



# Supplier Guidance & Resources

This document provides practical guidance and trusted reference links to support our supplier network in meeting Custom Fleet's compliance requirements. This resource is intended to provide clarity on Custom Fleet's compliance expectations and prioritise meaningful remediation actions where gaps are identified.

Custom Fleet expects our supplier network can evidence a clear, structured plan to implement and continuously improve basic governance measures. We recognise that our suppliers operate at different scale and organisational maturity, and our expectations are aligned accordingly, with an emphasis on transparency, progress and demonstrable commitment.





## Modern Slavery

### Context and Purpose:

Worker exploitation, forced labour and modern slavery inflict severe and enduring harm on individuals, families and communities. These practices can be deeply embedded at multiple tiers of the supply chain, often remaining hidden from immediate view. Modern slavery risks may exist even where they are not directly visible or readily identifiable by businesses.

In alignment with these obligations, our supplier agreements include an express clause requiring suppliers to comply with all applicable modern slavery legislation and to take reasonable steps to prevent, detect and address modern slavery practices within their own operations and supply chains.

***"In performing this Agreement, you must comply with Modern Slavery Laws, but as a minimum (regardless of jurisdiction) must take reasonable steps to identify, assess and address risks of Modern Slavery in your operations and supply chains[...]"***

### Custom Fleet Expectation of our Suppliers:

- Your organisation understands where modern slavery risks could arise in your operations and supply chain.
- Your organisation can effectively manage those risks through reasonable governance and operational measures. For example, documented policies or codes of conduct are in place, and you have established controls in your organisation and supply chain.
- Your organisation actively seeks to improve transparency, oversight and practices supporting modern slavery risks.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Modern Slavery governance and risk management practices. This could include:

- Nominating a responsible owner for Modern Slavery risk (e.g., Legal, Procurement, Risk or Compliance) and
- Documenting or formalising how your organisation governs modern slavery risks governance.
- Risk screening of key suppliers and high-risk categories (country, sector, labour model).
- Introducing an employee or supplier code of conduct or adding modern slavery clauses to supplier contracts.
- Providing key staff (e.g. Procurement, Supply Chain, purchasing teams or Human Resources) with modern slavery awareness training.
- Establishing a process to ensure staff, suppliers and customers can raise issues, complaints or concerns to your organisation



## Resources:

Resource	What it provides	How to use it
<a href="#">Plan of action against forced labour, people trafficking and slavery (MBIE)</a>	New Zealand's all-of-government framework (2020–2025) outlining prevention, protection and enforcement actions.	Use it to understand NZ's approach, terminology, and expected actions across prevention, protection and enforcement.
<a href="#">Modern slavery and worker exploitation (MBIE)</a>	Government overview of modern slavery and worker exploitation, including the policy context and definitions.	Use as a reference for definitions and NZ context when describing your risk identification and controls.
<a href="#">Modern Slavery Bill 242–1 (2026) – Members' Bill (NZ Legislation)</a>	Proposed NZ modern slavery reporting framework (not yet law) covering reporting obligations and offences.	Monitor for changes; use it to anticipate what good reporting and governance could look like in NZ.
<a href="#">Supplier Code of Conduct (NZ Government Procurement) – PDF</a>	Government expectations for ethical behaviour, labour and human rights, health & safety, and environmental sustainability.	Use as a benchmark: align your internal policies and supplier management practices to these expectations.
<a href="#">Supplier Code of Conduct – Questions and Answers (NZ Government Procurement) – PDF</a>	Plain-English guidance on how the Supplier Code of Conduct can be implemented and evidenced.	Use to understand what evidence is practical (policies, practices, training, certifications) for questionnaire responses.
<a href="#">Ethical and sustainable work practices: A guide for procurers (Employment NZ) – PDF</a>	Practical steps for setting expectations, assessing compliance and monitoring labour and human rights risks in supply chains.	Use the step-by-step approach to strengthen supplier due diligence and ongoing monitoring.
<a href="#">Identifying and minimising labour rights issues in your supply chains (Employment NZ) – PDF</a>	Short, practical guidance on supply-chain mapping, risk assessment and engagement with suppliers.	Use it as a quick checklist to document your minimum due diligence steps and evidence them.
<a href="#">Combatting modern slavery (MFAT) – trade policy overview</a>	NZ's trade policy and international engagement on modern slavery (including references to the Plan of Action).	Use to support external-facing statements about your approach and international supply chain considerations.



