

# Party Donations and Loans Return for the year ending 31 December 2024

## DECLARATION

### 1. Party name:

The New Zealand Labour Party

### Party secretary name:

Robert Salmond

### 2. TOTAL PARTY DONATIONS

Complete Parts A to G on pages 2 to 12 if you have any donations to declare.

Write 'NIL' if you have **NO** donations, or contributions to a donation, in Parts A to G

**Part A:** Party donations of more than \$5,000

\$452,766.53

**Part C:** Anonymous party donations of more than \$1,500

\$0.00

**Part D:** Overseas party donations of more than \$50

\$0.00

**Part F:** Donations protected from disclosure

\$0.00

**Part G:** Other party donations up to \$5,000

\$ 1,174,947.39

**Total Party Donations (A + C + D + F + G)**

\$ 1,627,713.92

**Total monetary and non-monetary donations received by party**

**Total Monetary Party Donations**

\$ 1,627,713.92

**Total Non-Monetary Party Donations**

\$ 0.00

### 3. TOTAL PARTY LOANS

Complete Parts H and I on pages 13 to 14 if you have any loans to declare.

Write 'NIL' if you have **NO** loans to declare

NIL

**Part H:** Party loans exceeding \$15,000

\$0.00

**Part I:** Party loans between \$1,500 – \$15,000

\$ 0.00

**Total (H + I)**

\$ 0.00

4. I declare that to the best of my knowledge this return contains all donations and loans information required pursuant to sections 210 and 214C of the Electoral Act 1993, is an accurate record of the party donations and loans and is not false in any material particular.

SIGNATURE



DATE: DD / MM / YYYY

24/04/2025

## COMPLETING THE RETURN

You can complete the return electronically or by hand.

If you complete the return electronically amounts entered will automatically be formatted as currency (so no need to type \$ or commas) and the totals in each part will be automatically added up for you, as well as the totals on this page of the return.

If you do not have any donations and/or loans to declare enter 'NIL' in **step 2** and/or **step 3** on this page before completing the declaration at **step 4**.

An audit report is required if the total party donations exceed \$50,000 or there are any party loans disclosed in Parts H or I of the return.

## CHECKLIST

Step 1 completed

☐

Parts A to I completed or 'NIL' entered at step 2 and/or step 3

☐

Party secretary signed and dated the return

☐

All relevant supporting documentation supplied to auditor, if applicable

☐

Auditor stamped or an initialled copy of the return to keep for own records, if applicable

☐

Auditor's report enclosed, if applicable

☐

Representation letter enclosed, if used

☐

## FILING THE RETURN

The return needs to be signed and dated by the party secretary and be accompanied by an auditor's report, if applicable. The signed return and the auditor's report must be received by the Electoral Commission by **Wednesday, 30 April 2025**.

The return can be filed:

- by email to: [legal@elections.govt.nz](mailto:legal@elections.govt.nz)
- by delivery to Level 4,  
34-42 Manners Street,  
Wellington 6011

**Reminder:** the returns are open to public inspection and will be published on [www.elections.nz](http://www.elections.nz).

SAVE AS

PRINT





# DONATIONS Complete Parts A to G

## Party Donations

A party donation is a donation of money (or the equivalent of money), goods or services that is made to a party, or to any person or body of persons if there are reasonable grounds to believe that the donation is intended for the benefit of the party. A party donation includes:

- a donation of money or the equivalent of money, including where a person pays something for the party
- where a party is provided with goods or services free of charge that have a reasonable market value of more than \$1,500 (or \$50 if provided by an overseas person – see Part D for more information on who is an overseas person)
- where a party is provided with discounted goods or services and the reasonable market value of the goods or services is greater than \$1,500 (or \$50 if provided by an overseas person); the difference between the contract or agreed price and the reasonable market value of the goods or services is a donation

- when a party sells over-valued goods or services, the difference between the price paid and the reasonable market value is a donation (for example a fundraising auction or dinner)
- where credit is provided to a party on more favourable terms than those prevailing at the same time for similar credit, the value of the favourable terms is a donation.

