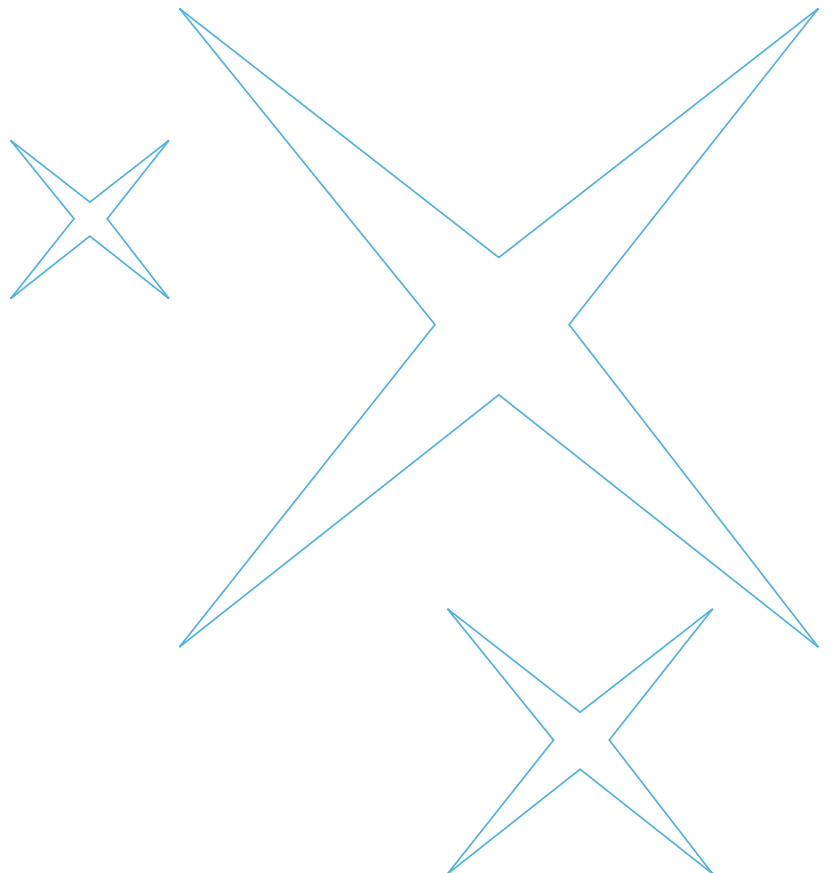


September 2025

Aotearoa New Zealand Sustainable Finance Taxonomy (NZ Taxonomy)

Minimum Social Safeguards.

Draft for public consultation – September 2025





Acknowledgements

We sincerely thank everyone who has given time and consideration to the development of the first draft of the NZ Taxonomy.

Two working groups have primarily developed this draft of the NZ Taxonomy:

1. Technical Advisory Group (TAG) – this sector-specific group has provided technical inputs to develop the Substantial Contribution criteria for the agricultural and forestry sectors, as well as the activity-specific do no significant harm (DNSH) for these sectors.
2. Technical Experts Group (TEG) – this group is overseeing the development of the entire NZ Taxonomy (all sectors) and have focused on usability, interoperability and ensuring the NZ Taxonomy delivers on its intended purpose.

TEG members

TEG co-Chairs

1. **Andy Reisinger**, Independent Climate Change Expert
2. **Pip Best**, Partner – Climate Change & Sustainability Services, EY Oceania

TEG members

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2. **Amelia Sharman**, Director – Sustainability Reporting, External Reporting Board (XRB) (from workshop #9)
3. **Caroline Poujol**, Director – Sustainable Finance (NZ), ANZ
4. **David Hall**, Policy Director, Toha Network
5. **David Woods**, Independent Sustainable Finance Expert
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8. **Greg Munford**, Senior Investment Strategist – Sustainable Investment, New Zealand Superannuation Fund
9. **James Paterson**, Head of Sustainable Finance, ASB
10. **Jeremie Madamour**, Principal Advisor – Climate Change & Sustainability Reporting, External Reporting Board (XRB) (until workshop #8)
11. **Joanna Silver**, Head of Sustainable Finance, Westpac New Zealand
12. **Jono Broome**, Associate Director – Client Advisory APAC, Morningstar Sustainability
13. **Jorge Waayman**, Manager – ESG Research, Harbour Asset Management
14. **Julia Langley**, Managing Director – Switzerland & New Zealand, Green Wave Advisory
15. **June McCabe**, Independent Director; Pou Tahua Representative, National Iwi Chairs Forum (NICF)
16. **Sean Fullan**, Resilience & Recovery Manager, Insurance Council of New Zealand (ICNZ)
17. **Stefan Gray**, Manager – Strategic Climate Initiatives, Reserve Bank of New Zealand (RBNZ)

