

Investment Risk Allocation Policy

Document Owner:

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Subject Matter Contributors:

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Document History:

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1.0	1 July 2011		Board	Final
Note this version supersedes all earlier draft versions (#149989)				
1E	6 Dec 2011	Volatility Strategy Introduction	Board	Final
2&2A	Nov 2012	Annual Policy Review	Board & CEO	Final
2B	July 2013	Governance and Operation of LRS	Board	Final
2C	13 Sept 2013	Replace reasonable scenario references	Board	Final
2D	14 Feb 2014	Changes to Responsibilities Schedules	Board	Final
3	May 2014	Risk Budget Introduction and 2 yearly Policy Review	Board	Final
4	10 Aug 2015	Changes to the reference portfolio, proxy system, constraints and reporting framework.	Board & CEO	Final
5	1 Dec 2015	Update to Schedule 6A (Proxy System) to improve clarity.	Board	Final
6	26 Jan 2016	Update to Schedules 6A and 7	Board	Final
7	14 Apr 2016	Two yearly Policy Review	Board	Final
8	27 Jul 2016	Updated to reflect changes in the Responsible Investment Framework, the introduction of the concept of Portfolio Flexibility, and changes due to the Liquidity Replenishment Review.	Board	Final
8A	8 Dec 2016	Update to Schedule 9 (Legislative Compliance)	CEO	Final
8B	24 Jan 2017	Update to Schedule 5 (Value Adding Strategies & Opportunities).	CEO	Final

9	24 Nov 2017	Update Schedule 6A (Proxy System)	Board	Final
10	19 Jun 2018	Two Yearly Policy Review	Board & CEO	Final
10A	28 Jun 2018	Update to Schedule 10B to reflect changes in New Investments Group processes	CEO	Final
11	17 Oct 2018	Update to Schedule 1A (Responsibilities)	CEO	Final
12	26 Feb 2019	Update to Schedule 7 (Constraints)	Board	Final
12A	19 Jul 2019	Updates to Schedule 5, 6A and 10B	CEO	Final
13	6 Aug 2019	Update to Schedule 6A (Proxy System)	Board	Final
13A	07 Jan 2020	Update to Schedule 4 (Processes for Opportunity Evaluation, Risk Allocation and Fund-wide Liquidity Management)	CEO	Final
13B	09 Jan 2020	Update to Schedule 5 (Value Adding Strategies & Opportunities)	CEO	Final
13C	13 Mar 2020	Update to Schedule 1A (Responsibilities), Schedule 5 (Value Adding Strategies & Opportunities), and Schedule 6A (Proxy System).	CEO	Final
14	26 Nov 2020	Two Yearly Policy Review	Board & CEO	Final
15	18 Feb 2021	Removal of Variance Swaps opportunity.	Board & CEO	Final
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17	24 Jun 2021	Update to Background and Schedule 8 (Reporting Framework)	Board	Final
17A	21 Jul 2021	Update to Schedule 5 (Value Adding Strategies & Opportunities)	CEO	Final
18	5 Aug 2021	Update to Schedule 6A (Proxy System)	Board	Final
19	23 Nov 2021	Update to Schedule 7 (Constraints)	Board	Final
20	24 Feb 2022	Update to Schedule 6A (Proxy System) and Schedule 5 (Value Adding Strategies & Opportunities)	Board & CEO	Final
21	22 Jun 2022 (Board), 6 Sep 2022 (CEO)	Update to Schedule 1 (Responsibilities), Schedule 4, Schedule 5 (Value Adding Strategies and Opportunities), Schedule 6A (Proxy System), Schedule 8 (Reporting), Schedule 10A (Risk Budget)	Board & CEO	Final

22	3 Aug 2022	Update to section 11 to reflect new vision statement and to Schedule 8 (Reporting Framework) to reflect role title change GM Finance & Investment Operations to GM Strategy & Shared Services	Board	Final
23	30 September 2022	Update to Schedule 2 to reflect the Reference Portfolio benchmark changes	Board	Final
24	30 November 2022	Update to Schedule 6A (Proxy System)	Board	Final
25	19 July 2023	Update to Schedule 5 to delete two Opportunities (with consequential change to Schedule 6A)	CEO	Final
26	20 August 2023	Update to Schedule 5 to add Trend and delete Volatility Risk Premium	CEO	Final
27	8 October 2023	Update to Schedule 5 to change four Opportunity names and remove on Opportunity	CEO	Final
28	6 March 2023	Updated to Schedule 10B	CEO	Final
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31	8 May 2024	Update to Schedule 5 to reflect removal of Life Settlements Opportunity	CEO	Final
32	22 August 2024	Update to Schedule 6A to reflect changes in opportunities	Board	Final
33	26 September 2024	Update to Schedules 5 and 6A to reflect change in opportunities	CEO	Final

