

# **Statement of Investment Policy and Objectives (SIPO)**

## **SuperLife UK Pension Transfer Scheme**

**Effective from 19 November 2025**

## Contents

---

1.	Description of the Scheme	3
2.	Manager and supervisor	3
3.	Investment philosophy	3
4.	Investment strategy	4
5.	Investment objective	5
6.	Investment policies	5
7.	Investment performance monitoring	8
8.	Investment strategy review	8
9.	SIPO compliance and review	9
10.	No guarantee of investments in the Scheme	9
	Appendix A – Asset classes	11
	Appendix B – Market indices	12
	Appendix C – Fund objectives and strategy	13

## 1. Description of the Scheme

---

The SuperLife UK Pension Transfer Scheme (**Scheme**) is registered under the Financial Markets Conduct Act 2013 (**FMCA**) as a superannuation managed investment scheme.

As at the date of this SIPO, the Scheme offers ten funds (each a **Fund** and together the **Funds**), offering investors Funds with different levels of risk and currency exposure. The diversified Funds have actively managed asset allocations and all Funds have a passive underlying security management strategy. The Funds available to members are:


- NZD Conservative Fund No. 2
- NZD Balanced Fund
- NZD Growth Fund No. 2
- NZD Balanced Fund No. 2
- NZD International Equities Fund
- NZD Australasian Equities Fund
- NZD Bond Fund
- NZD Real Assets Fund
- NZD Cash Fund
- NZD UK Cash Fund

Your money is pooled with other investors' money and invested in various investments. We will invest your money and charge you a fee for our services. The returns of each Fund are dependent on the investment decisions of the Manager, Lifetime Asset Management Limited, and the performance of the investments. The value of those investments may go up or down.

The Funds are invested in underlying funds. Performance is measured against the relevant index for each asset class return and tracking performance. Foreign currency exposures may be hedged back to New Zealand Dollars.

The investments are represented by units. The value of an investor's interest in the assets of a Fund is determined by multiplying the units attributable to the accounts held by the investor by the relevant unit price. No investor acquires an interest in any particular asset of a Fund to which their units in the Fund relate.

We may close, wind up, or alter the Funds at any time in accordance with the Scheme's trust deed (**Trust Deed**).

 See **Appendix A** for more information on the asset classes our Funds invest in.

## 2. Manager and supervisor

---

Lifetime Asset Management Limited is the manager of the Scheme (**Lifetime, Manager, we, us and our**). As the Manager, we are responsible for managing the investments of the Funds.

Public Trust is the licensed supervisor of the Scheme (**Supervisor**). The Supervisor is independent of us and supervises how we run the Scheme, for the benefit of you and other members.

## 3. Investment philosophy

---

Our investment philosophy is based on the following set of fundamental beliefs:

- Long-term investments outperform short-term investments.
- The benchmark asset allocation of a fund is the primary driver of investment risk and return.

- We expect a well-diversified portfolio to provide investors with a less volatile investment experience, while single sector funds invested mainly in growth orientated assets (like shares and property) may provide the opportunity for improved investment returns albeit under more volatile conditions.
- We value quality, simplicity and transparency when selecting investments.
- By offering multi-asset-class funds, we maximise diversification for investors.
- The importance of strong governance and efficient portfolio management and implementation.
- The relationship between risk and return means that growth assets are likely to deliver higher returns over time but may be more volatile (prices falling as well as rising) while income assets are usually less volatile but are also likely to deliver a lower return over the long term.
- The integration of environmental, social and governance (**ESG**) factors into our investment management processes because we believe that these factors are some of the drivers of long-term value for the Scheme's investors and their investments.

## 4. Investment strategy

---

We seek to provide investors with a range of investment choices and investment management styles to enable them to tailor a portfolio that suits their unique goals and needs.

The Scheme offers a range of fund types, including:

- Diversified Funds that provide exposure to a range of asset classes with varying ranges of benchmark asset allocations and ranges to provide differing balances of risk and return; and
- Single sector Funds that primarily provide exposure to a single asset class.

We determine the investment strategy, objectives and policy of each Fund and set the benchmark asset allocations and ranges (where applicable) that reflects that strategy, objectives and policy (as set out in the Appendix C). We then select one or more underlying funds and underlying fund managers that have adopted strategies, objectives and policies that provide the exposure required for the Funds.