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2. **Anita Wreford**, Professor, Lincoln University
3. **Charles Taituha**, Whenua Māori Trustee, Te Kukuwai o Kahuwera & Pukemakoiti Trust
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6. **Gavin Marshall**, Sustainability Manager, Rabobank New Zealand
7. **Glenn Moir**, Owner and Director, Forest Management Group; Chair, Canterbury West Coast Wood Council (CWCWC); Director, Forever Forests
8. **Graeme Doole**, Science Group Manager – Ethical Agriculture, AgResearch
9. **Jacqui Aimers**, Trustee, Tāne's Tree Trust; Research Analyst, Forestry Scientist and Ecologist, Aimers Consulting
10. **Jeff Illott**, Executive Director, New Zealand Timber Industry Federation (NZTIF); Chief Executive, New Zealand Timber Preservation Council
11. **Jo Horrocks**, Chief Resilience & Research Officer, Natural Hazards Commission
12. **Jonathan Procter**, Professor in Natural Hazards, Massey University
13. **Kevin Ihaka**, Managing Director, Forest Protection Services Trust, FPS Geospatial, FPS Forestry
14. **Klaeri Schelhowe**, Founder and Managing Director, Scheddebrock
15. **Lee Matheson**, Principal Consultant and Managing Director, Perrin Ag Consultants
16. **Manu Caddie**, Co-Founder and Managing Director, Matawai Bio; Founder and Managing Director, IO Ltd; Managing Director, Hikurangi Bioactives LP; Managing Trustee, Kānuka Charitable Trust
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21. **Phil Wiles**, Senior Manager – Climate Risk, Kiwibank
22. **Roger Dungan**, General Manager – Strategic Partnerships & Communication, Scion
23. **Sally Garden**, Project Director, Climate Change Commission
24. **Scott Burnett**, Regional Conservation Manager and Climate & Forestry Advocacy Lead, Forest & Bird
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27. **Terina Williams**, Senior Investment Strategist – Sustainable Investment, New Zealand Superannuation Fund
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The following experts also provided significant input into the substantial contribution criteria for climate change mitigation in perennial and non-perennial crops:

29. **Michelle Sands**, General Manager – Strategy & Policy, Horticulture New Zealand
30. **Edwin Massey**, General Manager – Sustainability, New Zealand Winegrowers

Additionally, throughout the process there has been input from and engagement with a wide range of stakeholders, including government officials, research organisations, industry bodies, real economy participants, iwi and Māori organisations, and environmental NGOs.

We also acknowledge and thank these organisations for their input to the draft criteria or for participating in group sessions and one-on-one meetings, providing general feedback or topic-specific insights and technical inputs.

To support this work, CSF engaged the **Climate Bonds Initiative** (CBI) as the technical delivery partner for the NZ Taxonomy development. The Climate Bonds Initiative is an international organisation working to mobilise global capital for climate action. CBI's mission is to help drive down the cost of capital for large-scale climate and infrastructure projects and to support governments seeking increased access to capital markets to meet climate and GHG emission reduction goals. CBI have contributed to the development of almost every sustainable finance taxonomy globally, including the EU, Singapore, Brazil and Australian taxonomies. We thank them for their expertise and guidance.

We also acknowledge Pip Band of **Band Consulting** for providing specialist technical expertise in agriculture and forestry, as well as critical input into the methodological design of the NZ Taxonomy across sectors.

The Centre for Sustainable Finance: Toitū Tahua (CSF) provides coordination and secretariat functions for the development of the NZ Taxonomy. CSF works across the financial system to align financial markets settings and initiatives with long term resilience and prosperity. It is an independently governed, charitable trust.

Ngā mihi nui.





Introduction

The Aotearoa New Zealand Sustainable Finance Taxonomy (NZ Taxonomy) is a framework to support Aotearoa's long-term prosperity and resilience. It provides decision-useful information for financial market participants who want to direct capital into environmentally sustainable activities.

The NZ Taxonomy is a voluntary framework. It defines economic activities which contribute to environmental objectives and defines the criteria those activities must meet to be considered taxonomy-aligned. By providing clear, credible and domestically relevant criteria to identify and classify environmentally sustainable activities, it enables financial market participants to more confidently identify environmentally sustainable investment opportunities, reducing risk and friction.

Taxonomies have the potential to be used as the foundation for the development of sustainability focused financial products, to help identify assets for inclusion in bonds or investment funds, to aid risk assessment or capital allocation decisions, and to support sustainability reporting. Possible use-cases continue to be developed and piloted internationally.

The NZ Taxonomy is at the stage of developing a credible, usable and internationally interoperable framework and criteria for a range of stakeholders. Work on the NZ Taxonomy in 2025 is focused on developing classifications and criteria for agriculture and forestry sector activities that contribute to the goals of climate change mitigation, adaptation and resilience.

