

KIA TOIPOTO ACTION PLAN 2025-2026

CREATING A FAIRER, MORE INCLUSIVE WORKPLACE AUGUST 2025



THE FINANCIAL MARKETS AUTHORITY - TE MANA TĀTAI HOKOHOKO

This copyright work is licensed under the Creative Commons Attribution 3.0 New Zealand licence. You are free to copy, distribute and adapt the work, as long as you attribute the work to the Financial Markets Authority and abide by the licence terms. To view a copy of this licence, visit creativecommons.org

OUR COMMITMENT TO KIA TOIPOTO

KIA TOIPOTO ACTION PLAN 2025

Action Plan Summary: Delivering on Kia Toipoto (2021-24)

This Action Plan outlines our commitment to Kia Toipoto, aimed at closing gender, Māori, Pacific, and ethnic pay gaps and creating a fairer, more inclusive workplace.

Kia Toipoto supports the Crown's obligations under the Public Service Act 2020 and Government Workforce Policy Statement 2021, requiring public sector agencies to take measurable action on equity and inclusion. Building on the 2018-20 Gender Pay Gap Action Plan, Kia Toipoto broadens the focus to ethnic pay gaps and greater inclusion of wāhine Māori, Pacific women, ethnic women, disabled people, and rainbow communities.

Under Kia Toipoto, we are required to:

- · publish pay gaps in pay gap action plans each year
- ensure bias does not influence starting salaries or pay for employees in the same or similar roles
- have plans to improve gender and ethnic representation in our workforce and leadership
- · develop equitable career pathways and opportunities to progress
- protect against bias and discrimination in HR and remuneration policies and practices
- build cultural competence
- normalise flexible working

The three goals of Kia Toipoto are:

- Making substantial progress towards closing gender, Māori, Pacific, and ethnic pay gaps.
- Accelerating progress for wahine Maori, Pacific women, and women from ethnic communities.
- Creating fairer workplaces for all, including disabled people and members of rainbow communities.

By implementing Kia Toipoto, we're building a workplace where everyone is valued, supported, and fairly rewarded - essential to delivering for the communities we serve.

Metrics in this report are as at 1 July 2025.

EXECUTIVE SUMMARY

KIA TOIPOTO ACTION PLAN 2025

Pay Gaps at a Glance

- Gender pay gap (incl. Chief Executive): 0.59% (down by 9.41% since March 2023).
- Ethnic pay gap: 10.20%

What We've Achieved Since Last Year

- Progress towards achieving gender balance across our junior roles with a slight decrease in the proportion of women.
- Began collecting demographic data, with a 24% disclosure rate for ethnicity to date.
- Increased representation of women in senior leadership roles from 53% to 56%.

Our Commitments for 2025-26

- Work with kaimahi to identify barriers to disclosing demographic information and increase awareness
 of its purpose by June 2026.
- Introduce mandatory unconscious bias training for hiring managers to help eliminate bias in recruitment by June 2026.

OUR VALUES AND KIA TOIPOTO

We are committed to being a diverse, inclusive, and equitable workplace where all kaimahi are valued. Reducing pay gaps and advancing equity is a continuous journey, guided by our commitment to Kia Toipoto and broader DEI goals.

Our values - Manawa Tahi, Manawa Rangi, Manawa Nui, and Manawa Ora - shape how we work together and support fair, inclusive practices. By embedding these values into daily work, we strengthen our ability to close pay gaps and build a workplace where all kaimahi can thrive (see appendix 1 for more information on our values).









GENDER DEMOGRAPHICS AND REPRESENTATION

HOW OUR WORKFORCE IS COMPRISED

Key Insights

- Women are well represented across all bands, particularly in junior to mid-level roles.
- Women are in the majority of part-time roles, comprising 72%, while men represent just 28%.
- 53.4% of leaders are women, with 67% of the Executive Leadership Team (ELT) being women.
- Women representation is highest in Band 3 (75%) and Band 4 (77%), while men representation peaks in Band 6 (48%) and Band 9 (100%).

