



NZPost
Tukurau Aotearoa

Modern Slavery Statement

Financial year ended
30 June 2024

1. Purpose of this Statement and Reporting Entity

\$1.147 billion

Revenue

\$326.4 million

Procurement spend

4,638

Employees*

1,398

Delivery contractors

366

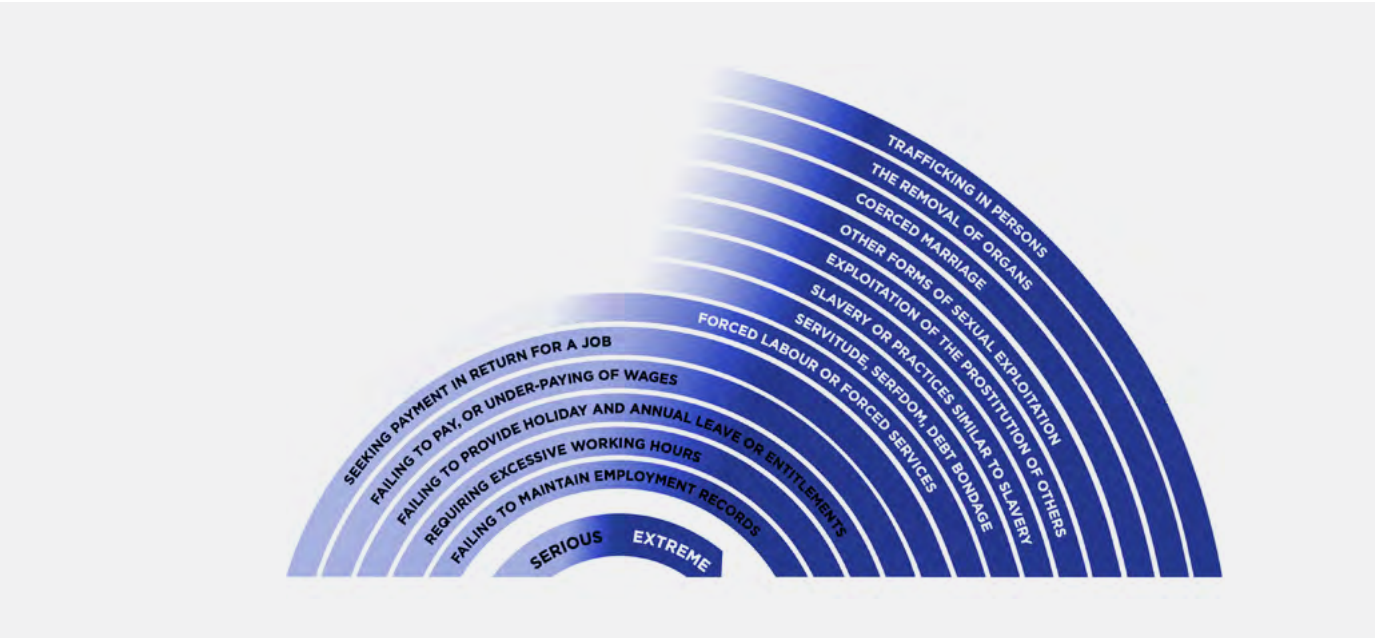
Significant Vendors

Purpose

Our 2023-2024 modern slavery statement sets out the steps we have taken to manage the risk of modern slavery within our operations and supply chains. It also describes how we assess the effectiveness of our actions.

This statement has been prepared by New Zealand Post Limited (NZ Post) for the reporting year ended 30 June 2024 and applies to the wholly owned operating subsidiaries of New Zealand Post Limited, including its extended workforce. For the purpose of this statement NZ Post refers to NZ Post and its wholly owned subsidiaries.