## Privacy & Data Protection

### Context and Purpose:

Suppliers who handle personal or sensitive information must protect it appropriately. Good privacy governance reduces legal risk, protects customers and strengthens trust. Suppliers must comply with the [Privacy Act 2020](#). This includes taking reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure, and ensuring personal information is collected, used and disclosed in accordance with the Act.

### Custom Fleet Expectation of our Suppliers:

- Your organisation has documented privacy and data policies and procedures (appropriate to your size and risk).
- Your organisation understands its obligations under the Privacy Act 2020.
- Your staff are adequately trained to meet privacy procedures and protect information systems and data.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Privacy governance and risk management practices. This could include:

- Implement core security controls (access control, multi-factor authentication where possible, backups, patching, encryption where appropriate).
- Deliver privacy awareness training to staff who handle personal information.
- Create and test a data breach response plan (roles, triage, notification, lessons learned).



## Resources:

Resource	What it provides	How to use it
<a href="#">Privacy Act 2020 – overview (Office of the Privacy Commissioner)</a>	Plain-English overview of the Information Privacy Principles and key requirements of the Privacy Act 2020.	Use to confirm your policy coverage for collection, use, disclosure, retention and security of personal information.
<a href="#">Complying with the Privacy Act (OPC) – your obligations</a>	Guidance on privacy governance, including the requirement for every agency to have a Privacy Officer.	Use to confirm governance basics (Privacy Officer, accountability, policies) and align your internal responsibilities.
<a href="#">Office of the Privacy Commissioner   E-learning</a>	Practical tools, templates and guides to help organisations build privacy governance and processes.	Use to strengthen documentation (policies, checklists) and improve consistency in privacy practices.
<a href="#">Sorting out privacy breaches (OPC)</a>	Guidance on identifying, assessing and responding to privacy breaches, including serious harm assessment.	Use to build or refine your breach response process and ensure you assess 'serious harm' correctly.
<a href="#">NotifyUs – report a serious privacy breach (OPC)</a>	Official reporting pathway and guidance for notifying OPC of a notifiable privacy breach.	Use to confirm notification thresholds, what information to capture, and how/when to notify OPC.
<a href="#">Privacy Act 2020 – full text (NZ Legislation)</a>	Authoritative source of the Privacy Act 2020 and related provisions.	Use for legal verification (definitions, obligations, breach notification requirements) where needed.



## Conduct, Conflict of Interest, Anti Bribery & Corruption

### Context and Purpose:

Organisations are expected to effectively manage conduct related risks including bribery, corruption and conflicts of interest to demonstrate compliance under New Zealand law, including the [Crimes Act 1961](#) and the [Secret Commissions Act 1910](#) (bribery and corruption offences). Failure to maintain effective governance and risk management frameworks can result in civil and criminal penalties, regulatory action, and significant reputational damage.

### Custom Fleet Expectation of our Suppliers:

- Your organisation sets appropriate standards for employee and supplier conduct
- Your organisation has appropriate standards and controls to manage conduct risks relating to employees and suppliers (including bribery and corruption)
- Your organisation can identify and manage potential, perceived or actual conflicts of interest.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, sector and risk profile, Custom Fleet may identify other opportunities for your organisation to further strengthen Conduct related governance and risk management practices. This could include:

- Adopt a basic anti-bribery & corruption policy (including gifts/hospitality, conflicts of interest, reporting frameworks).
- Implement simple controls: approvals, segregation of duties, third-party due diligence for higher-risk engagements.
- Provide staff training and a confidential reporting channel.
- Formalise how your organisation responds to conduct related concerns).