Supporting climate transition, adaptation and resilience

The purpose of the NZ Taxonomy is to support financial market participants who wish to mobilise and direct capital flows towards:

- Building a low-emissions, Paris-aligned future;
- Restoring nature; and
- Upholding the rights and interests of Indigenous Peoples of the land.

The NZ Taxonomy has a strong focus on climate **transition activities**. Inclusion of a transition category is intended to facilitate the decarbonisation of industries which are hard-to-abate but are significant for social and economic wellbeing such as steel, cement, aviation, agriculture, etc.

Almost all taxonomies globally include transition concepts in some way, and several taxonomies utilise specific transition categories to distinguish these from green activities, including ASEAN, Australia, and Singapore.

The draft NZ Taxonomy for the agricultural and forestry sectors includes transition activities such as switching to more efficient or electric machinery, purchasing renewable energy generation and storage equipment, planting - including riparian and shelterbelt planting, improving data and monitoring efficiency, adopting new technologies and implementing new management practices. The transition classification has the intent of increasing the visibility and potential finance for credible actions which reduce emissions.

The NZ Taxonomy draft now also includes criteria designed to support **adaptation and resilience on-farm and in-forest**. As New Zealand businesses increasingly experience the impacts of climate change, the NZ Taxonomy can support businesses choosing to undertake activities which increase their adaptive capacity and build resilience.

The NZ Taxonomy is one tool that can be used to support Aotearoa New Zealand's transition to a lower emission, resilient economy. The NZ Taxonomy is not meant to determine or prescribe the future economic mix or transition pathways, but to provide support for stepping-stones on the path to a resilient future.

Why does NZ need its own taxonomy?

Taxonomies are in development in 58 global jurisdictions, and are fast becoming the common language between investors, markets and businesses when it comes to sustainability.

As a small and optional market, it is important that New Zealand meets global customer and market expectations.

To capitalise on these opportunities, it is important that the NZ Taxonomy is interoperable with established taxonomies, particularly those of key trading partners.

The NZ Taxonomy's design has benefited from an extensive review of benchmark taxonomies, including the EU, Australian and Singapore, and it is being developed with the support of global taxonomy experts.

Developing a NZ Taxonomy that is methodologically consistent with global efforts - but which includes criteria that are usable and relevant to our domestic context - ensures definitions and performance thresholds are suitable for New Zealand businesses.

NZ Taxonomy alignment

For an activity to be considered taxonomy-aligned, there are three sets of criteria to consider.

- **Substantial Contribution (SC) criteria** – The activity demonstrates it makes a substantial contribution to the environmental objective (i.e. climate change mitigation or adaptation and resilience).
- **Do No Significant Harm (DNSH) criteria** – The activity making this substantial contribution must not cause significant negative impacts on other environmental objectives.
- **Minimum Social Safeguards (MSS)** – Entities seeking NZ Taxonomy alignment should also meet minimum standards for social responsibility, including labour rights, governance and indigenous rights.

For the initial phase of NZ Taxonomy alignment, it is proposed that entities are not required to complete assessments against the DNSH and MSS framework. In future phases (date to be determined), to be considered NZ Taxonomy-aligned, activities must also meet the DNSH and MSS requirements. This obligation will apply to all reporting entities, except for small businesses – defined for this purpose as enterprises with fewer than 20 employees. Entities wanting to use the NZ Taxonomy can, of course, start including all three sets of criteria as early as they wish. Transparency about the criteria being used for assessment of alignment is recommended.

The NZ Taxonomy is a voluntary framework

It provides decision-useful information by setting clear criteria for what effective climate mitigation, adaptation and resilience activities look like.

It is at the discretion of any business owner/operator if they wish to undertake any of these activities. Likewise, it is at the discretion of any financial institution or investor if they wish to use this information in capital allocation decisions.

Governance and development

The NZ Taxonomy is being developed through a robust process established in alignment with leading international efforts in designing local taxonomies. This process includes the involvement of a diverse range of expertise, strong governance, regulatory oversight, transparency, opportunity for public input and safeguards against undue political or industry interference. The process has been as follows:

Project set-up

- Initial scoping and market validation, and a [report on design considerations for the NZ Taxonomy](#).
- Minister of Climate Change directs work to begin on the NZ Taxonomy's climate change mitigation and adaptation & resilience criteria, starting in the agriculture and forestry sectors.
- CSF convened, through an open-EOI process, a Technical Experts Group (TEG) and sector-specific Technical Advisory Group (TAG) of experts to co-design the NZ Taxonomy criteria.
- CSF engaged the Climate Bonds Initiative (CBI) as the technical partners for the development of the NZ Taxonomy. CBI has led the development of sustainable finance taxonomies globally, including in the EU, ASEAN, Brazil and Australia.
- The development work is overseen by the Ministry for the Environment, with quality assurance of the process being provided by the Council of Financial Regulators.

