



Moving to New Zealand: An overview of our capability

Make the move to New Zealand seamless

Moving countries is a minefield – new regulations, new systems, new processes, new rules. We're here to help.

We guide new and intended migrants on all legal aspects of their move – from visas and immigration, tax issues, to investing and doing business in New Zealand and structuring and protecting those investments.

How we help new migrants

Internationally mobile entrepreneurs and families require highly specialist legal advice across a wide range of disciplines. We work seamlessly to draw upon the full service we have at MinterEllisonRuddWatts, to ensure a smooth transition to New Zealand. This includes our specialists in:

- Immigration advice and applications
- Tax advice
- Private Wealth, Trusts and Philanthropy advice and drafting
- Real Estate advice and preparing agreements to purchase properties
- Corporate and Commercial advice and due diligence of investments

Our collaborative approach also means we are adept at working with family offices, overseas advisers and other external advisers to develop and implement a plan holistically and efficiently.

We speak your language

For Asian migrants, our firm includes several native Mandarin and Cantonese speakers.

Key contacts



Aimee Mitchell

Partner
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Andrew Ryan

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Daniel Fielding

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New Zealand Residency for Investors

The Active Investor Plus Visa

New Zealand's Active Investor Plus Visa (**AIP Visa**) is designed to increase the flow of foreign capital into New Zealand and attract skilled and experienced active investors into areas that align with the Government's economic strategy.

The AIP Visa provides residency to those who wish to participate in New Zealand's investment ecosystem and make a significant contribution to New Zealand's economy.

What are the requirements?

As of 1 April 2025, to obtain an AIP Visa a principal applicant must:



Invest **NZD10 million** into investments that fall within the **Balanced Category** for a minimum investment period of five years; or



Invest **NZD5 million** into investments that fall within the **Growth Category** for a minimum investment period of three years.



Meet Immigration New Zealand's fit and proper person requirements.



Meet Immigration New Zealand's health and character requirements.



Demonstrate ownership of the nominated funds and/or assets.



Demonstrate that the nominated funds and/or assets have been legally earned or acquired.



Invest the nominated funds and/or assets in Acceptable Investments.



Spend at least either 21 days (Growth Category) or 105 days (Balanced Category) in New Zealand over the investment period.*

Family members included in an AIP Visa application must also meet the necessary health and character requirements.

After an AIP Visa application is approved in principle, the principal applicant has six months to transfer their nominated funds and make their investments. Applicants may request a one-off 6-month extension if they can provide evidence they have tried and been unable to transfer and invest their funds.

Applicants will be required to complete an "Investment Questionnaire" at each investment retention checkpoint following the investment of funds into New Zealand.

*The requirement to spend 105 days in New Zealand is reduced by 14 days for each NZD1 million invested on top of the NZD10 million investment requirement, for a maximum reduction of 42 days.

WHAT IS AN 'ACCEPTABLE INVESTMENT' UNDER EACH CATEGORY?



Growth

Direct investments into businesses approved by Invest New Zealand, such as approved listed equities (exchange traded funds or managed funds).

Managed funds which are on the acceptable managed fund list maintained by Invest New Zealand.



Balanced

Listed equities which must be either an Invest New Zealand approved exchange traded fund or approved managed fund.

Philanthropic donations into organisations that are a registered charity and meet certain requirements.

Property development investment into either a new residential, commercial or industrial property, or an existing commercial or industrial property.

Bonds issued by the New Zealand Government or local authorities, a New Zealand Resident Entity, a New Zealand firm, a New Zealand registered bank, a bond in a finance company or a managed fund in bonds, all with varying requirements.

Growth category investments as described above.