### The following are not a party donation:

- free labour
- goods or services provided free of charge to a party, or to any person on the party's behalf, that have a reasonable market value of \$1,500 or less (or \$50 or less if from an overseas person), or
- a candidate donation that is included in a candidate's return of donations.

## PART A: PARTY DONATIONS OF MORE THAN \$5,000

### Instructions for Part A – Donations over \$5,000

Party donations of more than \$5,000 (including GST) received during 2024 are required to be declared in **Part A**, including a series of donations received from the same donor during the year that add up to more than \$5,000. Also include those donations exceeding \$20,000 received during election year and reported under section 210C (this only applies to an annual return for the year ending in the year of the general election).

Do not include in **Part A** contributions to donations, anonymous or overseas donations, donations protected from disclosure, or donations not exceeding \$5,000 (see **Parts B, C, D, E, F and G**).

You need to record the name and street address of the donor, the date the donation was received and the amount received from the donor. Where you have received a number of donations from the same donor you should include each date on which a donation was received from the donor and the aggregated total from the donor. You also need to confirm whether any person (other than the donor) has contributed more than \$5,000 to the donation (or more than \$50 if the contributor is an overseas person). Contributions of more than \$5,000 must be disclosed in **Part B** (or **Part E** for overseas contributors).

For any donations from a trust, include the name of the individual at whose direction the donation was made.

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

**TOTAL FOR PART A**

**\$452,766.53**

Donor's name and street address	Date donation or aggregated donations received dd/mm/yyyy	Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO	Amount of donation or total aggregated donations (including GST) \$0.00
1 SMELLIE HON ROBERT, Grace Joel Retirement Village, 59/184 St Heliers Bay Road, St Heliers, Auckland 1071	08/04/2024	NO	\$ 45,000.00
2 ESTATE of JONES ELIZABETH, Selwyn Heights, 656/42 Herd Road, Hillsborough, Auckland 1042	09/07/2024	NO	\$ 30,668.67
3 MILLS PHILLIP, 6 Cremome Street, Herne Bay, Auckland 1011	24/06/2024	NO	\$ 25,000.00
4 HUBBARD RICHARD, 114 Hensman Road, Queenstown 9300	24/06/2024	NO	\$ 20,000.00
5 HODGSON HON PETE, 25 Stevenson Avenue, Sawyers Bay, Port Chalmers 9023	fortnightly, monthly, 19/09/2024	NO	\$ 17,912.00
6 POLLOCK HELEN, 32 Albert Road, Devonport, Auckland 0624	monthly	NO	\$ 12,360.00
7 HIPKINS RT HON CHRIS, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 12,331.19
8 DAVIS PETER, 4 Cromwell Street, Mt Eden, Auckland 1024	monthly, 24/06/2024	NO	\$ 11,160.00
9 CLARK RT HON HELEN, 4 Cromwell Street, Mt Eden, Auckland 1024	monthly, 24/06/2024	NO	\$ 11,020.00



