



TCF Code Compliance Framework

Half Year Report

November 2025

CCF Report

This report contains information on the operation of the TCF Code Compliance Framework (CCF) for the period from 1 April 2025 to 30 September 2025.

The information in this report has been compiled by the TCF Compliance Officer for the TCF Board.

Recommendations

It is recommended that the Board:

- **Note** this report.

Overview

- The end of the Compliance Year is 31 March.
- There are no companies in breach of compliance due to unreturned annual certification forms for the year ended 31/03/2025.
- There have been no Code compliance issues raised through the CCF.

Compliance Statistics at a Glance

Category	Amount this half-year	Amount this year
Allegations of Breach Received	0	0
Code Signatories found in breach	0	0
Code Signatories complained about, but found not in breach	0	0
Code Signatories that have resolved breaches within proposed resolution timeframes	0	0
Code signatories that have had sanctions applied	0	0
Active Compliance Management Issues on hand	0	0

Code Reviews

Code reviews completed

The following code reviews have been completed since the last Compliance Report.

- Broadband Marketing Code
- Copper and PSTN Transition Code.

The codes were endorsed by the TCF Board in October 2025. Companies will shortly be invited to sign up to the new versions of the codes.

Existing Codes under review

The following codes are currently under review by Working Parties:

- Emergency Calling Code
- Scam Prevention Code

Codes due for review

In accordance with the TCF's Code review policy, the following codes are due for review. The TCF will prioritise the Code reviews in the coming year. Some codes will not require any amendment and therefore will rollover to the following cycle, subject to TCF member approval.

- Broadband Product Disclosure Code – the timeframe for review of this code is dependent on the Commerce Commission's RSQ workstream timeline.
- Disconnection Code
- Co-Siting Code
- Fibre Customer Transfer Code
- Mobile Messaging Services Code
- Product Stewardship Re:Mobile Scheme Code – this code will be reviewed as part of the product stewardship scheme accreditation work.
- Unauthorised Use of Mobile Phones in Prisons Code

Code Summary

A summary of the TCF Codes and signatories is set out in the Appendix to this Report.

Compliance Issue Management

Compliance Management at a Glance

The table below provides a full breakdown of the number and percentage of Compliance Issues, split across a number of metrics.

The Compliance Officer has not received any Notices of Potential Breach during the first half of the compliance year (1 April 2025 to 30 September 2025).

Complaint Metric	Total this half-year	Total Annual
Complaints by TCF Code		
Customer Care Code	0 (0%)	0 (0%)
Broadband Marketing Code	0 (0%)	0 (0%)
Complaints by Type		
Complaints against TCF Members	0 (0%)	0 (0%)
Complaints against Non-TCF Members	0 (0%)	0 (0%)
Self Reported Breaches	0 (0%)	0 (0%)
Complaints made by One Signatory against Another	0 (0%)	0 (0%)
Complaints Raised by a Valid Third Party	0 (0%)	0 (0%)
Breach raised by Compliance Officer	0 (0%)	0 (0%)
Stage 1-4 Notices		
Notice of Potential Breach Received (Stage 1)	0	0
Complaints Determined to be Invalid (Stage 1)	0 (0%)	0 (0%)
Compliance Issues Notices Issued (Stage 2)	0 (0% of Stage 1 notices received)	0 (0% of Stage 1 notices received)
Investigations where No Breach is Found (Stage 3)	0 (0% of Stage 1 notices received)	0 (0% of Stage 1 notices received)
By Compliance Officer	0 (0%)	0 (0%)
By Enforcement Agent	0 (-%)	0 (0%)
Notices of Confirmed Breach Issued (Stage 4) (excludes Stage 3 notices where decisions are pending)	0 (0% of Stage 1 notices received)	0 (0% of Stage 1 notices received)
By Compliance Officer	0 (0%)	0 (0%)
By Enforcement Agent	0 (0%)	0 (0%)

Escalation		
Complaints Investigated by Compliance Officer	0 (0%)	0 (0%)
Complaints Investigated by Enforcement Agent	0 (0%)	0 (0%)
Audits Carried Out	0	0
Appeals Raised	0	0
Sanctions		
Sanctions Applied	0	0
Compliance Issues Resolved	0	0

Sanctions

There are currently **0** sanctions in effect.