Underlying fund managers used by the Funds may invest in a broad range of shares (also known as equities), fixed interest investments, listed and unlisted property trusts/funds, listed infrastructure investments, cash instruments and in managed funds. Securities held by underlying fund managers or appointed investment managers may be listed or unlisted. Underlying fund managers may borrow, short-sell securities and use derivatives.

The underlying fund managers at the date of this SIPO are:

- Smartshares Limited
- Simplicity NZ Limited
- Kernel Wealth Limited

Underlying fund managers may appoint a different investment manager to make the decisions about what their underlying fund invests in.

Where the assets of a Fund are not invested in underlying funds, the assets may, from time to time be placed on deposit with one or more New Zealand registered banks. The underlying funds or any investments accessed, and the underlying fund manager(s) may be changed at any time without notice to investors. Details of the investments of each Fund can be found in the most recent fund update for each Fund.

## 5. Investment objective


---

The investment objective of the Scheme is to provide investors with a range of funds that individually or in combination will enable investors to meet their short, medium or long-term investment objectives in a manner that is consistent with their own individual risk/return profiles.

We aim to achieve this through the individual investment strategies and objectives for each fund.

All diversified funds have income and growth targets, as well as benchmark asset allocations and ranges for each asset class. The single sector funds invest in a single asset class.

The underlying funds (selected by us to achieve investment in the asset classes) may be invested either directly or indirectly (such as investment in further underlying funds).

 See **Appendix C** for more information on the objectives of our Funds.


## 6. Investment policies

---

### Currency hedging policy

Hedging may be used by the Scheme to manage the exposure of assets to exchange rate fluctuations. A hedged position will not produce the full benefit of a favourable exchange rate movement, but at the same time will not expose the fund to the full loss potential of an unfavourable exchange rate movement. A fund which incorporates a currency hedge provides a buffer against currency fluctuations either in whole, or in part.

For each of the Funds with foreign currency exposure, we have adopted a currency hedging policy and monitoring process that is implemented within the underlying funds by the underlying fund managers. Hedging is not undertaken directly within the Funds.

 See **Appendix C** for more information on the currency hedging of each of our Funds.

### Derivatives policy

Financial instruments known as ‘derivatives’ may be used for the purposes of risk management, performance enhancement or to optimise investment strategy implementation (i.e., as an alternative to investing in a physical asset). The use of derivatives is not considered in isolation but rather as part of the overall investment strategy.

If an underlying fund contains derivatives, this is implemented within and at the underlying fund level and not directly within, or at, the fund level.

### Market risk management policy

Market risk is managed by selecting and monitoring underlying funds assessed as consistent with the investment strategy of the Fund and the Fund benchmark and invested within the permitted ranges.

### Credit risk management policy

We select underlying fund managers with diversified fixed interest portfolios.

## Rebalancing policy and limit break reporting

Market movements and cash flows can result in the actual asset allocations becoming different from the benchmark asset allocations. To ensure that actual asset allocations remain close to the benchmark asset allocations and within the maximum permitted ranges as stated in Appendix C, we have set appropriate internal operating range limits for exposure to underlying asset classes, and we monitor them regularly to ensure that the maximum permitted range limits, as detailed in Appendix C, are not breached.

The internal operating range limits have been designed based on the maximum permitted range limits of the underlying funds, with an appropriate margin. If, at any time, any allocation falls outside of the internal operating ranges, a review is triggered with a view to rebalance to restore the allocation within the internal operating ranges and towards the targeted benchmark asset allocations within five working days.

For the avoidance of doubt, the 'internal operating ranges' are not the maximum permitted range limits – they are simply the level of variance where we would normally consider making adjustments to the asset allocations to move towards the benchmark asset allocations and to prevent any breach of the maximum permitted ranges (a limit break) occurring.

A 'limit break' is any breach of any limits on either the nature or type of investments that may be made by a fund, or the maximum permitted range being the proportion of each type of assets that may be invested in.

In determining whether a limit break is material, the following factors will be considered:

- the size of the breach, in relation to the fund;
- any losses to members;
- whether the breach involves related party transactions;
- whether the breach is an isolated incident, or part of a recurring pattern of breaches;
- if the breach causes the PDS, registry entry, or an advertisement to which the offer relates, to be false or misleading;
- how quickly the breach is rectified after the manager becomes aware of the breach;
- how long the breach lasted.

In accordance with the Financial Markets Conduct Regulations 2014 (**FMCR**), we are required to provide a limit break report for the Scheme to the Supervisor within 10 working days after the end of each quarter of each year. If a material limit break occurs during the quarter and is not corrected within five working days after the date that we become aware of the limit break, we must report the limit break to the Supervisor and provide the information required as prescribed in the FMCR.