# **PART A: PARTY DONATIONS OF MORE THAN \$5,000**

	<b>Donor's name and street address</b>	<b>Date donation or aggregated donations received dd/mm/yyyy</b>	<b>Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO</b>	<b>Amount of donation or total aggregated donations (including GST) \$0.00</b>
10	RURAWHE RT HON ADRIAN, c/- Parliament Buildings, Wellington	fortnightly, monthly, 23/05/2024, 11/09/2024	NO	\$ 9,563.87
11	UTIKERE TANGI, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 9,434.13
12	SEPULONI HON CARMEL, c/- Parliament Buildings, Wellington	fortnightly, 11/05/2024, 13/10/2024	NO	\$ 9,009.13
13	BOYACK-MAYER RACHEL, c/- Parliament Buildings, Wellington	fortnightly, monthly, 31/05/2024	NO	\$ 8,884.26
14	MCANULTY HON KIERAN, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 8,727.14
15	BELICH CAMILLA, c/- Parliament Buildings, Wellington	fortnightly, monthly, 12/09/2024	NO	\$ 8,709.73
16	O'CONNOR GREG, c/- Parliament Buildings, Wellington	fortnightly, 23/02/2024, 16/08/2024, 03/09/2024	NO	\$ 8,624.58
17	RUSSELL HON DEBORAH, c/- Parliament Buildings, Wellington	fortnightly, 11/05/2024, 15/06/2024, 22/09/24	NO	\$ 8,253.16
18	PARKER HON DAVID, c/- Parliament Buildings, Wellington	fortnightly, quarterly	NO	\$ 7,640.17
19	DAVIDSON REUBEN, c/- Parliament Buildings, Wellington	fortnightly, monthly, 10/04/2024	NO	\$ 7,467.66
20	SALESA HON JENNY, c/- Parliament Buildings, Wellington	fortnightly, monthly, 12/10/2024	NO	\$ 7,140.16
21	SOSENE LEMAUGA LYDIA, c/- Parliament Buildings, Wellington	fortnightly, 16/10/2024, 18/10/2024	NO	\$ 7,120.16
22	BROOKING HON RACHEL, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 7,060.16
23	HENARE HON PEENI, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 7,029.56
24	VERRALL HON AYESHA, c/- Parliament Buildings, Wellington	fortnightly, monthly, 11/05/2024	NO	\$ 7,027.08
25	CLEINE WARRICK, 102 Utopia Road, Westport 7892	6/1/2024	NO	\$ 8,000.00
26	WEBB HON DUNCAN, c/- Parliament Buildings, Wellington	fortnightly, 05/04/2024, 11/05/2024	NO	\$ 6,996.32
27	TINETTI HON JAN, c/- Parliament Buildings, Wellington	fortnightly, 11/05/2024, 16/09/2024	NO	\$ 6,985.16
28	PRIME HON WILLOW-JEAN, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 6,940.16
29	LUXTON HON JO, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 6,940.16
30	RADHAKRISHNAN HON PRIYANCA, c/- Parliament Buildings, Wellington	fortnightly, 11/05/2024	NO	\$ 6,840.16
31	O'CONNOR HON DAMIEN, c/- Parliament Buildings, Wellington	fortnightly, 03/09/2024	NO	\$ 7,030.16
32	TANGAERE-MANUEL CUSHLA, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16
33	TWYFORD HON PHIL, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16

# **PART A: PARTY DONATIONS OF MORE THAN \$5,000**

	<b>Donor's name and street address</b>	<b>Date donation or aggregated donations received dd/mm/yyyy</b>	<b>Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO</b>	<b>Amount of donation or total aggregated donations (including GST) \$0.00</b>
34	LEARY INGRID, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16
35	JACKSON HON WILLIE, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16
36	EDMONDS HON BARBARA, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16
37	ANDERSEN HON GINNY, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,820.16
38	WOODS HON MEGAN, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 6,751.98
39	WHITE HELEN, c/- Parliament Buildings, Wellington	fortnightly, 11/05/2024	NO	\$ 6,666.98
40	WILLIAMS ARENA, c/- Parliament Buildings, Wellington	fortnightly	NO	\$ 6,631.98
41	MCLELLAN TRACEY, c/- Parliament Buildings, Wellington	fortnightly, monthly, 11/05/2024, 13/07/2024	NO	\$ 6,364.26
42	LEWIS DAVID, 45a Duart Road, Havelock North 4130	monthly	NO	\$ 6,000.00
43	HALBERT SHANAN, c/- Parliament Buildings, Wellington	fortnightly, monthly	NO	\$ 5,909.19
44	BENNETT GLEN, c/- Parliament Buildings, Wellington	fortnightly, quarterly	NO	\$ 5,701.25
45	UNDERWOOD RACHEL, 14 Rimu Road, Kelburn, Wellington 6012	monthly	NO	\$ 5,500.00
46	KWOK Glenn, 42 Entrican Avenue, Remuera, Auckland 1050	04/12/2024, 06/12/2024	NO	\$ 5,445.00
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# **PART A: PARTY DONATIONS OF MORE THAN \$5,000**

	<b>Donor's name and street address</b>	<b>Date donation or aggregated donations received dd/mm/yyyy</b>	<b>Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO</b>	<b>Amount of donation or total aggregated donations (including GST) \$0.00</b>
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# **PART A: PARTY DONATIONS OF MORE THAN \$5,000**