Criteria development

- The TEG and the Agriculture/Forestry TAG, comprising 46 members in total, worked to develop draft criteria for activities that make a substantial contribution to climate change mitigation, adaptation and resilience between December 2024 and August 2025.
- Additional technical input was sought from 35 organisations throughout this process. 22 provided substantive contributions.
- Briefings and opportunities for early input were also extended to an additional 74 organisations, including industry bodies and key players in the agriculture and forestry sectors, as well as eNGOs, financial institutions, and Māori organisations.
- The first draft of the NZ Taxonomy climate change mitigation criteria was publicly consulted on from 16 June – 13 July, 2025.
- 48 consultation responses were received by CSF, comprising 29 organisational and 19 individual submissions.
- Feedback was analysed and key issues were considered by the TEG and the Agriculture/Forestry TAG, who made revisions for this second consultation period.

About this consultation

This consultation is to seek wider stakeholder feedback on the draft adaptation and resilience criteria, as well as some key changes made to the climate change mitigation criteria.

Submissions may be made through the online [consultation form](#), or by emailing a document to taxonomy@sustainablefinance.nz. Submissions which answer the consultation questions will be prioritised.

Consultation is open from 22 September – 17 October, 2025.

Please contact taxonomy@sustainablefinance.nz for any questions or assistance.



Contents

Minimum social safeguards (MSS) framework	9
<i>MSS pillars and core topics</i>	<i>10</i>
<i>MSS criteria</i>	<i>11</i>
Corporate governance	11
Human rights	11
Iwi/Māori rights and responsibilities	11
Cultural heritage	12
<i>MSS guidance</i>	<i>13</i>



Minimum Social Safeguards framework

What are MSS criteria?

The Minimum Social Safeguards (MSS) criteria ensure that economic activities making a substantial contribution to one of the NZ Taxonomy's environmental objectives do not result in adverse social outcomes. They do so by requiring the entities undertaking these activities to meet minimum social and/or responsible business conduct standards.

Like the Do No Significant Harm (DNSH) criteria, the MSS function as a safeguard – they are not designed to deliver net-positive social outcomes, but to prevent harm. Opportunities to support positive social change may be addressed in future through the development of the Do No Significant Harm criteria for social objectives.

Why are these criteria important?

The MSS criteria help ensure that activities are not considered taxonomy-aligned if the performing entity creates negative social impacts. This ensures the NZ Taxonomy promotes truly sustainable activities that respect both environmental and social standards.

How to use this document?

For an activity to be considered taxonomy-aligned, there are three sets of criteria to consider.

- **Substantial Contribution (SC) criteria** – The activity demonstrates it makes a substantial contribution to the environmental objective (i.e. climate change mitigation or adaptation and resilience).
- **Do No Significant Harm (DNSH) criteria** – The activity making this substantial contribution must not cause significant negative impacts on other environmental objectives.
- **Minimum Social Safeguards (MSS)** – Entities seeking NZ Taxonomy alignment should also meet minimum standards for social responsibility, including labour rights, governance and indigenous rights.

For the initial phase of NZ Taxonomy alignment, it is proposed that entities are not required to complete assessments against the DNSH and MSS framework. The intent of this transitional approach is to allow entities sufficient time to adapt their reporting systems and processes to the NZ Taxonomy framework.

In future phases, to be considered NZ Taxonomy-aligned, activities must also meet the MSS requirements. This obligation will apply to all reporting entities, except for small businesses – defined for this purpose as enterprises with fewer than 20 employees.



MSS pillars and core topics

Social pillars	Core topics
Corporate governance	Good corporate governance; taxation; anti-corruption and bribery; fair competition; consumer protection; community engagement; anti money laundering.
Human rights	Employment; labour and working conditions; occupational health and safety; modern slavery; procurement practices; gender equality; non-discrimination; equal opportunity.
Iwi/Māori rights and cultural heritage	Iwi/Māori rights; cultural heritage; data sovereignty.





MSS criteria

For the initial phase of NZ Taxonomy alignment, entities are not required to complete assessments against the MSS criteria. The intent of this transitional approach is to allow entities sufficient time to adapt their reporting systems and processes to the Taxonomy framework.

In future phases, to be considered NZ Taxonomy-aligned, activities must also meet the MSS requirements. This obligation will apply to all reporting entities, except for small businesses – defined for this purpose as enterprises with fewer than 20 employees.

Regardless of whether entities complete MSS assessments, all operations must comply with relevant legislation and regulations. The NZ Taxonomy and its users are not responsible for verifying an entity's compliance with New Zealand laws and regulations. If an entity is prosecuted for a breach of such laws or regulations, its taxonomy alignment for existing or proposed activities will be void.