## Resources:

Resource	What it provides	How to use it
<a href="#">Financial offences   New Zealand Ministry of Justice</a>	Government overview of bribery/corruption harms and links to NZ anti-bribery resources for organisations.	Use as a starting point to understand expectations and locate practical tools and guides.
<a href="#">Saying No to Bribery and Corruption – A Guide for NZ Businesses (MoJ) – PDF</a>	Practical guidance for businesses on understanding bribery risks and implementing prevention measures.	Use to assess your current controls and strengthen your anti-bribery and corruption programme.
<a href="#">Create a fraud and corruption policy (MoJ) – PDF</a>	Template-style guidance to help build a fraud and corruption policy and supporting controls.	Use to draft or refresh your policy, including roles, reporting, training and investigation steps.
<a href="#">Facilitation payments and NZ's anti-bribery laws (MoJ) – PDF</a>	Guidance on facilitation payments and how they relate to New Zealand's anti-bribery settings.	Use to clarify prohibited conduct and set clear internal rules for staff and third parties.
<a href="#">Crimes Act 1961 – Bribery and corruption (NZ Legislation)</a>	Primary NZ statute covering bribery and corruption offences (including public sector bribery).	Use for authoritative legal reference and to understand offence types and definitions.
<a href="#">Secret Commissions Act 1910 (NZ Legislation)</a>	NZ statute addressing secret commissions and private-sector bribery-type conduct.	Use for legal reference when designing controls for gifts, hospitality and conflicts of interest.
<a href="#">Serious Fraud Office (SFO) – main site</a>	Lead agency investigating and prosecuting serious or complex financial crime, including bribery and corruption.	Use to understand reporting pathways and NZ enforcement context.
<a href="#">Learning modules – bribery and corruption (SFO)</a>	Free online training modules covering fraud, bribery and corruption risks and red flags.	Use as staff training evidence and to build baseline capability across your organisation.
<a href="#">Guidance: Bribery and corruption (Te Kawa Mataaho / Public Service Commission)</a>	NZ public sector guidance and links to SFO/MoJ resources for building anti-bribery controls.	Use to benchmark governance expectations and locate additional templates and resources.



## Organisational Resilience

### Context and Purpose:

Organisational resilience enables businesses to anticipate, withstand and respond effectively to operational, financial, technological and external disruptions. In an increasingly complex and interconnected environment, disruptions may arise from cyber incidents, supply chain interruptions, regulatory change, natural disasters or geopolitical events. These risks are not always predictable or immediately visible, yet they can significantly impact service continuity, financial stability and stakeholder trust. A resilient organisation maintains appropriate governance, risk management and business continuity arrangements to minimise disruption and recover in a timely and controlled manner. In alignment with our broader risk management framework, we expect suppliers to implement proportionate measures that support continuity of critical services and strengthen the resilience of their operations and supply chains.

### Custom Fleet Expectation of our Suppliers:

- Your organisation understands the key operational, technological and third-party risks that could materially disrupt your operations and service to Custom Fleet.
- Your organisation maintains proportionate business continuity and incident response arrangements to manage and recover from disruptions.
- You notify Custom Fleet in a timely manner of any material incidents that may impact services or contractual requirements to Custom Fleet.

### Enhancing Practice – Guidance for Suppliers:

Depending on your organisation's scale, complexity and risk profile, Custom Fleet may identify the following opportunities to further strengthen resilience and governance practices:

- Document and periodically test a Business Continuity Plan (BCP) and Disaster Recovery Plan (DRP).
- Conduct scenario tests or exercises to assess your readiness for high-impact events (e.g. cyber incident, system outage, key supplier failure).
- Identify critical services, systems and third-party dependencies, and implement contingency arrangements where appropriate.
- Provide basic resilience and incident response awareness training to relevant staff.
- Periodically review insurance coverage and financial risk mitigation measures to support your organisation's recovery capability.