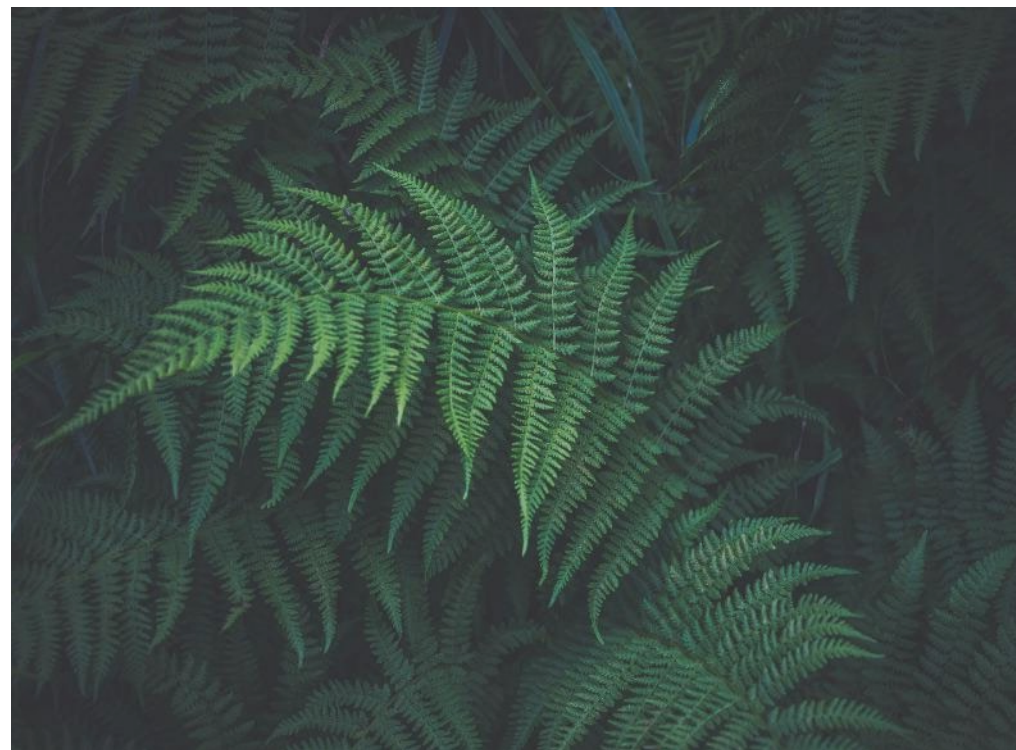
More information about what constitutes an Acceptable Investment for the AIP Visa can be found [here](#).

INVEST NEW ZEALAND'S INVOLVEMENT

While the AIP Visa is processed through Immigration New Zealand, Invest New Zealand is heavily involved in the promotion of the visa and aftercare services provided to successful applicants. Under the Immigration Instructions, Invest New Zealand is the 'gatekeeper' as to what constitutes acceptable 'direct investments' and 'managed funds'. Specifically, Invest New Zealand is responsible for:

- determining if an investment into a New Zealand entity is a direct investment;
- assessing whether a Managed Investment Scheme is an acceptable managed fund; and
- maintaining a list of managed funds.

Please do not hesitate to reach out to one of our experts if you would like further information regarding the AIP Visa.



Taxation

New Zealand imposes tax on the worldwide income of tax residents, and on the New Zealand-sourced income of non-residents.

Residence

An individual is a New Zealand tax resident from the earlier of:

- the date they acquire a permanent place of abode in New Zealand; or
- the date they have been in New Zealand for more than 183 days in any rolling 12-month period (the days do not have to be consecutive and part days count as whole days).

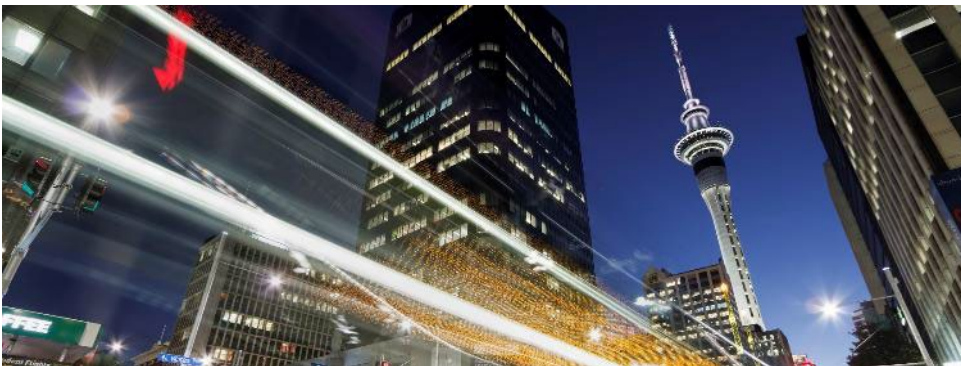
A permanent place of abode means a place where a person habitually resides from time to time even if they spend periods of time overseas and have other homes outside of New Zealand. It can be possible to be New Zealand tax resident even if a person does not spend much time in New Zealand.