Total Staff



Gender Representation across the FMA

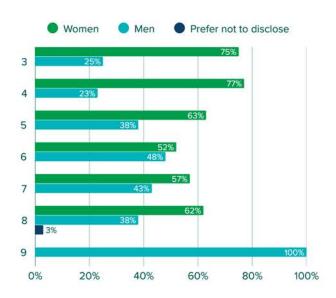




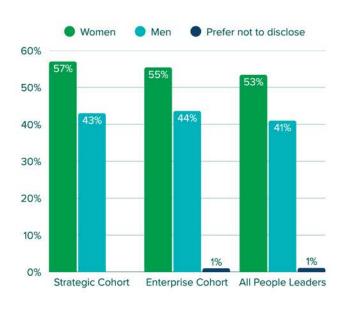
Gender Representation of Executive Team



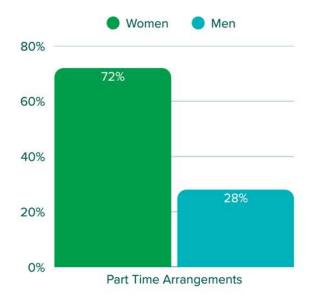
Gender Representation by Salary Band*



People Leader Gender Representation



Part Time Work Arrangements by Gender



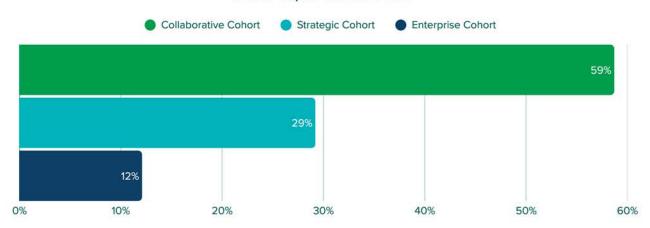
GENDER DEMOGRAPHICS AND REPRESENTATION

HOW OUR WORKFORCE IS COMPRISED

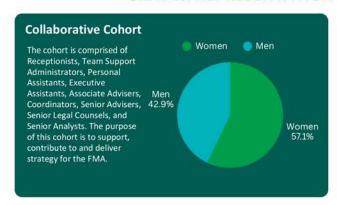
Key Insights

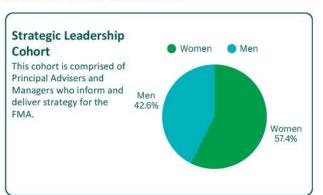
- Consistent gender split across the Collaborative, Strategic and Enterprise cohorts*, with women representation between 56.4% and 57.4%, reflecting stable gender equity across cohort levels.
- Women represent a consistent majority across all cohorts.

Cohort Split across FMA

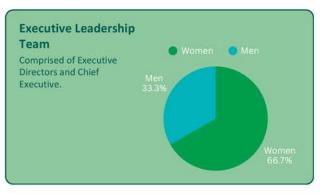


GENDER REPRESENTATION ACROSS OUR COHORTS









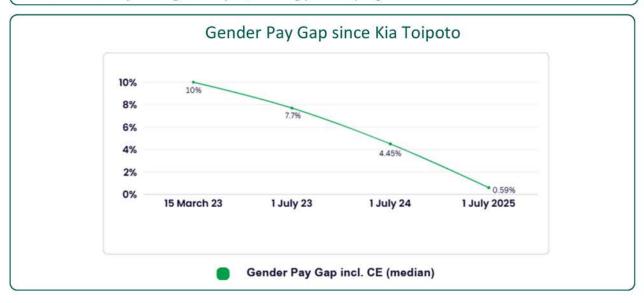
^{*}See appendix 3 for further information on our cohorts

GENDER PAY GAP ANALYSIS

GENDER PAY GAP CONTINUES TO DECREASE SIGNIFICANTLY

Key Insights

- Our gender pay gap* has reduced from 10% in March 2023 to 0.59% in July 2025. This is significantly lower than the New Zealand Public Service average of 6.1% (as at 30 June 2024)
- Women are concentrated in lower bands (3-5), which drives much of the remaining gap.
- Bands 7-8 show small gaps in favour of men, despite higher women representation.
- Band 6 has improved gender split, showing positive progress.