Corporate governance

1. The entity demonstrates a commitment to implementing high quality corporate governance, including for environmental and social matters.
2. The board and/or management is qualified and adequately structured to oversee the entity's strategy, management and performance.
3. The entity's internal controls, systems and training are sufficient to support a culture of acting ethically and in compliance with relevant laws and regulations, including those related to anti-bribery and corruption; fair competition and taxation; money laundering; and consumer protection.
4. The entity has policies and mechanisms in place to enable effective stakeholder engagement. This includes engagement with potentially affected people in relation to potential and actual impacts to iwi/Māori rights and cultural heritage, as discussed further below.
5. The entity discloses whether the entity, its board or management, including the board or management of any subsidiaries, has been convicted of corruption or bribery, breach of competition law, tax evasion, money laundering or tax avoidance.

Human rights

1. The entity has a public policy in place that outlines the entity's commitment to respect human rights in line with the expectations of the UN Guiding Principles on Business and Human Rights (UNGPs).
2. The entity has a human rights due diligence process or processes to identify, prevent, mitigate and account for how they address their actual and potential adverse human rights impacts through their operations and supply or value chains, that is appropriate to the entity's size, circumstances and operating context.
3. The entity has processes in place to enable the remediation of adverse human rights impacts in line with expectations of the UNGPs.

Iwi/Māori rights and responsibilities

1. The entity has processes in place to recognise the rights of iwi/Māori in line with Te Tiriti o Waitangi (the Treaty of Waitangi).
2. The entity has processes in place for Free, Prior and Informed Consent, in line with the UNDRIP principles and local guidance where available.
3. The entity has processes in place to uphold the rights of Māori to control data about their people, culture, and resources.

Cultural heritage

1. The entity has processes in place to identify and manage historic and cultural heritage sites.



Corporate governance

1. The entity demonstrates a commitment to implementing high quality corporate governance, including for environmental and social matters.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity develops and applies good corporate governance principles and effective self-regulatory practices and management systems that foster a relationship of confidence and mutual trust between the entity and the societies in which it operates.	The entity publicly commits to respecting the OECD Guidelines and/or UNGPs.	OECD guidelines, chapter 2, general policies 6 and 7 UNGP 11, 12 UNGPRF A1 GRI 103-2

2. The entity's board and/or management is qualified and adequately structured to oversee the entity's strategy, management and performance.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity has a board and/or management of effective composition and size with clearly delineated roles and responsibilities to adequately implement its corporate governance policies.	The entity has one or more documents setting out: A. the roles and responsibilities of its board and/or management, including in relation to the oversight of climate, environmental, and/or social issues that materially affect the entity; B. those matters expressly reserved to the board and those delegated to management; and C. its process for periodically evaluating the performance of its board and/or management. For listed entities, this document is a board charter or similar.	IFC corporate governance methodology UNGP 19 UNGPRF A2, A2.1 GRI 102-19, 102-20 NZX Corporate Governance Code

3. The entity's internal controls, systems and training are sufficient to ensure compliance with relevant laws and regulations, including those related to anti-bribery and corruption; fair competition and taxation; money laundering and consumer protection.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity has developed and adopted adequate policies and procedures for preventing, detecting and addressing bribery and other forms of corruption.	The entity has an anti-bribery and corruption policy and procedures in place that are tailored and proportionate to the entity's size, operations and risk exposure and overseen by the entity's directors and/or management. The entity's anti-bribery and corruption policy can be a standalone policy or form part of its code of conduct. The policy acknowledges the serious criminal and civil penalties that may be incurred and the reputational damage that may be done if the entity is involved in bribery or corruption, and prohibits conduct that could amount to bribery or corruption. It also outlines appropriate controls around political donations and/or offering or accepting gifts; and requires breaches of the policy to be reported to the appropriate person or body within the entity. The entity's anti-bribery and corruption procedures enable it to prevent, track, investigate and respond to allegations or incidents relating to bribery and corruption, and may include risk assessment and due-diligence processes, whistleblowing mechanisms and investigative procedures, as well as regular communication and training. The entity's anti-bribery and corruption policy and procedures are periodically reviewed for effectiveness.	SASB topic: Business ethics & transparency (mining industry) EM-MM-510a.1 (description of the management system for prevention of corruption and bribery throughout the value chain). ESRS G2 28, 30 NZX Corporate Governance Code Organised Crime and Anti-corruption Legislation Bill (2014)
The entity has robust systems in place to ensure compliance with the letter and spirit of the tax law and regulations of the countries in which it operates.	The entity treats tax governance and tax compliance as important elements of its oversight and broader risk management systems. In particular, the board or senior management has tax risk management strategies and/or systems in place – including assurance processes where applicable – to ensure that the financial, regulatory and reputational risks associated with taxation are fully identified and evaluated.	OECD guidelines, chapter XI.1, XI.2 GRI 207-2 ESRS 2 31 (a)