Continuum of exploitation



Modern Slavery

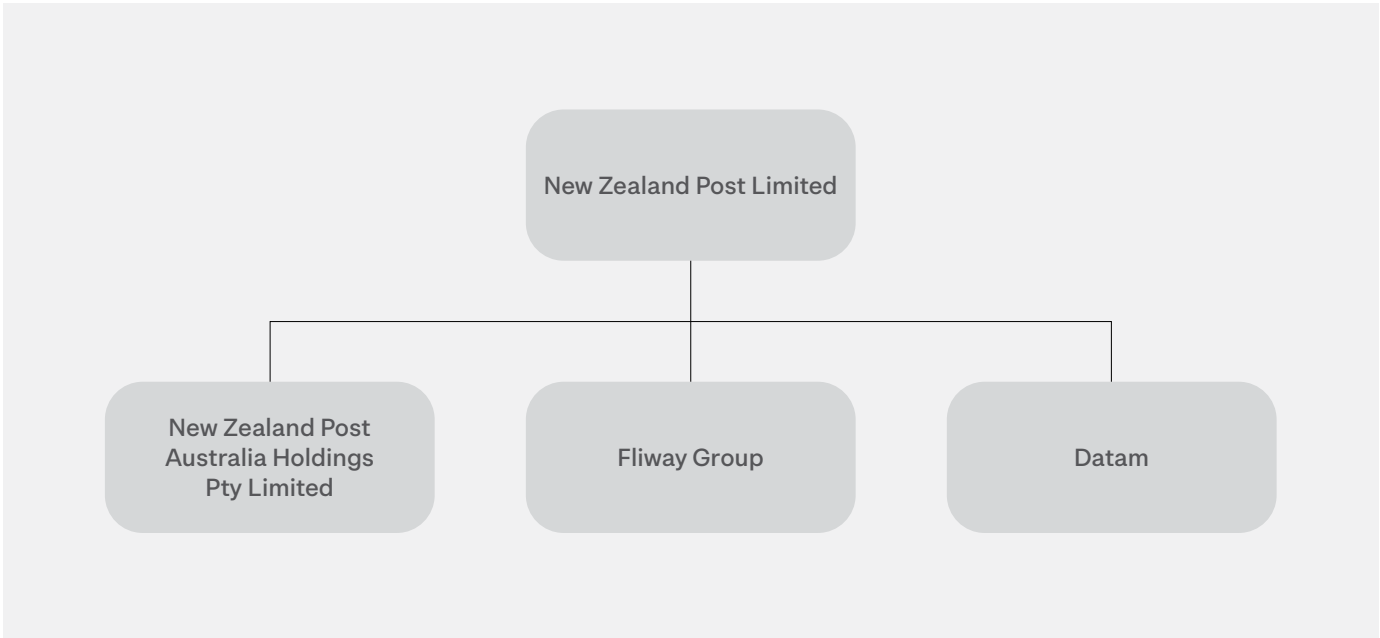
The Australian Modern Slavery Act 2018 (Cth) defines modern slavery as “situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. Practices that constitute modern slavery include human trafficking, slavery, forced labour, debt bondage, forced marriage and the worst forms of child labour.”

The New Zealand Ministry of Business Innovation and Employment (MBIE) has stated that Modern slavery occurs on a 'continuum of exploitation'. Labour related exploitation includes a variety of practices that range from serious to extreme. Modern slavery focuses on exploitation at the extreme end of the spectrum. However, by putting in controls to mitigate the risk of modern slavery, other forms of labour exploitation may also be addressed.

A range of practices referenced in the diagram above are criminalised in New Zealand's legislation, including the *Immigration Act 2009*, *Crimes Act 1961* and *Worker Protection (Migrant and Other Employees) Act 2023*. [MBIE 'Continuum of Exploitation'](#)

*4,638 is our number of people, not full time employees, and includes Fliway.

2. Description of our Structure, Operations, and Supply Chains



For the purposes of this modern slavery statement, the reporting entity is New Zealand Post Limited (NZ Post). NZ Post is primarily a logistics and delivery business operating across New Zealand, Australia and internationally. In this section we provide a description of our entity structure, operations, and supply chains.

NZ Post is a company incorporated in New Zealand under the Companies Act 1993, and a State-Owned Enterprise (SOE) under the State-Owned Enterprises Act 1986, which means that it is required to be as profitable and efficient as comparable businesses that are not owned by the Crown, a good employer and to exhibit a sense of social responsibility.

As an SOE, NZ Post is responsible to its shareholding Ministers (Minister of Finance and Minister for State-Owned Enterprises). The Minister for Media and Communications is the Minister responsible for postal services.

Overview of our Entity Structure

- **New Zealand Post Limited:** is a registered company in the New Zealand Companies Office NZBN 9429039700766, and is a State-Owned Enterprise.
- As at the date of this Modern Slavery Statement, there are 4,638 employees that work for NZ Post (including permanent, fixed term, casual and on-call). NZ Post services are also delivered by 1,398 delivery contractors.
- NZ Post operates across the whole of New Zealand and has operations overseas (as detailed below).
- **New Zealand Post Australia Holdings PTY Limited:** located in New South Wales. New Zealand Post Australia Holdings PTY Limited (NZPAH) (ABN: 97 086 383 904) has a team of full-time employees who are located at the NSW office. NZPAH is responsible for developing, implementing, and championing New Zealand Post’s inbound and offshore customer service offerings. This encompasses the matrix of managing wholesale, direct entry, direct marketing, courier, freight and Universal Postal Union (UPU), coordination and market-flow
- **Datam Limited:** Registered in New Zealand (NZBN: 942 9039585677), employs some of the staff who work in NZ Post’s integrated customer communications solutions business, which is NZ Post trading as Datam.
- **Fliway Group Limited:** In March 2022 NZ Post acquired Fliway, a company specialising in large item delivery. Fliway is a registered New Zealand Limited company 1870504.