	<b>Donor's name and street address</b>	<b>Date donation or aggregated donations received dd/mm/yyyy</b>	<b>Does the donation contain contributions from another person of more than \$5,000? Enter YES or NO</b>	<b>Amount of donation or total aggregated donations (including GST) \$0.00</b>
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## PART B: CONTRIBUTIONS OF MORE THAN \$5,000

### Instructions for Part B – Contributions over \$5,000

A contribution is money, goods or services that makes up a donation or is included in a donation or has been used to wholly or partly fund a donation, that was given to the donor or a person who was expected to pass the contribution to the donor. Only complete **Part B** if the donation in **Part A** includes a contribution, from someone other than the donor, exceeding \$5,000.

For each contribution in **Part B** you will need to provide:

- the name and street address of each contributor
- the line number of the donation in **Part A** that the contribution was part of and the date the donation was received
- the amount of each contribution made by the contributor, or in the case of multiple contributions, the total amount of the contributions from the same person to the donation during the year.

**WRITE 'NIL' IF YOU HAVE NO CONTRIBUTIONS TO DECLARE HERE:**

100

**TOTAL FOR PART B**

**\$0.00**

[illegible]



### Instructions for Part C - Anonymous donations over \$1,500

### Anonymous overseas donations over \$50

In **Part C** you must declare:



### Instructions for Part D – Overseas donations over \$50

**An overseas person is:**

- If a donation from an overseas person is over \$50 (either on its own or when aggregated with all other donations made by or on behalf of the same overseas person during the year) the party is entitled to keep \$50 and within 20 working days must either return the excess to the donor or pay the excess to the Electoral Commission.

- the name and street address of the overseas person; and
- the date the donation was received or, in the case of multiple donations, the date each donation was received; and
- the amount of the donation or, in the case of aggregated donations, the total amount of the donations; and
- the amount returned to the overseas person or paid to the Electoral Commission, and the date of that return payment.

NIL

**\$0.00**

## PART D



### Instructions for Part E – Overseas contributions over \$50

In **Part E** you must declare:

- NIL

**\$0.00**

## PART E

## PART F: DONATIONS PROTECTED FROM DISCLOSURE

### Instructions for Part F – Donations protected from disclosure

A donation protected from disclosure enables a person to make an anonymous donation of more than \$1,500 to a registered party without their identity being disclosed to either the public or the party receiving the donation.

The current maximum amount that an individual or body can donate to any one party through this process is \$58,257 between two successive elections. No party may currently receive more than \$388,380 from donations protected from disclosure between two successive elections.

In **Part F** you must declare:

- the date the payment was received
- the amount of the payment
- the amount of any interest included in the payment

**WRITE 'NIL' IF YOU HAVE NO DONATIONS TO DECLARE HERE:**

NIL

**TOTAL FOR PART F**

\$0.00
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[illegible]



**Instructions for Part G – Other party donations up to \$5,000**

- anonymous party donations of \$1,500 or less
- all other donations not exceeding \$1,500
- party donations of more than \$1,500 up to an

**Example:**

**WRITE 'NIL' IF YOU HAVE NO DONATIONS TO DECLARE HERE:**

## PART G

LOANS Complete Parts H and I

Party Loans exceeding \$15,000

A party loan is a written or oral agreement under which a lender lends money to a political party. Money lent by a registered bank at a commercial interest rate is not a party loan, nor are credit cards and overdraft facilities with registered banks.

PART H: PARTY LOANS EXCEEDING \$15,000

Instructions for Part H – Party loans exceeding \$15,000

Party loans from the same lender exceeding \$15,000 entered into during the year (including those exceeding \$30,000 that have been reported during the year under section 214F) must be reported in Part H.

Loans from the same lender need to be aggregated. Include loans entered into during the year not exceeding \$15,000, but that exceed \$15,000 when aggregated with all other loans from the same lender during 2024 or unpaid balances as at 31 December 2024 of any loans provided by the same lender in any previous year.