Additional Compliance Activities

TCF Code overview presentations for TDR

Over the last six months, the Compliance Officer has given a series of presentations to TDR practitioners and TDR members. These presentations provided an overview of each of the TCF codes, covering the origins of the codes and the key requirements of each. The presentations were intended to provide TDR members with a refresher on the obligations of the codes they are signed up to, and practitioners with an overview of code requirements to help understand what codes might be in play when working through a complaint. The sessions also provided an opportunity for TDR practitioners and members to discuss the types of complaints that may be related to certain codes and seek clarification from the TCF on specific code requirements.

Engagement with TDR on reporting processes

The Compliance Officer is working with the CEO of TDR to refine processes for TDR engagement with TCF on compliance matters. The aim is to develop four agreed and documented processes:

- Code interpretation – formal request for clarification from TDR to TCF.
- Code breach notification – process for TDR to notify TCF of any findings from their dispute resolution process that mention code breach, but where TDR do not necessarily think further action is required, either because the breach was incidental and non-systemic, or because the remedy adequately addressed the issue.
- Escalation of code breach issues – process for notification of a breach that TDR believe requires further investigation under the CCF. There is an existing notice of potential breach form for this purpose, but an alternative version that is streamlined for TDR use will be developed. TCF would follow the standard compliance issue management process to investigate the issue.
- Notification of code concern/systemic issue – notification by TDR to TCF of concerns around code drafting, including areas where there is inadequate protection.

Appendix – TCF Code Summary Report

Note: The Broadband Marketing Code and Copper and PSTN Transition Code have been omitted from this summary report, as companies have not yet been invited to sign up to the updated versions of these codes.

Code Name:	Broadband Product Disclosure Code		
Report Year:	2025		
Code Type:	Mandatory	Date Effective:	7/07/2022
Subject to CCF:	Yes	Date Endorsed:	7/04/2022
Code Status:	Active	Next Review Date:	7/07/2023
Number of Signatories:	11	Review Notes:	To be reviewed 12 months

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Current
Lightwire	Hamilton	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

Code Name:	Co-Siting Code		
Report Year:	2025		
Code Type:	Voluntary	Date Effective:	1/12/2007
Subject to CCF:	No	Date Endorsed:	1/12/2007
Code Status:	Active	Next Review Date:	1/12/2021
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
Fortysouth	Auckland	Yes	Current
Kordia Limited	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current

Code Name:	Customer Care Code
Report Year:	2025

Code Type:	Mandatory	Date Effective:	15/06/2023
Subject to CCF:	Yes	Date Endorsed:	15/06/2023
Code Status:	Active	Next Review Date:	15/06/2025
Number of Signatories:	20	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Current
Lightwire	Hamilton	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
MyRepublic	Auckland	No	Current
Northpower Fibre	Whangarei	Yes	Current
Nova Energy		No	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Primo Wireless	Inglewood	No	Current
Sky		No	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current
Unifone New Zealand Ltd	Dunedin	No	Current
Vector Communications	Auckland	Yes	Current
VoIPLine Telecom Pty Ltd	Auckland	No	Current

Code Name:	Disconnection Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	21/10/2016
Subject to CCF:	Yes	Date Endorsed:	21/10/2016
Code Status:	Active	Next Review Date:	21/10/2018
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
Devoli	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

Code Name:	Emergency Calling Code
Report Year:	2025

Code Type:	Mandatory	Date Effective:	21/10/2022
Subject to CCF:	Yes	Date Endorsed:	21/07/2022
Code Status:	Active	Next Review Date:	21/07/2024
Number of Signatories:	12	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Electric Kiwi	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Kordia Limited	Auckland	Yes	Current
Lightwire	Hamilton	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
NOW New Zealand Limited	Hawkes Bay	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Symbio Networks		Yes	Current