Pay Equity by Salary Band

At the pay equity level, equal pay for roles of equal size, we are performing well. Our analysis shows:

- Bands 3 and 4: Median pay gap in favour of women, primarily due to the higher number of women in these roles. These bands include a variety of positions such as administrators, graduates, associates, and coordinators. Due to the variety of roles, achieving precise pay parity within these bands is complex.
- Band 5: A slight pay gap in favour of women, again reflecting a higher proportion of women employees.
- Band 6: The gender pay gap is very minor, indicating strong pay equity and a wellbalanced gender split.
- Band 7: A minor median pay gap in favour of men, though gender distribution in this band is balanced.
- Band 8: A minor median pay gap in favour of men, despite a higher proportion of women in this band.

Key Drivers of our Pay Gap

- A key driver of our current gender pay gap is vertical gender representation, with a higher proportion of women in Bands 3 to 5, which are generally lower-paid roles.
- While this highlights strong women representation overall, concentration in lower bands affects pay gap outcomes.

Our Commitments

To support ongoing progress toward gender pay parity, we are committed to:

- Ensuring balanced gender representation across all stages of recruitment
- Maintaining a focus on equitable gender distribution across all pay bands

^{*}See appendix 4 for further information on our the data used to calculate our pay gap.

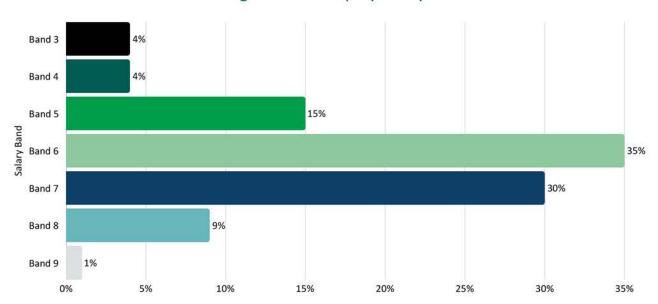
DETAILED GENDER PAY GAP METRICS

GENDER PAY GAP CONTINUES TO DECREASE SIGNIFICANTLY

Key Insights

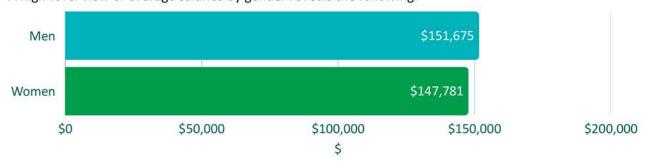
- Median pay gap: 0.59%, down from 10% in 2023. This indicates strong gender pay equity at the midpoint of our pay distribution.
- Mean pay gap: 2.57%, showing men on average are in higher-paid roles.
- Average pay: Men earn about \$3,894 more per year than women (\$151,675 vs \$147,781).

Percentage of FMA Employees by Band



Average Salary Comparisons

A high-level view of average salaries by gender reveals the following:



While this gap is not large, it does highlight the need to continue monitoring our gender pay equity.

Pay Gap by Band

The median pay gap in Band 6 is -0.56% (in favour of women) and Band 7 is 1.50% (in favour of men).

To protect people's privacy, we can only report band-level pay gaps where there are at least 20 staff. That means we can currently only show results for Bands 6 and 7.

ETHNICITY DATA & PAY GAP ANALYSIS

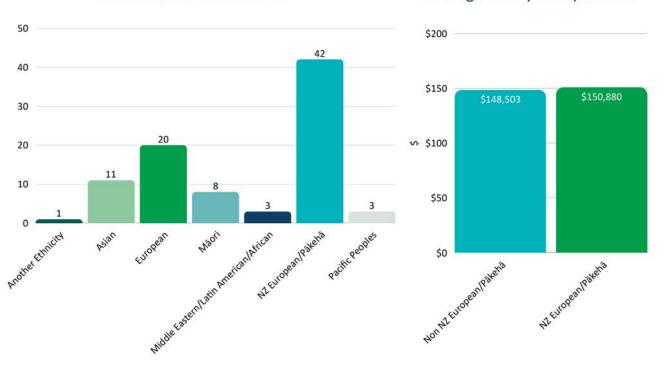
PROGRESS MADE IN UNDERSTANDING OUR ETHNIC PAY GAP

Key insights:

- Median ethnic pay gap is 10.20% (in favour of NZ European/Pākehā), mean pay gap is 1.52%.
- · Ethnicity data is limited by a 24% self-disclosure rate
- Next steps include partnering with kaimahi to understand disclosure barriers and promoting awareness of demographic data benefits.