Indicators	Guidance	Alignment with existing standards and frameworks
The entity incorporates sustainability considerations into its guidelines/criteria for sourcing goods and services, to account for significant risks associated with environmental and social externalities created by suppliers through their operational activities.	The entity has a process for screening, selecting, monitoring, and engaging with suppliers on their environmental and social impacts that is proportional to the entity's size, operations and risk exposure.	GRI 414 SASB: Labour conditions in the supply chain; raw materials sourcing
The entity regularly implements communication and training programs to raise awareness of, and support compliance with, anti-bribery, corruption and fair competition laws and policies among employees and persons or entities linked by a business relationship.	The entity delivers communication and training on anti-corruption, bribery and fair competition to its management and employees in a form and frequency that the entity deems necessary to build capacity. Training promotes employee awareness of the importance of compliance with all applicable laws and regulations and covers the entity's commitments and expectations for employees and other business relationships.	NZX Corporate Governance Code OECD guidelines, X.4 GRI 205 ESRS G3 40, 42 Organised Crime and Anti-corruption Legislation Bill (2014)
The entity protects consumer privacy by ensuring it collects and uses consumer data in a lawful manner and takes all reasonable measures to safeguard the personal data it collects, stores, processes and disseminates.	Where an entity collects or uses consumer data, the entity has a system for identifying and addressing data security risks, including regular risk assessments of its data security systems, and takes necessary actions to mitigate any identified risks. The entity also discloses any incidents of violation of customer protections that have been reported or confirmed, including the remedial action(s) taken.	OECD guidelines VIII.6 SASB topic: Data security GRI 418

4. The entity has policies and mechanisms in place to enable effective stakeholder engagement.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity's board and/or management recognises that the entity is dependent on its social licence to operate and therefore relies on a range of stakeholders (including communities, consumers, suppliers, employees, governments, investors, regulators and suppliers) to operate and succeed.	The entity has clearly identified its key stakeholders and has a strategy or processes in place to engage with them and report material issues to the board and/or management.	NZX Corporate Governance Code

Indicators	Guidance	Alignment with existing standards and frameworks
The entity's board or management ensures the entity provides stakeholders with access to an operational grievance mechanism(s) or mechanisms that allows them to raise and seek resolution or remedy for grievances that may occur in relation to the entity's operations or actions.	The entity has an operational grievance mechanism(s) in place for stakeholders to address complaints and provide appropriate resolutions. The grievance mechanism(s) is legitimate, accessible, predictable, equitable, transparent, rights-compatible and a source of continuous learning in line with the UNGPs. The mechanism addresses a range of grievances, including human rights issues and whistleblowing, while ensuring access to other judicial or nonjudicial mechanisms is not impeded. Refer to the Human Rights and iwi/Māori criteria and indicators for further guidance on grievance mechanisms concerning human rights issues and iwi/Māori peoples.	UNGP guiding principle 31 OECD guidelines, chapter VIII OECD/LEGAL/-356

5. The entity discloses whether the entity, its board or management, including the board or management of any subsidiaries, has been convicted of corruption or bribery, breach of competition law, tax evasion, money laundering or tax avoidance.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity discloses, without prejudice to national laws and requirements, any misconduct related to bribery and other forms of corruption, and measures adopted to address cases of suspected bribery and other forms of corruption.	The entity discloses any confirmed incidents of bribery or corruption during the relevant reporting period, including sanctions or legal cases brought against the entity, its directors or employees and the remedial steps taken by the entity including any disciplinary action taken against offending directors or employees. The entity discloses all activities it undertakes in countries that rank among the 20 lowest on Transparency International's Corruption Perception Index.	OECD guidelines GRI 205 ESRS G2 41, 43
The entity discloses any instances in which it has been found guilty of tax evasion or tax avoidance through aggressive tax planning.	The entity discloses any instances in which it has been found guilty of tax evasion or tax avoidance through aggressive tax planning. The entity discloses any instances where the entity, its directors or management are convicted of violating the tax laws of the countries in which they operate, and the remedial actions taken, including any disciplinary action taken against offending directors or employees in the last five years. The entity provides a description of the mechanisms it has in place to raise concerns about the entity's business conduct and integrity in relation to taxation.	OECD guidelines GRI 207-2 ESRS 2 7

Indicators	Guidance	Alignment with existing standards and frameworks
The entity discloses, without prejudice to national laws and requirements, any misconduct related to anti-trust and fair competition, as well as the measures adopted to address such cases.	The entity discloses any confirmed violations of competition laws where the entity or its subsidiaries were named as a participant by a legal authority during the relevant reporting period. The disclosure includes information on legal proceedings and remedial actions implemented to prevent future breaches of anti-trust and fair competition laws and policies including any disciplinary action taken against offending directors or employees.	OECD guidelines GRI 206 SASB topic: Pricing integrity & transparency ESRS G2 45, G3 47

Human rights

1. The entity has a public policy in place that outlines the entity's commitment to respect human rights in line with the expectations of the UN Guiding Principles on Business and Human Rights (UNGPs).

