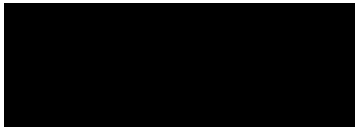


13 April 2026



By email: 

Kia ora 

FORMAL COMPLAINT – CODE OF CONDUCT – MARTYN BOYCE

Thank you for your email.

We are writing to advise that we have reviewed the complaint documents provided and the allegations you have made, and that Horizons has decided to take no further action in relation to your complaint.

As you note in your letter, this complaint relates to an affidavit filed in legal proceedings. We understand that the proceedings are the liquidation proceedings that you and other members of the group 'inLandsAirWater Counsel' were involved with against Manawatu Whanganui LASS Limited ("MW LASS"). MW LASS is now seeking to recover the costs it was put to as a result of defending the group's unsuccessful liquidation application against it. In our view, this course of action is consistent with Mr Boyce's role with MW LASS, not contrary to it.

Having reviewed Mr Boyce's affidavit, we do not agree that the contents of it breach any of the standards of conduct that you refer to. Mr Boyce's affidavit is neutral in tone, factual, and sets out material relevant to MW LASS's application for costs against you and the other respondents. We cannot see how it presents any form of misconduct, including under the provisions of the Local Government Act 2002 or the Companies Act 1993 that you have cited. We certainly disagree that its contents are fraudulent or dishonest, as you have claimed.

We also make the following brief comments in relation to the remaining allegations made in your complaint:

- We are advised that all the information you refer to was collected from publicly available websites or public records. There has therefore been no unauthorised access to any confidential information.
- All the relevant Information Privacy Principles in the Privacy Act 2020 recognise exceptions where collection or disclosure of information relates to, among other things, the conduct of proceedings before any court (IPP 2(2), 3(4), 10(1)(e), and 11(1)(e)). We therefore do not consider there has been any breach of the Privacy Act 2020.

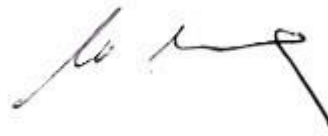
- Documents filed as evidence in legal proceedings are protected by absolute privilege (Defamation Act 1992, section 14), so your suggestion that the affidavit is defamatory is not correct.
- Similarly, as this document is evidence in a court proceeding, we do not consider that the Harmful Digital Communications Act 2015 or the Harassment Act 1997 apply to it (though I note that these acts are outside Horizons' purview in any case).

For these reasons, and as stated above, we have decided to take no further action in respect of this complaint.

Yours sincerely,



Michael McCartney
CHIEF EXECUTIVE



Colin Morris
PRIVACY OFFICER