Our People

Courier

We offer a tiered range of courier solutions – Courier and Express - through our networks, depending on the speed and the customer experience required. We engage small businesses and independent contractors using their own vans to provide Courier and Express delivery services to our customers. ‘Economy’ is our standard parcel delivery service for consumers that is delivered through the postal and courier network.

Mail

Mail has been the historical backbone of the NZ Post business, dating back to the 1840s. This includes residential “postie” delivery, rural delivery and connections with international postal operators. Delivery mode in higher density urban areas is primarily mid-range electric delivery vehicles, complemented by some walking, cycling and motorbike runs, while in rural areas vans are the primary delivery mode. NZ Post engages independent contractors to provide rural delivery services. NZ Post is New Zealand’s designated Universal Postal Union (UPU) postal operator which means it accepts and delivers mail sent from other overseas UPU members.

Transport

Our Transport team is responsible for the national road and air bulk transport operations that connect all major towns and cities throughout New Zealand; many of these functions are provided by outsourced partners providing services under contract. A core team of employees work alongside aviation suppliers, road transport contractors, and third-party support partners, to coordinate and manage the Transport functions.

Supply Chain Solutions

Supply Chain Solutions is NZ Post’s third-party logistics provider. Supply Chain Solutions supply warehousing, order and fulfilment services to NZ Post.

Datam

Datam is NZ Post’s print and mail house which provides services to a range of business customers.

Fliway

Fliway provides transport, warehousing and international freight services and operates New Zealand’s premier national dedicated supply chain for large and oversize items. It is headquartered in Auckland and employs just under 500 staff.

Retail Operations

The Retail team primarily supports the agents that comprise the vast majority of NZ Post’s retail network, providing onboarding, training and operational functions to deliver services consistently nationwide. The team also operate a small number of company-operated outlets including staffing and related end-to-end management. As at 30 June 2024, NZ Post had 15 company-operated outlets and 759 agency operated (licensed) outlets.

Box Lobby Services

The supply of postal storage facilities by means of Private Bags and Post Boxes across our box lobby network.

Stamps & Coins

The supply of collectable Stamps and Coins which are sold via NZ Post’s store network and website.

Our Operations in Australia and Overseas

The NZPAH team working with our New Zealand and Singapore Teams manages our off-shore customer-base, customer returns, sales opportunities, and directs activities over inbound and offshore products. The team provides a solutions suite that reflects global markets delivery trends and delivers seamless cross-border eCommerce by facilitating end-to-end supply chain solutions for our customers.

International Freight and Warehousing

This includes our redelivery service, YouShop.

Our Supply Chains

NZ Post works with around 366 significant* vendors. When we engage with new suppliers, we require them to enter into supplier agreements. These agreements require our suppliers to adhere to the laws of New Zealand and our Supplier Code of Conduct which includes human rights and labour standards consistent with modern slavery reduction principles.

NZ Post buys products and services needed to operate its business. This includes, but is not limited to, transportation and fuel, uniforms, machinery and equipment, recruitment services, air cargo services, marketing services, IT (hardware, software and services and infrastructure), property services, and finance systems.

*Significant vendors that NZ Post works directly with over \$50,000 in value, not including delivery and transport contractors.

3. Modern slavery risks

In order to identify NZ Post’s modern slavery areas of risk we considered the following key risk indicators:



Geographic



Sectors / Industries



Products and services

We have identified the following higher risk supplier categories that will be the focus of our risk mitigation work:



Retail agencies



Cleaning, office commodities and security



Uniform suppliers



Technology and IT providers



Offshore product manufacturing



Contractors/subcontractors that provide our services



Provision of contingent / temporary labour

4. Actions taken to assess and address modern slavery risks

Actions taken to assess and address modern slavery and worker exploitation risks by NZ Post fall across several key areas:

- Our Supply chain
- Our Last Mile Delivery Contractors (Courier, Express, Rural and Provincial Delivery)
- Our general operations

Actions may be specific to one area of operation, while others may traverse the entire NZ Post operation.

We made good progress against actions in FY24 which can be seen in the table below.