See **Appendix C** for more information on benchmark asset allocations and maximum permitted ranges.

## Tactical asset allocation policy

Based on the recommendations from our investment committee, we will consider tilting the allocation of underlying funds, within the maximum permitted ranges, and the sector exposure they provide, with the intention of providing an improved investment performance through short to medium term tactical asset allocations.

## Liquidity and cash management policy

Funds may hold transactional cash for investor transactions and operational purposes. This is in addition to the permitted investments invested in by the underlying fund managers.

The Scheme bank account is monitored daily as part of the unit pricing process, and the monitoring of the Funds' liquidity levels and any associated transactions is undertaken as part of the daily bank account reconciliation process. We monitor each fund's liquidity levels to ensure that there are sufficient available funds to meet obligations (which include withdrawals, taxation payments, fees and expenses) during normal market conditions.

### **Pricing/Valuation policies**

The assets of each Fund are valued by an independent external party, Adminis NZ Limited, every working day, in accordance with their pricing and valuation policies. These policies set out the valuation principles to be applied to determine asset values for use in the calculation of the Net Asset Value (**NAV**) of the Funds. The primary purpose of deriving this NAV is to determine the appropriate unit price at which investor transactions may be processed as well as to determine the value of investor balances for the calculation of related fees.

The policies have been constructed with reference to industry best practice, NZ IFRS accounting standards, and informed by standards and guidelines introduced in Australia. The policies also comply with any legislation introduced in New Zealand by relevant authorities. The pricing and valuation methodologies adopted ensure the unit pricing and valuation process is fair and equitable, transparent, applied consistently and reviewed regularly.

### **Taxation policy**

The Scheme is a Portfolio Investment Entity (**PIE**). Tax on investment returns is calculated at each investor's Prescribed Investor Rate (**PIR**) (currently either 10.5%, 17.5% or 28.0% depending on each investor's circumstances) and paid to Inland Revenue on each investor's behalf annually.

For more information about the tax consequences, see the 'Other Material Information' document on the Disclose Register at [disclose-register.companiesoffice.govt.nz](https://disclose-register.companiesoffice.govt.nz) (click 'Search for an offer' and search for 'SuperLife UK Pension Transfer Scheme').

### **Responsible investment policy**

We believe that over the long term, companies with strong ESG practices should deliver stronger risk adjusted returns than those without. In selecting an underlying fund manager, one of the selection criteria is the manager's ESG practices.

The Manager and the underlying fund managers generally seek out companies with good ESG practices.

The Scheme currently offers a range of investment options to the Scheme's investors, using underlying fund managers with differing approaches to responsible investing.

### **Related party transactions policy**

Any transactions with related parties of the Scheme will be conducted in accordance with the rules on related party transactions that apply to managers of managed investment schemes (MIS managers) under the FMCA. The general rule under the FMCA is that the manager (and any investment manager, administration manager, or other person to whom the manager has contracted some or all of its manager functions) of a scheme is prohibited from entering into a transaction that provides for a related party benefit to be given.

The FMCA does provide an exception to this rule whereby the manager can enter into a transaction that provides for a related party benefit, if the manager:

- Notifies the Supervisor of the transaction, the related party benefits given under that transaction, the key terms of the transaction; and either:
  - the transaction is 'permitted', and the manager certifies to the Supervisor to this effect; or

- the manager obtains the Supervisor's consent to the transaction, which may only be given where the Supervisor considers it to be in the best interests of investors or it is approved by or contingent on approval by a special resolution of affected investors.

Any related party transaction entered into requires the approval of our Board.

For further information on the rules on related party transactions that apply to MISs under the FMCA, please visit the guidance library for managed investments on the FMA website at [fma.govt.nz](https://fma.govt.nz).

### Conflicts of interest policy

We have in place a Conflicts of Interest and Related Party Transactions Policy which sets out our processes for identifying and managing any actual or potential conflicts of interest and related party transactions

For further information on how we manage any conflicts of interest, please refer to the Scheme's Other Material Information document which can be found on the Disclose Register at [disclose-register.companiesoffice.govt.nz](https://disclose-register.companiesoffice.govt.nz) (click 'Search for an offer' and search for 'SuperLife UK Pension Transfer Scheme').

