

A photograph of a woman with short, grey hair, wearing a light-colored blazer, looking down at a tablet device. The image is partially obscured by a dark blue diagonal overlay that contains the text.

The Convergence of Social & Governance: New Zealand's Modern Slavery Legislation Accelerates Certification & Compliance Requirements

We know you're busy. So, we've put together this Cheat Sheet which summarises the key details of our in-depth whitepaper, *The Convergence of Social & Governance: New Zealand's Modern Slavery Legislation Accelerates Certification & Compliance Requirements*.

In the current climate, geopolitical instability is the primary perceived disruption to global economic growth, while the focus on energy prices has also increased.¹ These global forces are met by changes closer to home, such as New Zealand's long awaited Modern Slavery Bill.

There are implications for New Zealand businesses of all sizes. For example, if your business is not directly impacted by New Zealand's modern slavery legislation, it's likely that your customers will be required to meet their obligations under the bill. As a result, your customers will require you to disclose information regarding your own supply chain. To retain your seat at the table, start by understanding your own level of risk by association and ESG obligations.

REFERENCE

[1] McKinsey & Company. (2026). *Economic conditions outlook, March 2026*, 27 March. Retrieved from: https://www.mckinsey.com/capabilities/strategy-and-corporate-finance/our-insights/economic-conditions-outlook?utm_source=chatgpt.com

Responsible Sourcing

Responsible sourcing is when a business actively sources products and services for their operations in an ethical, environmentally sustainable and socially conscious way.²

The complexity of supply chain networks makes it challenging for businesses to manage every stage and to retain transparency end to end. A McKinsey report found that companies with greater supply chain transparency and agility are twice as likely to avoid major supply disruptions compared to those with limited visibility.³

When these factors are considered in conjunction with surety of supply challenges and a volatile geopolitical landscape, partnering only with suppliers who can afford the degree of protection your business requires via certification and compliance becomes paramount. For businesses needing to manage surety of supply with long term compliance, it's critical to only partner with suppliers who hold the highest level of certification in market.

REFERENCE

[2] Sedex. (2026). *What is responsible sourcing?*, 7 January. Retrieved from: <https://www.sedex.com/blog/what-is-responsible-sourcing/> [3] Inspectorio. (2025). *Traceability in 2025: Evolving from compliance to strategic advantage*. Retrieved from: <https://www.inspectorio.com/blog/traceability-in-2025-evolving-from-compliance-to-strategic-advantage> [4] PwC New Zealand. (2021). *Modern slavery: What Aotearoa New Zealand organisations need to know*, May. Retrieved from: <https://www.pwc.co.nz/assets/2022-assets/insights-and-publications/modern-slavery-what-aotearoa-nz-organisations-need-to-know.pdf> [5] Simpson Grierson. (2026). *The Modern Slavery Bill — here's what you need to know*. Retrieved from: https://www.simpsongrierson.com/insights-news/legal-updates/the-modern-slavery-bill-here-s-what-you-need-to-know#_ftn1 [6] New Zealand Parliament. (2026). *Modern Slavery Bill, Members' Bill 242—1*, introduced 10 February. Retrieved from: <https://www.legislation.govt.nz/bill/members/2026/242/en/latest/#LMS1569498>

Modern Slavery: A Key Risk Under the Social Pillar of ESG

As signalled in our first whitepaper, *The Rise of ESG & Its Impact on Business Decisions*, modern slavery at any point in the supply chain poses a significant risk to New Zealand businesses of all sizes. This risk is now intensified due to the potential legal and financial ramifications facing New Zealand businesses who do not comply with the legislation.