Indicators	Guidance	Alignment with existing standards and frameworks
The entity publicly commits to respect all internationally recognised human rights, in line with the expectations outlined in the UNGPs.	The entity publicly commits to respecting all internationally recognised human rights as outlined by the UN Declaration on Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The entity also commits to aligning with the UNGPs. This commitment can be made in a standalone Human Rights Policy or integrated into other policy documents.	UNGP 11, 12, 16 OECD guidelines, chapter IV, commentary para 49 GRI 2 2021, disclosure 2-23 UNGC CoP G2 CHRB A1.1
The policy commitment is signed off at the most senior level of the entity.	The entity's highest governance body (e.g., Board) or most senior executive (i.e., the CEO) signs off on the policy commitment.	UNGP 16 OECD guidelines, chapter IV, commentary para 49 GRI 2 2021, disclosure 2-23 UNGC CoP G2 CHRB A.2.1
The policy commitment sets out expectations for workers, officers and directors and its business relationships.	The policy commitment clearly outlines expectations for workers, officers and directors and its business relationships (e.g., suppliers, joint venture partners, franchisees, customers) to respect human rights.	UNGP 16 OECD guidelines, chapter IV, commentary para 49 GRI 2 2021, disclosure 2-23 UNGC CoP HR2.1

2. The entity has a human rights due diligence process to identify, prevent, mitigate and account for how they address their actual and potential adverse human rights impacts through their operations and value chains, that is appropriate to the entity's size, circumstances and operating context.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity identifies and assesses its actual and potential adverse human rights impacts across its operations and value chain.	The entity proactively identifies and assesses its actual and potential (i.e., risks to human rights) adverse human rights impacts across its operations and supply or value chain on an on-going basis. When identifying and assessing its actual and potential adverse human rights impacts, entities should consider all internationally recognised human rights. While not ignoring other human rights issues, entities should consider actual and potential adverse human rights impacts related to employment, labour and working conditions, occupational health and safety, modern slavery, gender equality, non-discrimination, diversity and equal opportunity, and the rights of iwi/Māori peoples when conducting human rights due diligence. Having identified the actual and potential adverse human rights impacts including considering any actual and potential adverse human rights impacts related to the core social pillars above, the entity prioritises the most salient human rights issues for action. That is, the human rights at risk of the most severe negative impact through the entity's operations and supply or value chain. Saliency is determined by considering the severity – encompassing the concepts of scale, scope and irremediability – and likelihood of an adverse human rights impact. The process to identify and assess actual and potential adverse human rights impacts should take into consideration factors such as sectoral risks, geographical risks, risks related to at risk, marginalised or vulnerable populations and the entity's business model. It should also be informed by a range of sources including internal and external expertise and meaningful consultation with potentially affected stakeholders (see indicator on stakeholder engagement for further guidance). This process considers both risk of harm to people and risks to the business, though they will often overlap. However, saliency assessments should only be based on risk to people.	UNGP 17, 18 and 24 OECD Guidelines, Chapter IV, Commentary para 50 GRI 3 2021, Disclosure 3-3 UNGC CoP G6 and G7 CHRB B.2.1 and B.2.2

3. The entity has processes in place to enable the remediation of adverse human rights impacts in line with expectations of the UNGPs.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity has a grievance mechanism(s) in place that can receive human rights related complaints and makes efforts to cooperate with other legitimate grievance mechanisms and processes.	The entity has one or more mechanism(s) through which workers, communities, consumers and other stakeholders whose human rights may be adversely impacted by the entity (including by the entities' suppliers or other business partners as appropriate and in line with the UNGPs), can raise complaints or concerns in relation to human rights issues. The mechanism(s) may be managed by the company or by third parties. In order to ensure their effectiveness, the entity's grievance mechanisms should be legitimate, accessible, predictable, equitable, transparent, rights compatible, a source of continuous learning and based on engagement and dialogue (in line with the UNGPs). This includes establishing safeguards so complaints can be made without fear of retaliation or reprisal (e.g., confidentiality requirements, non-retaliation policy and the option for complaints to be made anonymously). The mechanism also does not prevent access to other judicial or non-judicial mechanisms and makes efforts to cooperate with any such legitimate grievance mechanisms or processes. Good practice also includes encouraging business partners to have their own grievance mechanism(s) in place that can receive human rights-related complaints. The entity discloses on the types of complaints made including complaints that were not processed and why, and the outcomes and follow-up activities for completed cases. This information can be aggregated and anonymised to safeguard complainants.	UNGP 22, 29, 30 and 31 OECD Guidelines Chapter IV, Commentary para 5 GRI 3 2021, Disclosure 3-3 UNGC CoP G8 and HR7 CHRB C.1, C.2 and C.4
The entity provides for or cooperates in remediation where it has identified it has caused or contributed to the adverse human rights impact.	Where it identifies it has caused or contributed to an adverse impact (in line with the UNGPs), the entity provides for or cooperates in effective remediation through legitimate processes. Remediation can be provided in a variety of forms (e.g., apology, restitution, rehabilitation, financial or non-financial compensation) and should be decided in consultation with affected stakeholders. The entity also takes actions to prevent similar adverse human rights impacts in the future. Where adverse human rights impacts have occurred that the entity has not caused or contributed to, but which are directly linked to its operations, products or services by their business relationships, the entity should seek to use its leverage to prevent and mitigate the impacts, and may choose to take a role in providing for or cooperating in remediation.	UNGP 13, 19, 22 and 31 OECD Guidelines Chapter IV, Commentary para 6 GRI 3 2021, Disclosure 3-3 UNGC CoP HR7 CHRB C.7