## 7. Investment performance monitoring

---

### Performance monitoring

The investment performance (also known as returns) of the Funds is measured each working day as part of the unit pricing process and forms the basis for the performance calculations.

We measure performance for each Fund on:

- a before-fees and before-tax basis; and
- an after-fees and before-tax basis; and
- an after-fees and after-tax (at the highest PIR) basis.

We monitor and review the investment performance of the Funds monthly. The performance of each Fund is monitored over various periods and is aggregated into longer-term measures of performance, including but not limited to monthly, three-monthly, one-year, three-year and five-year. These are compared against fund objectives and a relevant market index or composite index (as applicable).



See **Appendix B** for more information on the market indices.

## 8. Investment strategy review

---

We oversee the development, implementation, monitoring and performance of the investment strategy of the Funds within the Scheme, including selecting or removing underlying fund manager(s) and underlying funds(s). As well as the selection process, all incumbent underlying fund managers, are subject to ongoing monitoring by us.

We will normally review the investment strategy for each Fund on a bi-annual basis or when market conditions warrant it. This includes a strategic asset allocation review of each Scheme Fund in order to set what we believe will be the most effective benchmark asset allocation and ranges for the Fund to achieve its long-term performance objective while remaining in-line with its risk profile.



We may also seek advice and recommendations from external investment advisers concerning the Funds and underlying funds and utilise investment research and other tools to provide recommendations on the underlying fund managers, where applicable.

## 9. SIPO compliance and review

---

We monitor the Funds and underlying funds compliance with the investment strategies and policies in this SIPO each month, with the exception of limit breaks which is monitored by us on a weekly basis.

The SIPO is formally reviewed annually.

An ad-hoc review of the SIPO may be triggered where there is a change to any of the Funds or any relevant factors impacting a Fund, including, but not limited to:

- any fundamental changes in the investment environment;
- the nature or type of investments that may be made;
- the benchmark and asset ranges of the Funds;
- a change to an underlying fund manager or underlying fund;
- a change to any of the investment objectives of a Fund/s; or
- a change to any of the investment strategy or investment policy of a Fund/s.

Reviews will take into account the legislative requirements, and the Financial Markets Authority's SIPO guidelines applicable at the time.

We can make changes to the SIPO at any time. We will consult with the Supervisor regarding any changes to the SIPO, and, in the case of changes that are considered by the Supervisor to be material, provide investors with 30 days' prior notice, unless the Supervisor agrees otherwise. Any changes to the SIPO are approved by our Board and are subject to the restrictions (if any) contained in the Trust Deed and Establishment Deeds. Any material changes will be included in the Scheme's annual report.



The **SIPO** is available on the scheme register at [disclose-register.companiesoffice.govt.nz](https://disclose-register.companiesoffice.govt.nz) (click 'search schemes' and search for 'SuperLife UK Pension Transfer Scheme').

## 10. No guarantee of investments in the Scheme

---

### **No guarantee of investments in the Scheme**

Investments in the Scheme are not deposits in Retirement Income Group Limited (**RIG**) or their subsidiaries (together RIG), nor are they liabilities of RIG. Investments are subject to investment risk, including possible delays in repayment, and loss of income and principal invested. RIG will not be liable to you for the capital value or performance of your investment.

Your investment in the Scheme is not guaranteed by RIG, the Manager, the Supervisor, any of their directors, board members, or any other person.

### **No guarantee of Fund objectives**

We do not guarantee that the objectives of each Fund will be achieved.

# Appendices

## Appendix A – Asset classes

The asset classes that our Funds and underlying funds invest in are described below:

Asset class	Description
<b>Cash and cash equivalents</b>	May include interest-bearing deposits with one or more registered banks (such as term deposits), short-term debt securities, floating rate notes. Cash equivalents may also include a portfolio of bonds with an effective duration not exceeding 6 months and a weighted average maturity of around 12 months.
<b>Fixed interest assets</b>	May include debt securities issued by governments, corporations, local authorities or banks (called issuers). The issuer generally pays a set (or fixed) interest rate for a set period of time. Cash and cash equivalents may also be included in fixed interest assets.
<b>Listed property assets</b>	Shares or units in listed property trusts or companies. Those trusts or companies own or invest directly in commercial property.
<b>Equities</b>	Investments that give the holder part-ownership of a company, corporation or similar entity, including units, shares, or other equity investments, such as some types of exchange traded futures. These investments are generally listed on a stock exchange. Equities may also be referred to as shares.
<b>Other</b> (such as alternative assets)	An asset that doesn't fit into the four main asset classes (cash and cash equivalents, fixed interest, listed property, and equities). Alternative assets can include commodities, hedge funds, private equity, infrastructure, and unlisted property funds.

