&Design, A5 Flier, 100 17/06/20-16/10/20, SWilcox & party	\$74.76	50%	\$37.38
3A Copy&Design, A5 Flier, 100 26/06/20-16/10/20, PWiniata & party	\$74.76	50%	\$37.38
3A Copy&Design, A5 Flier, 100 29/06/20-16/10/20, DMurphy & party	\$74.76	50%	\$37.38
Election Hoardings 2400x1200 Party/Candidate; HTamaki, SWilcox, DMurph	\$5,099.52	50%	\$2,549.76
3A Copy&Design, A5 Flier, 300 31/07/20-16/10/20	\$143.76	50%	\$71.88

**PART C: AUTHORISED PARTY ADVERTISEMENTS PROMOTED BY A THIRD PARTY PROMOTER**

In this part you should record all election expenses incurred in relation to party advertisements promoted by a third party promoter with your written authorisation and published, or that continued to be published, during the regulated period for the general election (18 August to 16 October 2020). Expenses cannot be apportioned with third party promoters. If you authorised someone else to publish advertising encouraging people to vote for the party, the cost of the advertising will be a party election expense and the same costs will also be an election expense of the third party. Record the name of the third party promoter in the item description. Election and referendum expenses can't be apportioned. If a third party published advertising during the regulated period that promoted the party and one or more referendum options, the total cost of the advertisement must be counted separately as both a referendum expense and an election expense by both the party and the third 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 regulated period even if payment for the advertising was made outside of the regulated period.

**Election expenses include:**

- the costs incurred in the preparation, design, composition, printing, postal 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 Elections and Referendums 2020*.

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

**TOTAL FOR PART C**

**\$111.85**

Item description Provide details of the type of advertisement, name of advertiser or supplier, volume, duration and size as appropriate as well as the name of the third party which promoted the advertising.	Value \$0.00 (inc GST)
EXAMPLE: Display Advertising Ltd: 1/06/2020 - 30/09/2020: 3 x 8 boards: 2000mm x 1000mm Workers Limited	\$1,200.00
Get out to vote Campaign, 300x A5 Fliers, Advertising a youth event Young Vision Logo on it 3/	\$111.85
Proton Productions LTD <i>[Signature]</i>	







# Independent Assurance Report

---

**Grant Thornton New Zealand Audit Limited**  
L4, Grant Thornton House  
152 Fanshawe Street  
P O Box 1961  
Auckland 1140  
[www.grantthornton.co.nz](http://www.grantthornton.co.nz)

## **Reasonable Assurance Report on the National Management Board of Vision New Zealand Party's compliance with Sections 206I and 206IA of the Electoral Act 1993 as evaluated against the Party's Election Expenses Return**

To the National Management Board

### Opinion

We have undertaken a reasonable assurance engagement on the National Management Board of Vision New Zealand Party's (the "Party") compliance, in all material respects, with Sections 206I and 206IA of the Electoral Act 1993 (the "Act") (other than assessing whether the expenses included in the Return exceed the maximum amount prescribed by section 206C of the Electoral Act 1993), in all material respects, as evaluated against the Party's Election Expenses Return (the "Return") for the 2020 General Election.

In our opinion, the Party has complied, in all material respects with the Act as evaluated against the Return (other than assessing whether the expenses included in the Return exceed the maximum amount prescribed by section 206C of the Electoral Act 1993).

### Conclusion

We have undertaken a limited assurance engagement on the Party's compliance, in all material respects, whether the expenses included in the Return exceed the maximum amount prescribed by section 206C of the Electoral Act 1993 ("Section 206") for the 2020 General Election.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the expenses included in the Party's Return, have not complied in all material respects, with the maximum amounts as set out in Section 206 for the 2020 General Election.

### Basis for Opinion and Conclusion

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.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion and conclusion.