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

TOTAL FOR PART H

\$0.00

Lender's name and street address	Loan amount (including GST) \$0.00	Date loan entered into dd/mm/yyyy	Repayment date (if no repayment date, specify "no repayment date" here)

Guarantor's name and street address (if any)	Unpaid balance of loan \$0.00	Interest rate or rates	Details of security given

Total aggregated loan amount from the same lender (if applicable)

Any terms (that enable the lender to reduce or extinguish the loan amount and/or interest or grant any concession in respect of repayment)

Lender's name and street address	Loan amount (including GST) \$0.00	Date loan entered into dd/mm/yyyy	Repayment date (if no repayment date, specify "no repayment date" here)

Guarantor's name and street address (if any)	Unpaid balance of loan \$0.00	Interest rate or rates	Details of security given

Total aggregated loan amount from the same lender (if applicable)

Any terms (that enable the lender to reduce or extinguish the loan amount and/or interest or grant any concession in respect of repayment)



## PART I: PARTY LOANS BETWEEN \$1,500 – \$15,000

### Instructions for Part I – Party loans between \$1,500 – \$15,000

The total number and value of all other party loans entered into during the year of \$1,500 or more up to and including \$15,000, that have not already been disclosed in **Part H**, must be disclosed in **Part I**.

If a lender has made more than one loan to the party of between \$1,500 and \$15,000 each loan should be counted separately when calculating the total number of loans, for the purposes of **Part I**.

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

	TOTAL FOR PART I	\$ 0.00
	Number of loans	Total amount of loans (including GST)\$0.00
Loans of not less than \$1,500 and not more than \$15,000		

# Independent Assurance Report

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**Grant Thornton New Zealand Audit Limited**  
L15, Grant Thornton House  
215 Lambton Quay  
PO Box 10712  
Wellington 6140  
T +64 4 474 8500  
[www.grantthornton.co.nz](http://www.grantthornton.co.nz)

## Reasonable Assurance Report on compliance with the Sections 210 and 214C of the Electoral Act 1993 (Direct engagement)

### To the New Zealand Council of the New Zealand Labour Party

#### Opinion

We have undertaken a reasonable assurance engagement on The New Zealand Council of the New Zealand Labour Party's (the "Party") compliance, in all material respects, with the Sections 210 and 214C of the Electoral Act 1993 ("the Act") as evaluated against the Donations and Loans Return ("the Return"), for the year ended 31 December 2024.

#### Qualified Opinion

In our opinion, except for the effects of the matters described in the Basis for Qualified Opinion section of our report, the Party has complied, in all material respects, with the requirements of the Act as evaluated against the Return for the year ended 31 December 2024.

#### Basis for Qualified Opinion

With the exception of donations received via the online donation portal, there are limited controls that ensure donations included in the Return are complete. We were unable to obtain sufficient appropriate evidence and therefore qualify our opinion in this regard. Consequently, we could not determine whether any adjustments to the amount of donations revenue recorded was necessary.

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.

#### The Party's Responsibilities

The Party is responsible for:

- a. Preparation of the Return in compliance with the requirements of the Act.
- b. Identification of risks that threaten the compliance with the Act identified above being met and controls which will mitigate those risks and monitor ongoing compliance.



### **Our Independence and Quality Management**

We have complied with the independence and other ethical requirements of Professional and Ethical Standard 1 *International Code of Ethics for Assurance Practitioners (including International Independence Standards) (New Zealand)* issued by the New Zealand Auditing and Assurance Standards Board, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies Professional and Ethical Standard 3 *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, which requires the firm to design, implement and operate a system of quality management including policies or 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 the Party's compliance, in all material respects, with the Act as evaluated against the Return, for the year ended 31 December 2024. 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 as evaluated against the Return, for the year ended 31 December 2024.

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 Act. The procedures selected depend on our judgement, including the identification and assessment of risks of material non-compliance with the Act as evaluated against the Return.

Other than in our capacity as auditor of the Party for the year ended 31 December 2024 and providing taxation and advisory services, we have no other 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 for the year ended 31 December 2024 does not provide assurance on whether compliance with the Act will continue in the future.