Code Name:	Fibre Customer Transfer Code - non-regulated
Report Year:	2025

Code Type:	Voluntary	Date Effective:	26/08/2022
Subject to CCF:	Yes	Date Endorsed:	26/05/2022
Code Status:	Active	Next Review Date:	26/05/2024
Number of Signatories:	9	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Devoli	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
Northpower Fibre	Whangarei	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current

Code Name:	Fibre Installation Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	
Subject to CCF:	Yes	Date Endorsed:	2/04/2020
Code Status:	Active	Next Review Date:	2/06/2025
Number of Signatories:	8	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Chorus	Auckland	Yes	Current
Enable Networks	Christchurch	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current
Northpower Fibre	Whangarei	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Tuatahi First Fibre	Hamilton	Yes	Current

Code Name:	IMEI Block Listing Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	15/09/2023
Subject to CCF:	Yes	Date Endorsed:	15/06/2023
Code Status:	Active	Next Review Date:	15/06/2025
Number of Signatories:	3	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

Code Name:	International Mobile Roaming Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	30/07/2023
Subject to CCF:	Yes	Date Endorsed:	30/04/2023
Code Status:	Active	Next Review Date:	30/04/2025
Number of Signatories:	4	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current
Mercury NZ Limited	Auckland	Yes	Current

Code Name:	Mobile Messaging Services Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	18/11/2021
Subject to CCF:	Yes	Date Endorsed:	18/11/2021
Code Status:	Active	Next Review Date:	18/11/2023
Number of Signatories:	8	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Bulletin.Net	Auckland	No	Current
Connexus Interactive		No	Current
Modica Group		No	Current
One New Zealand	Auckland	Yes	Current
Sinch		No	Current
Soprano Design		No	Current
Spark	Wellington	Yes	Current

Code Name:	Product Stewardship Scheme
Report Year:	2025

Code Type:	Voluntary	Date Effective:	8/07/2016
Subject to CCF:	Yes	Date Endorsed:	8/07/2016
Code Status:	Active	Next Review Date:	8/07/2021
Number of Signatories:	3	Review Notes:	Review underway

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

Code Name:	Scam Prevention Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	10/02/2023
Subject to CCF:	Yes	Date Endorsed:	10/11/2022
Code Status:	Active	Next Review Date:	10/11/2024
Number of Signatories:	10	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Bulletin.Net	Auckland	No	Current
Compass Communications	Auckland	No	Current
Connexus Interactive		No	Current
Devoli	Auckland	Yes	Current
Modica Group		No	Current
One New Zealand	Auckland	Yes	Current
Sinch		No	Current
Spark	Wellington	Yes	Current
Symbio Networks		Yes	Current

Code Name:	Unauthorised Use of Mobile Phones in Prisons Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	7/11/2008
Subject to CCF:	No - implementa	Date Endorsed:	7/11/2008
Code Status:	Active	Next Review Date:	30/06/2021
Number of Signatories:	4	Review Notes:	

Organisation	City	Member	Signatory Status
2Degrees	Auckland	Yes	Current
Kordia Limited	Auckland	Yes	Current
One New Zealand	Auckland	Yes	Current
Spark	Wellington	Yes	Current

Code Name:	Vulnerable Consumer Code
Report Year:	2025

Code Type:	Voluntary	Date Effective:	22/11/2025
Subject to CCF:	Yes	Date Endorsed:	22/05/2025
Code Status:	Active	Next Review Date:	22/11/2027
Number of Signatories:	5	Review Notes:	

Organisation	City	Member	Signatory Status
Northpower Fibre	Whangarei	Yes	Current
Devoli	Auckland	Yes	Initial Compliance Period
Mercury NZ Limited	Auckland	Yes	Initial Compliance Period
Spark	Wellington	Yes	Initial Compliance Period
2Degrees	Auckland	Yes	Initial Compliance Period