Tax exemption for new residents

A new tax resident is entitled to a 4-year tax exemption, which exempts them from New Zealand income tax for most types of foreign income. Foreign sourced employment and services income will not be exempt and will be subject to New Zealand tax during the transitional residency period.

No capital gains tax

New Zealand does not have a broad-based capital gains tax, although some types of capital gain can be included in a person's taxable income. In addition, New Zealand does not impose any stamp duties, wealth taxes, or inheritance taxes.



Principal rates of taxation in New Zealand:

NATURAL PERSON



Taxable income NZD*	Marginal tax rate
0–15,600	10.5%
15,601–53,500	17.5%
53,501–78,100	30%
78,101–180,000	33%
180,001+	39%

COMPANIES



Taxed at the flat rate of
28%

TRUSTS



Taxed on trustee income at the flat rate of
39%

Withholding tax

New Zealand imposes withholding taxes on dividends, interest and royalties sourced in New Zealand and derived by non-residents. Withholding tax rates are generally able to be reduced by double tax treaties. Advice should be sought on which treaty applies to determine the applicable withholding.

Non-resident withholding tax rates as modified by NZ tax treaties

Type of income	Standard Rate	Preferential Rates
Dividends	30%	0%, 5% or 15%*
Royalties	15%	5% or 10%
Interest	15%	10%

*NRWT on dividends will most commonly be reduced to 15% for investors, however, it can be further reduced and sometimes eliminated under a treaty.

Buying a home in New Zealand

Foreign investment rules mean that investing in land in New Zealand often requires prior approval of the Overseas Investment Office (OIO) depending on the type of interest and land involved.

New Zealand's Overseas Investment regime regulates the purchase of "sensitive land" (including residential land) by overseas persons (including most Active Investor Plus (AIP) visa holders). While the rules can be detailed, there are clear pathways available for those looking to acquire a home.

On this page we focus on those pathways for buying or building on "residential land", being land that is classified as "residential" or "lifestyle" under the District Valuation Roll. Applicants will need to be careful that the land they intend to purchase is not also "sensitive" for another reason: for example, because it is non-urban land comprising more than 5ha, or because it is farmland. If the land is considered sensitive for another reason, a more complex consent process will likely apply.



Become "Ordinarily Resident"

Once an AIP migrant becomes "ordinarily resident" in New Zealand, they can purchase any property, including residential property, without needing OIO consent. In addition to holding your AIP (or other residence class) visa, you must:

1. Have lived in New Zealand for at least 12 months;
2. Have been physically present for at least 183 days in that 12 month period; and
3. Be a New Zealand tax resident.



Apply for OIO Consent – using the "One Home to Live In" pathway

AIP visa holders can apply for consent to buy just one home classified as "residential" or "lifestyle" land. In addition to holding your AIP (or other residence class) visa, conditions generally include that you must:

1. Intend to become "ordinarily resident" in New Zealand (as evidenced by a statutory declaration);
2. Intend to live in your home as your main residence; and
3. Move in within 3 months of acquisition.

Consent can be sought on a pre-approval basis, to provide flexibility when purchasing at auction or other competitive bidding scenarios.



High-Value pathway with no requirement to be Ordinary Resident

AIP visa holders are able to rely on a new pathway to buy or build one home with a value of at least NZD 5 million, with no requirement to become ordinarily resident. This pathway provides a simplified process for certain high-value acquisitions. OIO consent will still be required, but with lower application fees, shorter processing times, and limited grounds for refusal.

Legislation creating this pathway came into effect on 6 March 2026.



A snapshot of how we support new migrants



To find out more about our firm's capabilities click [here](#).