### **Restricted Use**

This report is made solely to the Party in accordance with the requirements of the Act. 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**



**J Du Toit**  
**Partner**  
**Wellington**

**24 April 2025**



Grant Thornton  
L15, Grant Thornton House  
215 Lambton Quay  
PO Box 10712  
Wellington 6140

## New Zealand Labour Party

Head Office

04 384 7649  
reception@labour.org.nz  
PO Box 784, Wellington

 /NZLabourParty  
 @NZLabour  
 @NZLabour

Attention: Jacques Du Toit

24 April 2025

Dear Partners

### Representation Letter

This representation letter is provided in connection with the return of party donations and loans for the 2024 calendar year (the return) by the New Zealand Council of the New Zealand Labour Party Incorporated (the "Party") and entities it controls as listed in Appendix A ("the Group") made in accordance with sections 210 and 214C of the Electoral Act 1993 (the Act) which has been subject to an assurance engagement and reported on by you in accordance with sections 210A and 214D of the Act.

We understand that your assurance engagement was conducted in accordance with the relevant provisions of the Act and the applicable assurance standards issued by the New Zealand Auditing and Assurance Standards Board (SAE 3100 Assurance Engagements on Compliance).

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

- The return has been prepared in accordance with the relevant provisions of the Act.
- We acknowledge our responsibility for the preparation of the return in compliance with the Act, including identifying the risks that threaten the compliance requirements being met, and designing, implementing and maintaining internal controls to mitigate those risks, including the risk of fraud, so that those risks will not prevent achievement of the compliance requirements.
- 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.
- For all donations over \$50 (other than anonymous donations), we have established and implemented processes to ensure that all reasonable steps in the circumstances have been taken to check whether a donation is made by or on behalf of an overseas person or includes a contribution made by or on behalf of an overseas person.
- We have disclosed to you to the best of our knowledge:
  - Any material transactions not disclosed in the records;
  - 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;
  - The fact of, and results from, any assessment made by us 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; and
  - Any events subsequent to the period covered by the Donations Return that could have a significant effect on the assurance practitioner's conclusion.
- The return contains the total returnable donations received by the Party in the 2024 calendar year. The return includes:
  - Donations in the form of money, goods or services paid for by others, discounts given on goods or services provided to the party, premiums paid in respect of goods or services provided by the party, and credit provided to the party at terms more favourable than the prevailing commercial terms, including the value of GST on any of those items;
  - Donations of more than \$15,000 in aggregate from an individual donor;
  - Donation contributions of more than \$1,500 from an individual contributor that add up to more than \$15,000 in aggregate from that contributor;
  - Anonymous donations and overseas donations of more than \$1,500;
  - Donation contributions from an overseas person of more than \$50;
  - Payments received from the Electoral Commission of donations protected from disclosure;
  - The number of, and aggregate amount of, anonymous donations, and overseas donations, of \$1,500 or less;
  - The number of, and aggregate amount of, donations of more than \$1,500 but not more than \$5,000;
  - The number of, and aggregate amount of, donations of more than \$5,000 but not more than \$15,000.
- The return also includes all party loans, specifically:
  - Any loans entered into during the year that exceed \$15,000;
  - Any loans exceeding \$15,000 entered into in any previous year (from 25 March 2014) that have an unpaid balance exceeding \$15,000 as at 31 December 2024;
  - Any loans entered into during the year of less than or equal to \$15,000 if the loan exceeds \$15,000 when aggregated with all other loans entered into during the year by the same lender and any unpaid balances of any loans from the same lender in any previous year (from 25 March 2014);
  - The number and aggregate amount of all other loans entered into during the year of not less than \$1,500 and not more than \$15,000.
- The return's contents have been determined by considering the requirements contained within the return and the relevant provisions of the Act.
- Where an assessment has been made of the reasonable market value of a donation, the basis of the assessment is fair and appropriate, and has been properly applied and recorded.
- Any and all misstatements you have identified during the course of your assurance engagement have been adjusted in the final return.
- We have completed our own procedures, distinct from your assurance engagement processes, to evaluate the accuracy and completeness of the return.
- 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.

For and on behalf of

The New Zealand Council of the New Zealand Labour Party:

A handwritten signature in black ink, appearing to read 'Rob Salmond', with a long horizontal stroke extending from the end of the signature.

Rob Salmond

General Secretary