Self-Disclosed Ethnicities*

Average Salary Comparisons



Key Drivers of our Pay Gap

Our current ethnicity self-disclosure rate is 24%, which means the available data may not fully represent the diversity of our wider organisation.

As a result, any analysis of the ethnic pay gap should be interpreted with caution. While the small differences in average salaries suggest relatively low variation across ethnic groups, the limited disclosure rate affects the reliability and accuracy of these findings.

Our Commitments

We are committed to improving the quality and completeness of our demographic data. To support this, we plan to:

- Partner with kaimahi to understand barriers to self-disclosure
- Promote awareness of the purpose and benefits of collecting demographic data

Next Steps

- Promote awareness of the purpose and benefits of collecting demographic data.
- Target lifting disclosure from 24% to at least 50% by 2026.

^{*}Please note that staff have the option to identify as more than one ethnicity. Where staff have identified with more than one ethnicity, they are represented in each group for the purposes of calculating the pay gap.

MEANINGFUL PROGRESS MADE, WITH MORE TO DO

OVER THE PAST YEAR WE HAVE TAKEN IMPORTANT STEPS TO CLOSE PAY GAPS, STRENGTHEN INCLUSION, AND SUPPORT THE WELLBEING OF OUR PEOPLE.

Key Insights

- Te Pātaka Haurongo, our newly implemented HRIS, enables demographic data collection.
- Established a DEI Champions Network to embed employee voice in shaping initiatives.
- Expanded support for kaimahi through Living Wage commitment, wellness spaces, wellbeing framework, and insurance benefits.
- Ongoing challenge: **increasing self-disclosure** of ethnicity, gender and disability data (currently 24%).

Embedding Equity and Inclusion

- Addressed gender pay gaps through a continued collaborative approach to setting new starters salaries.
- Implemented Te Pātaka Haurongo to track diversity data.
- · Committed to Living Wage or above for all kaimahi.

Supporting Wellbeing

- Launched Te Puna Wai Tapu wellness room

 a quiet, lockable wellness space for prayer, breastfeeding, and those with sensory or health needs Wellington version coming soon (see appendix 5 for further details).
- Adopted Te Whare Tapa Whā as wellbeing model, with quarterly learning and engagement sessions (see appendix 6 for further details).
- Continued free Life & Health Insurance for permanent kaimahi.

Strengthening DEI Culture

- Established DEI Champions Network across FMA to provide insights and lead engagement.
- Celebrated key events including International Women's Day, Pride Month, and Mental Health Awareness Week.

While these initiatives show real progress, our focus in the year ahead is to deepen employee engagement, improve the quality of our demographic data, and continue to close gaps where inequities remain.

2025-26 ACTION PLAN: BUILDING ON PROGRESS, FOCUSED ON RESULTS

OUR ACTION PLAN AT A GLANCE

Our Kia Toipoto action plan sets out clear priorities for the next 12 months across six focus areas. These actions build on progress already made and target the areas where equity gaps remain.

Focus Area	Progress to date	Next steps
Te Pono Transparency	 24% ethnicity disclosure rate Published Action Plan Refined DEI approach 	 Lift disclosure to 50% by 2026 Trial publishing salary ranges
Ngā Hua Tōkeke mō te Utu Equitable pay outcomes	 Living Wage minimum introduced Demographic data collected Gender parity lens to remuneration and promotion 	Strengthen manager bias training
Te Whakawhanaketangai te Aramahi Effective career and leadership development	 Graduate mentorship programme TupuToa support Cultural competency training 	 Embed new performance framework Expand DEI lens in succession and talent mapping
Te whai kanohi i ngā taumata katoa Leadership and representation	 Data collected on workforce representation Mandatory DEI interview question 	 Monthly reporting on diversity metrics Embed Matangirua
Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki Eliminating all forms of bias and discrimination	 Aligned our psychometric testing to our competency framework Reviewed policies to remove bias 	 Review bias training Launch internal mobility programme Review recruitment questions
Te Taunoa o te Mahi Pīngore Flexible Work by default	Streamlined application process for requesting flexible work arrangements.	Continue promoting, and supporting kaimahi.

