

12 June 2026

John Minto

Palestine Solidarity Network Aotearoa

By email: [REDACTED]

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Dear John,

**Official Information request for information relating to the Israeli lobby and policy amendments**

I refer to question four of your official information request dated 26 April 2026 (received on 28 April 2026), for which we extended the deadline until 12 June 2026. Thank you for your understanding.

Your request is for:

*Copies of all internal reports and external communications – including emails and minutes of meetings – relating to the Superfund decision to remove specific references to human rights standards from the Superfund's divestment considerations in June 2022.*

As regards the framing of your request, please note that human rights standards have remained a key part of our sustainable investment decisions regardless of the degree to which specific standards were referenced in our policies. See, for example, our research and analysis in respect of Motorola Solutions which explicitly refers to the UN Global Compact (see here:

<https://nzsuperfund.nz/public/assets/Disclosures/Official-Information-Act-Requests/OIA-2025-26/R-MS-Research-and-Analysis-July-2025.pdf>).

For the purpose of answering this question, we have interpreted 'divestment considerations' to mean the relevant parts of Guardians' Statement of Investment Policies, Standards and Procedures (SIPSP) and its (then) Responsible Investment Framework. Our searches have focused on information relating to the work we did leading up to the changes to these documents that were approved at the June 2022 Board meeting.

We note that your request captured the relevant Board papers and minutes from the June 2022 Board meeting of the Guardians of NZ Superannuation. These documents have previously been released under the Official Information Act 1982 (OIA) and are available on our website at: <https://www.nzsuperfund.nz/publications/disclosures/oia/> (see entry for 20 May 2026).

A summary of the information we have identified as falling within the scope of your request, and the decisions we have made about it, is included below, with the information we are releasing attached at **Appendix 1**.

**For your information, your request also captured certain documents which are subject to legal advice privilege. We are withholding these and have not itemised them in the table below.**

We have withheld certain information on the basis that we have good reason for doing so under section 9 of the OIA. We considered whether the public interest in favour of disclosure outweighs our reasons for withholding such information and concluded that it does not.

The core grounds we have relied upon, and a brief explanation of why they apply, are set out below.

- **Section 9(2)(a) – “protect the privacy of natural persons”:** In the interests of protecting the privacy of individuals, we have redacted the names and identifying details of individuals other than Leadership Team members. We note that: the relevant individuals are not decision-makers in respect of the relevant matter; and the names/details appear in the context of activities, advice and/or processes – i.e. the names appear in a specific context which constitutes a privacy interest. We cannot see any public interest in from, the release of this personal information. It is not required for the purposes of transparency and accountability. There is no good reason why these individuals in particular should be subjected to potential public scrutiny.
- **Section 9(2)(h) – “maintain legal professional privilege”:** It is necessary that we withhold that information to maintain legal professional privilege. Legal professional privilege is an important protection that will not be set aside except in the clearest cases. In this case, we do not consider that there is a public interest in releasing the relevant information that outweighs our interest in protecting our legal privilege.

In some instances, as explained in the table below, we have been unable to locate certain documents which were linked to, or referred to, in emails or other documents under our legacy document management system. These requests have therefore been refused under section 18(e) of the OIA because the requested documents cannot be found.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or freephone 0800 802 602.

Please note that it is our policy to proactively release our responses to official information requests where we consider the request to be a material one. Our response to your request will be published shortly at <https://www.nzsuperfund.nz/publications/disclosures/oia/>, with your personal information removed.

Yours sincerely



**Jo Townsend**  
**Chief Executive**

## PSNA OIA QUESTION 4 - SUMMARY

Page in PDF Appendix	Date	Document	Decision
1	22 July 2021	RE: [Heads-up] SIPSP RI section and RI Framework changes early 2022	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
2	23 December 2021	RI SIPSP Review Plan and Timeline (attachment to item 2)	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.  Certain information has been withheld based on section 9(2)(h) – “maintain legal professional privilege”.
6	10 February 2022	FW RI SIPSP review plan and timetable.msg	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
7	14 Mar 2022	Email: RE: SIPSP – RI Compass	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.  Certain information has been withheld based on section 9(2)(h) – “maintain legal professional privilege”.
8	1 April 2022	Email <i>Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May</i>	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
11	1 April 2022	3178298-1- Questions_to_consider_for_annual_policy_reviews.DOCX.D RF (attachment to Email <i>Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May</i> )	Released in full
12	1 April 2022	3389200-1- NZ_Super_Fund_Statement_of_Investment_Policies_Stand	Released in full