### The National Management Board's Responsibilities

The National Management Board is responsible for:

- a) The compliance of the Return evaluated against the Act for the 2020 General Election.
- b) Identification of risks that threaten the compliance requirements identified above 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 founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with the Professional and Ethical Standard 3 (Amended) issued by the New Zealand Audit and Assurance Standards Board, the Grant Thornton New Zealand Audit Limited maintains 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

#### *Reasonable assurance*

Our responsibility is to express an opinion on the Party's compliance, in all material respects, with the Act (other than assessing whether the expenses incurred exceed the maximum amount prescribed by section 206C of the Electoral Act 1993) for the 2020 General Election. 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 Act for the 2020 General Election.

An assurance engagement to report on the Party's compliance with the Act involves performing procedures to obtain evidence about the compliance activity and controls implemented to meet the requirements of the Act. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance of the Return as evaluated against the criteria within the Act.

#### *Limited assurance*

Our responsibility is to express a limited assurance conclusion on the Party's compliance, in all material respects, with Section 206C for the 2020 General Election. SAE 3100 (Revised) requires that we plan and perform our procedures to obtain limited assurance about whether anything has come to our attention whether, the Party has not complied, in all material respects, with the Section 206C for the 2020 General Election.

In a limited assurance engagement, the assurance practitioner performs procedures, primarily consisting of discussion and enquiries of management and others within the entity, as appropriate, and observation and walk-throughs, and evaluates the evidence obtained. The procedures selected depend on our judgement, including identifying areas where the risk of material non-compliance with Section 206 is likely to arise.

Given the circumstances of the engagement, in performing the procedures listed above we:

- Obtained an understanding of the Party's compliance framework and internal control environment through discussion, enquiries and observation to satisfy the Return meet the requirements of Section 206.
- Reconciled all expenses paid through the Party's bank accounts to its accounting records and the Return.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and consequently the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Accordingly, we do not express a reasonable assurance opinion on compliance with the compliance requirements.

Other than in our capacity as the independent assurance practitioners we have no relationship with, or interests in, the Vision New Zealand 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.



An assurance engagement does not provide assurance on whether compliance with the Act will continue in the future.

**Restricted Use**

This report is made solely to the National Management Board of the Vision New Zealand Party. Our compliance work has been undertaken so we can state to the Party those matters undertaken and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Party for our compliance work, or for any other purpose other than that for which it was prepared.

**Grant Thornton New Zealand Audit Limited**

*Grant Thornton*

Auckland

11 March 2021



Thursday 11<sup>th</sup> March 2020

Darrell Phiri / Ryan Campbell  
Grant Thornton  
L4, Grant Thornton House  
152 Fanshawe Street  
PO BOX 1961  
Auckland 1140

Dear Darrell and Ryan,

**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 by Vision New Zealand Political 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 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, and other political parties 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). If yes:

- 7.4.1 What expense was incurred in undertaking the advertising? [definition of **advertising expenses**, section 3E; definition of **election expenses**, section 206(1)]
  - 7.4.2 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)]
  - 7.4.3 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)]
  - 7.4.4 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).
  - 7.4.5 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).
- 7.5 Do any of the costs identified above fall within any of the election expense exceptions? [section 3E(1)(b)]
- 7.5.1 The conduct of any survey or public opinion poll.
  - 7.5.2 Framework, other than a commercial framework, supporting a hoarding displaying the party advertisement.
  - 7.5.3 The labour of any person provided free of charge by that person.
  - 7.5.4 Replacement of election materials damaged in circumstances out of the party's control.
  - 7.5.5 Expenses, including running costs, of a vehicle used to display a party advertisement for the display of the advertisement on the vehicle.
  - 7.5.6 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.

- 7.6 Where an apportionment of election expenses is given in the return:

- 7.6.1 the basis of apportionment is appropriate, and has been properly applied and recorded; and
- 7.6.2 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



**Anne Williamson**  
Party Secretary  
**Vision New Zealand**