The Funds and underlying funds may invest in other investments that we consider to be part of the relevant asset class.



Derivatives may be used in the underlying funds. See page 5 for more information.

## Appendix B – Market indices

The Scheme Funds gain exposure to the asset classes by investing in underlying funds. Where a Fund invests in more than one underlying fund, we will set the percentage allocation to the underlying funds.

The relevant market index for each of the Funds is either a single market index or a composite index. A composite index is calculated using the benchmark asset allocation of each multi-asset-class Fund and the relevant indices of the asset class.

The relevant market indices for each Fund are detailed in **Appendix C**. We may change the underlying funds and market indices at any time and without notice to investors, provided that the SIPO and any relevant requirements of the FMCA and FMCR are met.

More information about the market indices can be found at the index providers' websites. The links below may change from time to time.

Asset class	Market index	Where to find more information
<b>Cash and cash equivalents</b>	S&P/NZX Bank Bills 90-Day Index	<a href="https://spglobal.com/spdji/en/">spglobal.com/spdji/en/</a>
<b>New Zealand fixed interest</b>	Bloomberg NZBond Govt 0+ Yr Index	<a href="https://bloomberg.com/professional/product/indices">bloomberg.com/professional/product/indices</a>
<b>International fixed interest</b>	Bloomberg Global Aggregate Index, 100% hedged to NZD	<a href="https://bloomberg.com/professional/product/indices">bloomberg.com/professional/product/indices</a>
<b>Australasian equities</b>	Morningstar New Zealand (total return) Index, including imputation credits	<a href="https://indexes.morningstar.com/our-indices">indexes.morningstar.com/our-indices</a>
	S&P/ASX 200 Fossil Fuel Screened Total Return Index in NZD	<a href="https://spglobal.com/spdji/en/">spglobal.com/spdji/en/</a>
<b>Listed property</b>	S&P/NZX Real Estate Select Index Dow Jones Global Select ESG Tilted Real Estate Securities Index (RESI), 100% hedged to NZD	<a href="https://spglobal.com/spdji/en/">spglobal.com/spdji/en/</a>
<b>International equities</b>	MSCI World ex Australia, ESG Screened Index to NZD	<a href="https://msci.com/our-solutions/indices">msci.com/our-solutions/indices</a>
	MSCI World ex Australia, ESG Screened Index 100% hedged to NZD	
<b>Other (Listed infrastructure)</b>	Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD	<a href="https://spglobal.com/spdji/en/">spglobal.com/spdji/en/</a>

## Appendix C – Fund objectives and strategy

### NZD Conservative Fund No. 2

Establishment date	Description	Investment objective
15 October 2025	The Fund invests mainly in income assets with some exposure to growth assets. Expected to experience low to medium volatility.	Seeks to track composite indices (before annual fund charge and tax), comprising: 14% S&P/NZX Bank Bills 90-Day Index; 21% Bloomberg NZ Bond Govt 0+ Yr Index; 35% Bloomberg Global Aggregate total return Index, 100% hedged to NZD; 3.5% Morningstar New Zealand (total return) Index, including imputation credits; 1.5% S&P/ASX 200 Fossil Fuel Screened total Return Index in NZD; 22% MSCI World Ex Australia ESG Screened Index, 50% hedged to NZD; 0.75% S&P/NZX Real Estate Select Index; 0.75% Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD; 1.5% Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD.

### Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		14%	4% - 24%	S&P/NZX Bank Bills 90-Day Index
New Zealand fixed interest	Simplicity NZ Bond Fund	Simplicity NZ Limited	21%	11% - 31%	Bloomberg NZ Bond Govt 0+ Yr Index
International fixed interest	Smart Wholesale Global Government Bond Fund	Smartshares Limited	17.5%	25% - 45%	Bloomberg Global Aggregate Index, 100% hedged to NZD
	Smart Wholesale Global Credit Fund		17.5%		
Total income assets			70%		
Australasian equities	Simplicity NZ Share Fund	Simplicity NZ Limited	3.5%	0% - 15%	Morningstar New Zealand (total return) Index, including imputation credits S&P/ASX 200 Fossil Fuel Screened Total Return Index in NZD
	Smart Wholesale Australian Equity ESG Fund	Smartshares Limited	1.5%		
International equities	Smart Wholesale Global Equity ESG Fund	Smartshares Limited	11%	12% - 32%	MSCI World ex Australia ESG Screened Index, 50% hedged to NZD
	Smart Wholesale Global Equity ESG Fund Hedged		11%		
Listed property	Kernel NZ Commercial Property Fund	Kernel Wealth Limited	0.75%	0% - 11.5%	S&P/NZX Real Estate Select Index  Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD
	Kernel Global Property (NZD Hedged) Fund		0.75%		
Other (Listed infrastructure)	Kernel Global Infrastructure (NZD Hedged) Fund	Kernel Wealth Limited	1.5%	0% - 11.5%	Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD
Total growth assets			30%		
Total assets			100%		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International fixed interest** – 100% hedged to New Zealand dollars.
- **Australian equities** – unhedged.
- **International equities** – 50% hedged to New Zealand dollars. However, we may aim to add value by tactically adjusting the strategic hedging level on international shares above or below the benchmark of 50% depending on our view of how the New Zealand dollar will perform.
- **International listed property** – 100% hedged to New Zealand dollars.
- **International listed infrastructure** – 100% hedged to New Zealand dollars.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.

## NZD Balanced Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund invests primarily in growth assets with a moderate exposure to income assets. Expected to experience medium to high volatility.	Seeks to track composite indices (before annual fund charge and tax), comprising: 8% S&P/NZX Bank Bills 90-Day Index; 12% Bloomberg NZ Bond Govt 0+ Yr Index; 20% Bloomberg Global Aggregate total return Index, 100% hedged to NZD; 10% Morningstar New Zealand (total return) Index, including imputation credits; 4% S&P/ASX 200 Fossil Fuel Screened total return Index in NZD; 40% MSCI World Ex Australia ESG Screened Index, 50% hedged to NZD; 1.5% S&P/ NZX Real Estate Select Index; 1.5% Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD; 3% Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD;

## Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		8%	0% - 18%	S&P/NZX Bank Bills 90-Day Index
New Zealand fixed interest	Simplicity NZ Bond Fund	Simplicity NZ Limited	12%	2% - 22%	Bloomberg NZ Bond Govt 0+ Yr Index
International fixed interest	Smart Wholesale Global Government Bond Fund	Smartshares Limited	10%	10% - 30%	Bloomberg Global Aggregate Index, 100% hedged to NZD
	Smart Wholesale Global Credit Fund		10%		
<b>Total income assets</b>			<b>40%</b>		
Australasian equities	Simplicity NZ Share Fund	Simplicity NZ Limited	10%	4% - 24%	Morningstar New Zealand (total return) Index, including imputation credits S&P/ASX 200 Fossil Fuel Screened Total Return Index in NZD
	Smart Wholesale Australian Equity ESG Fund	Smartshares Limited	4%		
International equities	Smart Wholesale Global Equity ESG Fund	Smartshares Limited	20%	30% - 50%	MSCI World ex Australia ESG Screened Index, 50% hedged to NZD
	Smart Wholesale Global Equity ESG Fund Hedged		20%		
Listed property	Kernel NZ Commercial Property Fund	Kernel Wealth Limited	1.5%	0% - 13%	S&P/NZX Real Estate Select Index Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD
	Kernel Global Property (NZD Hedged) Fund		1.5%		
Other (Listed infrastructure)	Kernel Global Infrastructure (NZD Hedged) Fund	Kernel Wealth Limited	3%	0% - 13%	Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD
<b>Total growth assets</b>			<b>60%</b>		
<b>Total assets</b>			<b>100%</b>		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International fixed interest** – 100% hedged to New Zealand dollars.
- **Australian equities** – unhedged.
- **International equities** – 50% hedged to New Zealand dollars. However, we may aim to add value by tactically adjusting the strategic hedging level on international shares above or below the benchmark of 50% depending on our view of how the New Zealand dollar will perform.
- **International listed property** – 100% hedged to New Zealand dollars.
- **International listed infrastructure** – 100% hedged to New Zealand dollars.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.



## NZD Growth Fund No. 2

Establishment date	Description	Investment objective
15 October 2025	The Fund invests mainly in growth assets with some exposure to income assets. Expected to experience high volatility.	Seeks to track composite indices (before annual fund charge and tax), comprising: 4% S&P/NZX Bank Bills 90-Day Index; 6% Bloomberg NZ Bond Govt 0+ Yr Index; 10% Bloomberg Global Aggregate total return Index, 100% hedged to NZD; 13% Morningstar New Zealand (total return) Index, including imputation credits; 6% S&P/ASX 200 Fossil Fuel Screened total return Index in NZD; 53% MSCI World Ex Australia ESG Screened Index, 50% hedged to NZD; 2% S&P/NZX Real Estate Select Index; 2% Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD; 4% Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD.

## Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		4%	0% - 14%	S&P/NZX Bank Bills 90-Day Index
New Zealand fixed interest	Simplicity NZ Bond Fund	Simplicity NZ Limited	6%	0% - 16%	Bloomberg NZ Bond Govt 0+ Yr Index
International fixed interest	Smart Wholesale Global Government Bond Fund	Smartshares Limited	5%	0% - 20%	Bloomberg Global Aggregate Index, 100% hedged to NZD
	Smart Wholesale Global Credit Fund		5%		
Total income assets			20%		
Australasian equities	Simplicity NZ Share Fund	Simplicity NZ Limited	13%	9% - 29%	Morningstar New Zealand (total return) Index, including imputation credits S&P/ASX 200 Fossil Fuel Screened Total Return Index in NZD
	Smart Wholesale Australian Equity ESG Fund	Smartshares Limited	6%		
International equities	Smart Wholesale Global Equity ESG Fund Smart Wholesale Global Equity ESG Fund Hedged	Smartshares Limited	26.5% 26.5%	43% - 63%	MSCI World ex Australia ESG Screened Index, 50% hedged to NZD
Listed property	Kernel NZ Commercial Property Fund	Kernel Wealth Limited	2%	0% - 14%	S&P/NZX Real Estate Select Index Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD
	Kernel Global Property (NZD Hedged) Fund		2%		
Other (Listed infrastructure)	Kernel Global Infrastructure (NZD Hedged) Fund	Kernel Wealth Limited	4%	0% - 14%	Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD
Total growth assets			80%		
Total assets			100%		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International fixed interest** – 100% hedged to New Zealand dollars.
- **Australian equities** – unhedged.
- **International equities** – 50% hedged to New Zealand dollars. However, we may aim to add value by tactically adjusting the strategic hedging level on international shares above or below the benchmark of 50% depending on our view of how the New Zealand dollar will perform.
- **International listed property** – 100% hedged to New Zealand dollars.
- **International listed infrastructure** – 100% hedged to New Zealand dollars.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.

## NZD Balanced Fund No. 2

Establishment date	Description	Investment objective
15 October 2025	<p>The Fund provides investors with an exposure to a mix of growth and income assets.</p> <p>The Fund will invest 100% into the Simplicity Balanced Fund. For more information on the Simplicity Balanced Fund, please visit <a href="https://www.simplicity.kiwi">simplicity.kiwi</a>.</p>	To minimise negative returns over the medium term through investment in income assets, such as bonds, while providing an opportunity for positive real returns over the longer term by investing a reasonable proportion in growth assets such as equities and property.

### Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Benchmark asset allocation	Maximum permitted ranges
Cash and cash equivalents	10%	0% - 25%
New Zealand fixed interest	16.5%	5% - 27%
International fixed interest	14.5%	3% - 25%
<b>Total income assets</b>	<b>41%</b>	
New Zealand equities	9.25%	0% - 20%
International equities	43.5%	33.5% - 53.5%
Unlisted NZ property	6.25%	0% - 15%
<b>Total growth assets</b>	<b>59%</b>	
<b>Total assets</b>	<b>100%</b>	

## NZD Bond Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund provides exposure to New Zealand and International fixed interest by investing 100% in income assets.	Seeks to track composite indices (before annual fund charge and tax), comprising: 50% Bloomberg NZ Bond Govt 0+ Yr Index; 50% Bloomberg Global Aggregate total return Index, 100% hedged to NZD

## Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		0%	0% - 10%	
New Zealand fixed interest	Simplicity NZ Bond Fund	Simplicity NZ Limited	50%	40% - 60%	Bloomberg NZ Bond Govt 0+ Yr Index
International fixed interest	Smart Wholesale Global Government Bond Fund	Smartshares Limited	25%	40% - 60%	Bloomberg Global Aggregate Index, 100% hedged to NZD
	Smart Wholesale Global Credit Fund		25%		
Total income assets			100%		
Total assets			100%		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International fixed interest** – 100% hedged to New Zealand dollars.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.