Modern slavery is defined by several international standards and represents the extreme end of a spectrum of labour exploitation. It is an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking.⁴

In March 2022, Joseph Matamata was convicted of 13 charges of slavery and 10 charges of human trafficking for offending committed between 1994 and 2019. When announcing the introduction of the bill, MP Greg Flemming said:

“had the framework that we’re introducing in this legislation...been in place, that case would have been identified and dealt with years earlier and saved hundreds of victims.”⁵

Understanding New Zealand’s Modern Slavery Legislation

New Zealand businesses previously haven’t been required to have supply chain transparency or comply with modern slavery reporting frameworks, but many key trading partners have in countries such as Australia, the United Kingdom and United States. The introduction of legislation will bring modern slavery reporting frameworks in New Zealand in line with these countries.

What the Bill Includes

- Mandatory public reporting for businesses with annual revenue above NZ\$100 million
- Obligations focused on transparency and responsible supply chain management, including reporting on the number of complaints made, whether any modern slavery incidents have occurred and measures to address them
- Offences, pecuniary penalties and a director’s liability framework for business non-compliance.

The bill represents both responsibility and opportunity. Reporting businesses will be required to map supply chains, strengthen their procurement processes and publish clear disclosures.

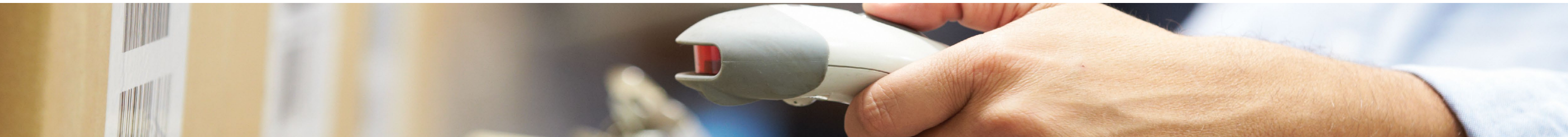
The Potential Impacts of Modern Slavery Legislation in New Zealand

Businesses operating in New Zealand with a consolidated annual revenue of NZ\$100 million will be deemed a reporting business. This includes companies, state-owned enterprises and both public and private sector businesses.

Businesses that commit an offence may be criminally liable for a fine of up to \$200,000. The bill imposes personal liability for directors and senior managers.

Businesses who do not meet the mandatory reporting requirements of NZ\$100 million in revenue will likely indirectly be impacted by the introduction of the bill. You should think about your customer base where they may exceed this revenue threshold as they will require you to provide your own supply chain data which demonstrates compliance to meet their own obligations under this bill.

For more information on the bill, see footnote 6.



The Connection Between Social & Governance

The introduction of modern slavery legislation to New Zealand reflects this shift in the context of geopolitical uncertainty. Businesses of all sizes are expecting compliance, transparency and surety of supply. These expectations are best met by partnering with businesses who hold the highest level of certification available in market.

As an FSSC 22000 accredited partner, we help our customers to manage their risk by association by providing surety of supply. We do so through our highly qualified, in-house Procurement experts who source products from across New Zealand, China, Malaysia, South Korea and more. We are continually working closely with our long-standing supply partners to give ongoing certainty and maintain active contingency around the products we source which our customers require for their business continuity.

For access to our Auckland record, see footnote 7.

For access to our Christchurch record, see footnote 8.

The Snell Advantage

As New Zealand businesses come under increasing scrutiny based on who they choose to partner with and their progress towards their Environmental, Social and Governance (ESG) obligations, Snell is committed to partnering with businesses whose values align with our own.

Our ability to serve some of New Zealand's largest manufacturing, agricultural and food processing companies is underpinned by our unique approach. To learn more about The Snell Advantage and access to additional insights, [visit our website](#).

To learn more about the topics discussed in this cheat sheet, download the associated whitepaper [via our website](#).

REFERENCE

[7] Foundation FSSC. *Public Register: FSSC Certified Organizations*. Retrieved from: <https://www.fssc.com/public-register/NZL-1-0262-971260/> [8] Foundation FSSC. *Public Register: FSSC Certified Organizations*. Retrieved from: <https://www.fssc.com/public-register/NZL-1-0262-741728/>

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