Iwi/Māori rights

1. The entity has processes in place to recognise the rights of iwi/Māori in line with Te Tiriti o Waitangi (Treaty of Waitangi).

Indicators	Guidance	Alignment with existing standards and frameworks
Te Tiriti o Waitangi	The United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) can be used to provide detailed guidance and a framework for interpreting and developing processes that align with Te Tiriti o Waitangi.	The United Nations Declaration of the Rights of Indigenous Peoples (UNDRIP) Te Tiriti o Waitangi

2. The entity has processes in place for Free, Prior and Informed Consent, inline with the UNDRIP principles and local guidance where available.

Indicators	Guidance	Alignment with existing standards and frameworks
Engagement practices are carried out in line with the UNDRIP principle of Free, Prior and Informed Consent.	Good practice protocols for iwi/Māori engagement practices include guidance on appropriately resourcing knowledge holders and iwi/Māori organisations to enable Free, Prior and Informed Consent. The entity may also explore opportunities for benefit-sharing with iwi/Māori communities where relevant.	IFC Performance Standard 7 Self-determination principle of UNDRIP
The entity adheres to measures that monitor impacts of activity on iwi/Māori and maintains compliance standards to minimise risk.	The entity conducts regular assessments to identify and evaluate potential and actual impacts on iwi/Māori communities. Iwi/Māori communities are involved in the assessment process. Assessments lead to the development of mitigation plans to address negative impacts. The entity undergoes regular independent audits to assess compliance with the criteria. There are clear mechanisms for reporting non-compliance or concerns. The entity promptly addresses any identified non-compliance issues.	IFC performance standard 7

3. The entity has processes in place to uphold the rights of Māori to control data about their people, culture, and resources.

Indicators	Guidance	Alignment with existing standards and frameworks
Data sovereignty	The entity has processes in place to uphold iwi/ Māori data sovereignty by ensuring that all data pertaining to indigenous cultural values and sites (where applicable) are the sole ownership of those that have provided it. The entity has processes to securely manage the data. The entity has processes in place to request access for any future uses of the data to the individual that provided it.	CARE principles (as a best practice guide)

Cultural heritage

1. The entity has processes in place to identify and manage historic and cultural heritage sites.

Indicators	Guidance	Alignment with existing standards and frameworks
The entity consults and collaborates with iwi/Māori to identify cultural heritage sites, artifacts and landscapes within its operations and avoids impacts on cultural heritage sites. Measures are taken to preserve sites.	The entity has processes to work with local iwi/ Māori and where available iwi management plans to identify cultural heritage sites, artifacts, and landscapes within its operations. Iwi/Māori communities are involved in the identification process to ensure cultural significance is accurately recognised. Traditional knowledge is used to inform the identification of cultural heritage sites. The entity seeks to avoid or minimise impacts on cultural heritage sites. Measures are implemented to preserve and conserve cultural heritage sites. Mitigation measures are monitored and evaluated to ensure their effectiveness.	IFC performance standard 1, 8 IRMA 3.7 cultural heritage Regional iwi management plans (available through regional councils) Cultural impact assessment guidance He Tauira – XRB voluntary reporting framework on how to articulate long-term impact for people and planet. Aotearoa New Zealand Stewardship Code
Cultural heritage	The entity has processes in place to identify and manage historic and cultural heritage sites. The entity seeks to avoid or minimise impacts on cultural heritage sites. Measures are implemented to preserve and conserve cultural heritage sites. Mitigation measures are monitored and evaluated to ensure their effectiveness.	New Zealand Heritage list/ Rāangi Kōrero