Our Plan in FY24

| Planned Action | How did we do? |
|--|--|
| Continuing to monitor the legal and regulatory environment in New Zealand concerning New Zealand’s prevention of modern slavery legal framework. | ● No specific changes to legislation in FY24. |
| Establishing a Modern Slavery and Worker Exploitation working group who are responsible for the oversight of the FY24 programme of work | ● Complete. Working group is in place. |
| Formalising a modern slavery and worker exploitation framework, including documenting all identified modern slavery and worker exploitation risks and control measures. | ● While a number of controls have been identified and are in place, we will over time identify and implement further controls as part of our ongoing assessment of risk. |
| Creating new and evaluating and updating existing policies and procedures | ● Ongoing ● Updates to onboarding processes have been completed ● Modern Slavery & Worker Exploitation Policy has been finalised and published. ● Procurement processes now include Modern Slavery due diligence ● Contracts now include anti-modern slavery clauses |
| Rolling out an assessment approach for our most at-risk tier 1 suppliers to collaborate & test our existing supplier mapping | ● Linked to supply chain mapping below. |
| Continuing supply chain mapping | ● A third-party (Fair Supply) proprietary risk and reporting platform has been engaged to assess the modern slavery risk exposure of all spend items to Tier 10 of the supply chain. All procurement data uploaded before the end of the financial year. |
| Continuing to build NZ Post Board and Executive Team understanding of modern slavery, worker exploitation, and labour rights issues | ● An Independent expert led a session on Modern Slavery and Worker Exploitation for the NZ Post Board Sustainability Committee. |
| Continuing internal training in key areas of the business | ● Continued with training of key personnel. <i>Note: training will be an ongoing focus to ensure relevant personnel remain up to date with information.</i> |
| Continuing to monitor Whistleblower Integrity Line for any modern slavery or worker exploitation issues | ● On-going, there were no instances of modern slavery or worker exploitation raised via this mechanism in FY24 |
| Undertaking a review of Fliway modern slavery and worker exploitation processes | ● Not started |
| Continuing to collaborate with suppliers and other organisations on the topics of modern slavery, worker exploitation and ethical sourcing. This allows NZ Post to look for improvement opportunities within its own programme of works by learning from others. | ● On-going. NZ Post is part of the Collaborative Advantage Group and other informal working groups. |

Additional actions completed in FY24

Modern Slavery due diligence undertaken during the tender process for several key services that were renewed during FY24.

A report has been completed on the specific supplies purchased from our stationery supplier and the potential sustainability risks (including modern slavery).

We established the ability to send self-assessment questionnaires to suppliers with elevated modern slavery risk using a third-party platform as part of procurement due diligence.

We have sought external advice on appropriate engagement and corrective action with subcontractors.

We have continued to work with other New Zealand and Australian organisations, who share the same challenges, as part of a Collaborative Advantage collective. Organisations are sharing experiences, resources and materials to allow for greater awareness of modern slavery, and to help prioritise the work and resources in this area.

Our key policies

Our People

Modern Slavery & Worker Exploitation Policy

This policy sets out our commitment to effectively identify, assess, and address the risk of Modern Slavery and Worker Exploitation occurring within our own business or infiltrating our supply chains.

Integrity (and Protection of Whistleblowers) Policy

This policy and integrity hotline provides people working for NZ Post with a mechanism to whistle blow on behaviour that falls below the ethical standards expected of a person working at NZ Post, is contrary to legislation or regulation, or other serious misconduct or non-compliance.

Code of Conduct (“Post Code”)

The NZ Post Code of Conduct and Ethics ‘Our Post Code’ is for all our team and is a personal guide with tips and hints to make it easy to do the right thing at work.

Our Suppliers

Supplier Code of Conduct

The Supplier Code of Conduct sets out NZ Post’s minimum expectations that suppliers provide services with integrity and in compliance with all applicable law, regulations, and ethical standards including compliance with anti-slavery laws and practices of the country where they are doing business.

Procurement Policy and Principles

NZ Post procurement is guided by the New Zealand Government Procurement Charter and Principles of Procurement, to ensure that we get the right value-for-money outcome following fair and transparent processes while also considering social, sustainable, and environmental outcomes.

5. How NZ Post assesses the effectiveness of the actions we have taken

NZ Post has been running a cross functional working group representing key parts of the business. This group has overseen the programme of works required to ensure actions are in place to mitigate the risk of modern slavery and worker exploitation occurring through our supply chain and operational activity.

Our current assessment of effectiveness includes:

- A review of our risk assessment processes to ensure it remains up to date and no new risks have been identified that have not been recorded;
- Monitoring any trends in cases reported through the Whistleblower Integrity Line including how these cases were handled;
- Working with Collaborative Advantage – a group established by Deloitte and Kathmandu to share ideas, information, resources, and lessons learned.

6. Modern Slavery Consultation

In preparing this Modern Slavery Statement, NZ Post has consulted with NZPAH. This consultation has included NZPAH reviewing and providing comments on this Modern Slavery Statement prior to publication; and engagement through our internal working groups and teams across NZ Post.

This Statement for the financial year 2024 is published pursuant to section 14 of the Modern Slavery Act 2018. (Cth) This Statement has been approved by the Board of NZ Post on 12 December 2024.



Signed on behalf of NZ Post by
David Walsh, CEO NZ Post