## NZD International Equities Fund

Establishment date	Description	Investment objective
15 October 2025	<p>The Fund provides exposure to International equities by investing 100% in growth assets (International equities).</p> <p>The Fund will generally hold 70% of its investments in assets based in the United States with 30% in other developed markets (excluding Australia).</p>	Seeks to track (before annual fund charge and tax) the MSCI World Ex Australia ESG Screened Index, 50% hedged to NZD.

## Benchmark asset allocation, range, and benchmark index

The assets of the fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		0%	0% - 10%	
International equities	Smart Wholesale Global Equity ESG Fund Smart Wholesale Global Equity ESG Fund Hedged	Smartshares Limited	50% 50%	90% - 100%	MSCI World Ex Australia ESG Screened Index, 50% hedged to NZD
<b>Total growth assets</b>			<b>100%</b>		
<b>Total assets</b>			<b>100%</b>		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International equities** – 50% hedged to New Zealand dollars. However, we may aim to add value by tactically adjusting the strategic hedging level on international shares above or below the benchmark of 50% depending on our view of how the New Zealand dollar will perform.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.

## NZD Australasian Equities Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund provides exposure to Australasian equities by investing 100% in growth assets (Australasian equities).	Seeks to track composite indices (before annual fund charge and tax), comprising: 70% Morningstar New Zealand (total return) Index, including imputation credits; 30% S&P/ASX 200 Fossil Fuel Screened total return Index in NZD.

## Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		0%	0% - 10%	
Australasian equities	Simplicity NZ Share Fund	Simplicity NZ Limited	70%	60% - 80%	Morningstar New Zealand (total return) Index, including imputation credits S&P/ASX 200 Fossil Fuel Screened total return Index in NZD
	Smart Wholesale Australian Equity ESG Fund	Smartshares Limited	30%	20% - 40%	
Total growth assets			100%		
Total assets			100%		

## Currency hedging

- The allocation to the Simplicity NZ Share Fund will be denominated in NZD and will not require hedging. The allocation to the Smart Wholesale Australian Equity ESG Fund is currently unhedged.

## NZD Real Assets Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund provides exposure to real assets by investing into NZ listed property, International listed property and International listed infrastructure assets.	Seeks to track composite indices (before annual fund charge and tax), comprising: 40% S&P/ NZX Real Estate Select Index; 30% Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD; 30% Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD.

## Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		0%	0% - 10%	
Listed property	Kernel NZ Commercial Property Fund	Kernel Wealth Limited	40%	60% - 80%	S&P/NZX Real Estate Select Index
	Kernel Global Property (NZD Hedged) Fund		30%		Dow Jones Global Select ESG Tilted RESI, 100% hedged to NZD
Other (Listed infrastructure)	Kernel Global Infrastructure (NZD Hedged) Fund	Kernel Wealth Limited	30%	20% - 40%	Dow Jones Brookfield Global Infrastructure Index, 100% hedged to NZD
<b>Total growth assets</b>			<b>100%</b>		
<b>Total assets</b>			<b>100%</b>		

## Currency hedging

The following foreign currency exposure targets will apply to international assets:

- **International listed property** – 100% hedged to New Zealand dollars.
- **International listed infrastructure** – 100% hedged to New Zealand dollars.

The currency hedging is passive, meaning the investment manager of the underlying funds target the benchmark hedging level, although actual hedging may differ from this, due to cash flow and market movements.

## NZD Cash Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund invests in cash and cash equivalent investments in New Zealand. Expected to experience low volatility.	Seeks to track the S&P/NZX Bank Bills 90-Day Index (before annual fund charge and tax).

### Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		100%	100%	S&P/NZX Bank Bills 90-Day Index
Total income assets			100%		
Total assets			100%		

### Currency hedging

- No currency hedging will be required.

## NZD UK Cash Fund

Establishment date	Description	Investment objective
15 October 2025	The Fund invests in UK cash and designed to reflect the return (before tax, fees and other expenses) on the UK cash market.	Seeks to track the Sterling Overnight Index Average (SONIA) (in NZD) (before annual fund charge and tax).

### Benchmark asset allocation, range, and benchmark index

The assets of the Fund (excluding transactional cash) will be invested within the investment ranges set out below:

Asset class	Underlying fund	Underlying fund manager	Benchmark asset allocation	Maximum permitted ranges	Benchmark index
Cash and cash equivalents	Cash at Bank		100%	100%	Sterling Overnight Index Average (SONIA) (in NZD)
Total income assets			100%		
Total assets			100%		

### Currency hedging

- No currency hedging will be used.