## Resources:

Resource	What it provides	How to use it
<a href="#">Get your work ready for an emergency (Get Ready – NZ Civil Defence)</a>	Workplace emergency and continuity guidance, including planning prompts and downloadable templates.	Use to develop or strengthen your emergency plan and incorporate staff communication and recovery steps.
<a href="#">Continuity and contingency planning (business.govt.nz)</a>	Step-by-step business continuity planning guidance for NZ organisations.	Use as a practical framework to build a Business Continuity Plan (BCP) and assign responsibilities.



## Sustainability & Environmental Management

### Context and Purpose:

Sustainability obligations are increasing across public and private sector supply chains. Suppliers must comply with applicable New Zealand environmental legislation, including the [Resource Management Act 1991](#), [Waste Minimisation Act 2008](#), and [Climate Change Response Act 2002](#) (including emissions reporting obligations where applicable). Suppliers are expected to actively manage environmental risks, work to reduce greenhouse gas emissions and waste. Failure to appropriately manage environmental impacts or substantiate sustainability claims can result in regulatory penalties, enforcement action, contractual risk, and reputational damage.

### Custom Fleet Expectation of our Suppliers:

- Where required, your organisation meets all environmental protection laws
- Your organisation understands and controls key environmental impacts relevant to your operations (e.g., energy, fuel, emissions, waste, water and materials).
- Your organisation understands and manages material value-chain (Scope 3) impacts where relevant, including engaging suppliers and contractors.
- Your organisation only makes accurate and verifiable sustainability claims (and avoids "greenwashing").
- Your organisation establishes and monitors practical environmental or sustainability improvement actions (e.g., reducing electricity use, improving fleet efficiency, reducing waste, engaging key suppliers).

### Key Recommendations for Improvement:

- Your organisation has documented commitments and controls (e.g., an environment/sustainability policy, targets, action plans or an environmental management system).
- Your organisation can provide evidence of emissions calculations and reduction initiatives (e.g., energy efficiency, renewable electricity, fleet/transport changes, waste reduction).
- Your organisation has an accountable owner for sustainability/environmental risks.
- Your organisation can identify material impacts and collect baseline data (electricity, fuel, travel/transport, waste volumes and key purchased items where relevant).
- Your organisation can estimate a basic greenhouse gas inventory (start with Scope 1 and Scope 2), using recognised methods (e.g., the GHG Protocol) and Australian emission factors (NGA Factors).



## Resources:

Resource	What it provides	How to use it
<a href="#">Previous Greenhouse Gas Inventories   Ministry for the Environment</a>	Guidance on calculating and reporting organisational greenhouse gas emissions.	Use as the foundation for your GHG inventory (Scopes, boundaries, methodology and data quality).
<a href="#">Aotearoa New Zealand Climate Standards (XRB)</a>	Mandatory climate-related disclosure standards (NZ CS 1-3) for in-scope entities and reporting guidance.	Use to understand expectations for governance, strategy, risk management and metrics/targets.
<a href="#">Energy efficiency resources for businesses (EECA)</a>	Tools and guidance for reducing energy use, improving efficiency and lowering operational emissions.	Use to identify efficiency opportunities and to support your energy management and emissions reduction actions.
<a href="#">Emissions Trading Scheme (ETS) (EPA)</a>	Official overview of NZ ETS obligations and access to the ETS register (where relevant).	Use to understand whether your activities trigger ETS obligations and how compliance is managed.
<a href="#">Waste Minimisation Act 2008 (NZ Legislation)</a>	Core NZ legislation supporting waste minimisation, product stewardship and levy settings.	Use as a legal reference for waste responsibilities and regulated product stewardship context.
<a href="#">Priority product stewardship (MfE)</a>	Guidance on priority products and regulated product stewardship schemes (e.g., tyres, e-waste, packaging).	Use to understand upcoming obligations and opportunities to improve circularity and waste management.



## Need help?

If you are unsure which resources apply to your organisation, start with the minimum next steps above and use the linked guidance to build from there. For tailored advice, consider seeking legal counsel or specialist compliance support.



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