



FINANCIAL SERVICES FEDERATION

Competition Law Policy

The Financial Services Federation (FSF) is the industry body representing the responsible and ethical finance, leasing, and credit-related insurance providers of New Zealand. We have over 90 members and affiliates providing these products to more than 1.7 million New Zealand consumers and businesses. Our affiliate members include internationally recognised legal and consulting partners.

From time to time the FSF will organise events with multiple members who are competitors. At these events members will absolutely not indulge in any discussion or behaviour which could in any way be construed as being anti-competitive or which might be seen as restrictive or cartel practices under the Commerce Act 1986. Any anti-competitive behaviour within the FSF membership will not be tolerated and will be seen as a breach of the FSF's Rules and Code of Conduct. The Rules, at 7.12.1(c) and 9.15, outline the disciplinary procedure for such breaches.

The main events that this policy concerns are any meetings of the FSF and its members and working group meetings. The working group meetings cover seven core topics (Insurance, People & HR, Legal & Compliance, Wheels, Leasing, Fraud and Tax & Finance) and a few special interest groups that don't meet as regularly (Insurance Premium Funders, Debt Collection, Non-Bank Deposit Takers and Specialist Housing Lenders). The purpose of the working group meetings is to discuss issues common to members of the group, to share best practice ideas as to how to manage these issues, to hear from experts in relevant areas, to receive information on any aspects of change to legislation or regulation that will affect their business and provide the opportunity for members from FSF member organisations to network with each other.

To ensure that all meetings comply with Competition Law the FSF has the following policies in place:

- Comprehensive minutes will be taken at General Meetings, the Annual General Meeting and any meeting of the FSF's Executive Committee. These can be provided to the Commerce Commission at their request;
- Meetings of FSF Working Groups will be minuted and distributed to attendees. FSF will also keep copies of the minutes of all FSF Working Group meetings. These can also be shared with the Commerce Commission at their request.

Further information about the FSF's stance on anti-competitive behaviour is reiterated in:

- The most recent copy of the FSF's rules that members must adhere to. This can be found [here](#).
- The most recent copy of the FSF's Code of Conduct. This can be found [here](#).

- The Terms of Reference for the Insurance Working Group. This can be found [here](#).
- The Terms of Reference for the People & HR Working Group. This can be found [here](#).
- The Terms of Reference for the Legal & Compliance Working Group. This can be found [here](#).
- The Terms of Reference for the Fraud Working Group. This can be found [here](#).
- The Terms of Reference for the Wheels Working Group. This can be found [here](#).
- The Terms of Reference for the Leasing Working Group. This can be found [here](#).
- The Terms of Reference for the Tax & Finance Working Group. This can be found [here](#).

Members will be annually sent this policy to ensure they are fully aware of its content.

Updates to this Policy

From time to time, we may update this policy. Updated versions of this policy will be posted on our website. We encourage you to frequently check for changes.

This version of the Financial Services Federation's Competition Law Policy was adopted by the Executive Committee at its meeting on 16 February 2026.