2025-26 ACTION PLAN: BUILDING ON PROGRESS, FOCUSED ON **RESULTS**

ACTION PLAN FOR NEXT 12MONTHS

Focus Area and Milestone	Progress to date and Planned Actions	
Te Pono Transparency Milestone: Entities publish annual action plans based on gender and ethnicity data and union/employee feedback. Kia Toipoto commitments: Māori participate in action and monitoring. Entities will include data and action to achieve equitable outcomes for Māori in action plans.	 Progress to date: Published Kia Toipoto action plan. Built internal capability and understanding of our remuneration framework. Engaged with staff to further shape and refine our DEI approach. Achieved a 24% ethnicity disclosure rate Planned actions by June 2026: Publish annual Kia Toipoto action plan (ongoing) Trial publishing salary ranges on job adverts Explore combining Kia Toipoto and DEI plan (in progress) Continue running annual education sessions on remuneration framework for people leaders and all staff (on going) Partner with kaimahi to understand the barriers to disclosing demographic data and explore how we can encourage and uplift understanding on the purpose of collecting information. 	
Ngā Hua Tōkeke mō te Utu	Progress to date: Launched a HRIS system, enabling the collection of additional demographic data. Set a Living Wage minimum for all staff. Promoted the full range of employee benefits available to	

Equitable pay outcomes

Milestones: by end of 2022, entities ensure that starting salaries and salaries for the same or similar roles are not influenced by bias.

- kaimahi and their whanau
- Applied a gender parity lens in annual remuneration reviews and biannual promotions, making adjustments to ensure equity.

Planned actions by June 2026:

- Use HRIS data to inform pay gap analysis (in progress)
- Apply gender parity lens to remuneration and promotion processes (ongoing)
- Deliver hiring manager training, including unconscious bias (in progress)
- Promote employee and whānau benefits, including EAP and Rongoā (ongoing)

2025-26 ACTION PLAN: BUILDING ON PROGRESS, FOCUSED ON RESULTS

ACTION PLAN FOR NEXT 12MONTHS

Focus Area and Milestone

Progress to date and Planned Actions

Te Whakawhanaketangai te Aramahi | Effective career and leadership development

Milestone: Milestone: by end of 2022, agencies/ entities have plans and targets to improve gender and ethnic representation in their leadership.

Kia Toipoto commitments:

Māori will have career paths that empower them to achieve their career aspirations. Māori will be influential at all levels of the workplace.

Progress to date:

- · Launched trial of TupuToa leadership programme.
- · Supported AUT's Shadow a Leader programme.
- Introduced graduate mentorship programme for early-career kaimahi.
- Required cultural competency training for TupuToa leaders and mentors.
- Enhanced performance framework to embed a consistent, values-aligned approach to performance.

Planned actions by June 2026:

- Apply a DEI lens to talent, development, and succession planning.
- Explore leave options to support employees undergoing transition (in progress).
- Continue supporting TupuToa intern and leadership programmes (ongoing).

Te whai kanohi i ngā taumata katoa | Leadership and representation

Milestone: by end of 2022, agencies/ entities have plans and targets to improve gender and ethnic representation in their leadership.

Kia Toipoto commitments:

Māori will have career paths that empower them to achieve their career aspirations. Māori will be influential at all levels of the workplace.

To use data and insights to build a clear and accurate picture of our workforce and guide meaningful progress towards greater equity and representation.

Progress to date:

- Launched HRIS to collect expanded demographic data, improving workforce representation tracking.
- Added a mandatory DEI-focused interview question for all 'Head of' level and above roles.

Planned actions by June 2026:

- · Increase demographic data disclosure to improve reporting.
- Begin monthly diversity reporting (gender and ethnicity) to leadership.
- Continue to embed Matangirua, our te ao Māori strategy, which aims help the FMA apply a critical lens to the finance system as it is experienced by Māori consumers and providers, and to use our position to promote and advocate for fairness.