Page in PDF Appendix	Date	Document	Decision
		ards_and_Procedures_-_For_Review_(2022-04-01).DOC.DRF (attachment to Email <i>Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May</i> )	
40	1 April 2022	3389254-1-VCF_Statement_of_Investment_Policies_Standards_and_Procedures_-_For_Review_(2022-04-01).DOC.DRF (attachment to Email <i>Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May</i> )	Released in full
62	1 April 2022	3389179-1-Responsible_Investment_Framework_-_For_Review_(2022-04-01).PPT.DRF (attachment to Email <i>Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May Annual SIPSP/RI Framework and Underlying Policies Review - Confirmation due by Friday, 6 May</i> )	Released in full
85	4 April 2022	Email from Cristina Billett RE: RI Section 5 SIPSP – Long and short options	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.  Certain information has been withheld based on section 9(2)(h) – “maintain legal professional privilege”.
88	29 April 2022	Marked up copy of June 2021 Responsible Investment Framework	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
131	4 May 2022	Email to Stephen Gilmore 5.01 pm 4 May 2022 (and chain) RE: Annual SIPSP/RI Framework and Underlying Policies Review – Confirmation ready for GM final review	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.  Certain information has been withheld based on section 9(2)(h) – “maintain legal professional privilege”.

Page in PDF Appendix	Date	Document	Decision
			<p>The two attachments referenced in the email of 4 May were in the format of a link to documents housed in the Guardians' legacy information system, eDocs. Unfortunately, despite making every practicable effort to locate the versions of these documents as at 4 May, we have been unable to do so. The Guardians transitioned to a new information system in September/October 2024 and documents housed in eDocs were archived as part of this process. We have searched this archive, but the versions of the documents that are surfaced via these links are in fact the final versions; drafts as at 4/5 May were either not established at the time and were subsequently overwritten (i.e. track changes accepted/declined), or have not been preserved (as is standard practice in document management system migrations) via the archiving process. We are therefore refusing your request under section 18(e) of the OIA because the requested documents cannot be found.</p> <p>The attachment referenced in the email of 5 May has been released in full.</p>
135	5 May 2022	Email to Stephen Gilmore 4.20 pm Thursday May 5	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
140	5 May 2022	Attachment to 5 May email to Stephen Gilmore - 3398221-1-SIPSP_Review	The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.
171	12 May 2022	<p>Risk Committee Paper: Item 2: Annual Review of Respective Statements of Investment Policies, Standards and Procedures and all Policies, including linked documents:</p> <ul style="list-style-type: none"> <li>- full marked up version of the NZSF SIPSP SD#340504 (optional reading)</li> <li>- full version of the RI Framework #SD3400619</li> <li>- full marked up version of the VCF SIPSP #3389254 (optional reading)</li> </ul>	<p>The Risk Committee paper is released in full, other than:</p> <ul style="list-style-type: none"> <li>- Names of certain staff members have been withheld based on Section 9(2)(a).</li> <li>- The Risk Committee paper provided links to three documents which were housed in our legacy information system, eDocs. Unfortunately, despite making every practicable effort to locate the versions of these documents as at the date they were circulated to the Risk Committee, we have been unable to do</li> </ul>

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			<p>so. The Guardians transitioned to a new information system in September/October 2024 and documents housed in eDocs were archived as part of this process. We have searched this archive, but the versions of the documents that are now surfaced via these links are in fact the final versions. Drafts as at 13 May were either not established at the time and were subsequently overwritten (i.e. track changes accepted/declined), or have not been preserved via the archiving process. We are therefore refusing your request under section 18(e) of the OIA because the requested documents cannot be found.</p> <p>Having consulted with the staff concerned, we feel comfortable stating that the documents that were supplied to the Risk Committee were not materially different to those presented at the Board meeting on 22 June 2026. These documents have been released under the OIA and are available on our website, as noted above. We also note that the Risk Committee paper contained a table summarising changes to the SIPSP.</p>
180	11 May 2022	Extract from Risk Committee pre-meeting Q&A	<p>Names of certain staff members have been withheld based on Section 9(2)(a). Out of Scope information (i.e. does not relate to sustainable investment policy changes) has not been released.</p>
181	19 May 2022	Minutes of Risk Committee meeting of 19 May 2022	<p>Information that is out of the scope of this request (i.e. does not relate to sustainable investment policy changes) has not been released. Names of certain staff members have been withheld based on Section 9(2)(a).</p>
187	25 May 2022	Email circulating a document setting out list of changes made to the RI Framework	<p>The names and details of certain staff members are withheld based on Section 9(2)(a) – Privacy.</p>
198	25 May 2022	Attachment 1: 3408498 – 1 – Responsible Investment Framework review and updates May 2022 – List of Changes	<p>Released in full</p>