2025-26 ACTION PLAN: BUILDING ON PROGRESS, FOCUSED ON RESULTS

ACTION PLAN FOR NEXT 12MONTHS

Focus Area and Milestone	Progress to date and Planned Actions	
Te whakakore i te katoa o ngā momo whakatoihara, haukume anō hoki Eliminating all forms of bias and discrimination Milestone: By the end of 2023 entities have remuneration and HR systems, policies and practices designed to remove all forms of bias and discrimination.	Progress to date: Reviewed policies to remove bias and discrimination. Aligned psychometric testing with our competency framework to support unbiased decisions. Planned actions by June 2026: Review unconscious bias training (in progress). Review recruitment demographic questions (in progress). Develop internal mobility programme (in progress).	
Te Taunoa o te Mahi Pingore Flexible Work by default Milestone: By the end of 2024 agencies and entities offer equitable access to flexible-by- default working and ensure it does not undermine career progression or pay.	 Progress to date: Well established and integrated flexible working policy applicable to all staff. Streamlined application process for requesting flexible work arrangements. Planned actions by June 2026: Continue promoting, and supporting kaimahi. 	

APPENDIX

APPENDIX 1: OUR VALUES

Ensuring all our kaimahi live our values as intended and use them to drive positive workplace behaviour helps us to deliver on our diversity, equity, and inclusion goals and implement our Kia Toipoto action plan.

Manawa Rangi - look to the horizon

We are future focused and proactive in our approach to diversity, equity and inclusion and managing pay gaps. Manawa rangi acknowledges that this is a continuous journey without a defined conclusion, we will remain open to the new ways we can improve and ensure equity for all. Committing to annual reporting and action planning that involves reflection on our progress means that our approach is purposeful and aligned to future organisational needs.

Manawa Ora - open hearts, open minds

At the heart of this value lies a commitment to understanding and being our full selves while acknowledging, empowering, and respecting others, honouring their mana. We encourage our kaimahi to demonstrate self-awareness, empathy, and humility which allows them to accept and celebrate differences. Manawa ora is central to ensuring our kaimahi accept and celebrate diversity and continue to strive to create belonging for all.

Manawa Tahi - help the team work

Embracing the unique perspectives and experience of every individual allows us to ensure all voices are heard and contribute to our organisational experience and journey. We ask our leaders and kaimahi to role model vulnerability to actively build psychological safety and trust. Manawa tahi creates an environment where collaboration is encouraged, and our kaimahi are open to learning from each other.

Manawa Nui - make the calls

This value empowers all our kaimahi to act and speak up for what is right, fair, and just, and have the courage and confidence to act with initiative. We develop our organisational knowledge through curiosity, testing assumptions, and data-informed insights. This process is applied to our diversity, equity, and inclusion work, ensuring our progress is employee-led and relevant. Manawa nui ensures we remain genuine in our commitment and dedication to delivering these important initiatives.

APPENDIX 2: SALARY BANDS

The FMA operates a structured banding system, comprised of seven bands in total (Bands 3 to 9), grouped into three career levels: Team Member, Specialist, and Advanced Specialist/Team Manager.

APPENDIX 3: COHORTS

The FMA is structured with cohorts, the purpose of these cohorts is to create a less hierarchical approach to how we define roles within the FMA and to encourage collaboration across all levels.

APPENDIX 4: PAY GAP

To calculate our pay gap, we have used base hourly rate pay for all permanent, fixed term and casual employees.

APPENDIX

APPENDIX 5: TE PUNA WAI TAPU - THE WELLNESS ROOM

We have launched a Wellness room, named 'Te Puna Wai Tapu' in our Auckland office as a multi-use wellness space for prayer, breastfeeding/pumping and as a quiet space for people with additional sensory or health needs. This offering aligns with our te ao Māori Strategy, embodying Maanaki, the essence of nurturing and caring for others and recognises the challenges that face parents, particularly Mothers in returning to work after parental leave and aims to help break some of these barriers down.

Te Puna Wai Tapu is a quiet, lockable space with comfortable seating, a fridge for the storage of breast milk and sensory friendly lighting to make the room a versatile space. We will have a similar space in our Wellington office following our office move later this year.

Te Puna Wai Tapu means "The Sacred Spring" likening the space to the sacred springs Māori would go to cleanse and reset

APPENDIX 6: TE WHARE TAPA WHĀ

As part of our ongoing commitment to support wellbeing at work and beyond, this year as part of our wellbeing offerings we have chosen Te Whare Tapa Whā as our wellbeing model for FY25/26.

Each Quarter we will provide learning sessions and a quarterly engagement challenge for our kaimaihi. Our Pou Ahurea hosted an introduction session to Te Whare Tapa Whā in July which was well attended and recieved by our kaimahi.