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Background

- 1.1. This Policy relates to the New Zealand Superannuation Fund (the "Fund").
- 1.2. We have an investment belief that 'asset allocation is the key investment decision'. Undertaking it effectively is a key part of maximising return over the long term, without undue risk.
- 1.3. Asset allocation and investment risk allocation are synonymous terms.
- 1.4. The allocation starts with the establishment of a Reference Portfolio. We then implement agreed Value Adding Strategies that introduce new permitted risk exposures into the portfolio. The final portfolio is called the Actual Portfolio.
- 1.5. In the Actual Portfolio of the Fund we seek to add value to the Reference Portfolio:
 - through accessing return premia (whether market or skill based) not available in the Reference Portfolio (Active Returns) and
 - by gaining access to the desired risk exposures, rebalancing the Fund, and managing liquidity risk in the most cost effective manner possible (Portfolio Completion).
- 1.6. In building the Actual Portfolio we identify a number of investment opportunities within each of these Value Adding Strategies, and employ a Risk Budgeting Process to
 - determine the relative attractiveness of the **Opportunities** and,
 - given that relative attractiveness and the total amount of investment risk we wish to take, how much active risk to allocate to each Opportunity.

Objective

- 2.1 To implement effective controls and frameworks to ensure that how we allocate investment risk is managed effectively and in compliance with our governance and legislative requirements.

Definitions

- 3.1 To aid with interpretation of this policy we have a Glossary of Terms, which defines all investment and technical terms used in our policy documents. Terms that appear in the Glossary will be **bolded** the first time they appear in this policy. References to other documents are italicised.

Scope

- 4.1 This policy covers the approved Reference Portfolio, Value Adding Strategies and Proxies. It also covers the Investment Constraints that need to be adhered to when implementing the Actual Portfolio.
- 4.2 This policy should be read in conjunction with three other investment policies. These are:

Direct and Externally Managed Investment Policy: sets out the principles we follow when making investments to capture active returns carried out by the Direct and External

Investments and Partnership Teams whether those investments are made directly through or alongside manager or via collective investment vehicles.

- *Portfolio Completion & Internally Managed Securities Policy*: covers all Financial Market Transactions, rebalancing, currency hedging, liquidity management, and counterparty approval and management.
- *Derivatives Policy*: covers controls and frameworks that ensure all aspects of derivative use (both internal and externally managed) are effectively managed and in compliance with our investment, governance and legislative requirements.

Delegations and Authorities

- 5.1 The *Delegations Policy* governs the delegations and authorities that apply in all policy documents. In the event of any discrepancy between this policy and the *Delegations Policy* the *Delegations Policy* will prevail.
- 5.2 The Board has reserved certain matters either to itself, a committee of the Board or the Chief Executive. Those matters are outlined in Schedule 1 of the *Delegations Policy*.
All other matters are delegated to the Chief Executive who may sub-delegate them to Guardians' staff. All delegates and sub-delegates must exercise their authorities in compliance with the general conditions of delegation and sub-delegation set out in Schedule 2 of the *Delegations Policy*.
- 5.3 There are certain responsibilities inherent under this policy. Those responsibilities, and the person responsible for them, are outlined in Schedule 1.

Asset Classes & Benchmarks

We believe it is important to increase the Fund's efficiency (either by higher returns for the same risk or the same returns for less risk) by diversifying the Fund across and within various asset classes.

The Fund comprises a broadly diversified portfolio of assets. The differing characteristics of various asset classes provide diversification benefits when they are aggregated into a total portfolio.

Asset class decisions are a key determinant of the Fund's risk and total return. As a result decisions on asset classes to invest in and allocations require Board oversight.

- 6.1 All asset classes that are eligible for consideration in the Reference Portfolio and their related performance benchmarks must be approved by the Board.
- 6.2 A list of approved Reference Portfolio asset classes and benchmarks must be maintained in Schedule 2.
- 6.3 Benchmarks for investments that seek to add value to the Reference Portfolio must be maintained in Schedule 2.

Reference Portfolio

The starting point for our risk allocation decisions is the Reference Portfolio. The Reference Portfolio represents a diverse set of asset classes that best meets our statutory obligations on a passive basis given an assumption that asset prices are at equilibrium. These obligations include maximising return without undue risk to the Fund as a whole.

The construction principles of the Reference Portfolio suggest that the Reference Portfolio:

- be a simple and low cost portfolio that could be implemented passively; this will not include private market or illiquid asset classes;
- be diversified: this will include at least equities and fixed interest (and potentially others including listed property, listed infrastructure, commodities and foreign currency exposure);
- reflect an appropriate risk profile for the Fund, given its purpose;
- be relevant to a New Zealand based investor;
- be an equilibrium construct; it is in the Actual Portfolio that we exercise judgements about asset prices (or risk premiums) diverging from equilibrium (i.e. as investment opportunities come and go). The Reference Portfolio holds us to account for these judgements.

In constructing the Reference Portfolio performance benchmark we need to take into account our tax status and any changes in that status need to be reflected in the benchmark construction.

7.1 We will establish a Reference Portfolio that represents the lowest cost implementation of our obligation to maximise returns without undue risk.

7.1.1 The reference portfolio will comprise readily obtainable asset exposures.

7.2 The performance benchmark of the Reference Portfolio will be the weighted average return of benchmarks for constituent asset classes.

7.3 The Reference Portfolio must be approved by the Board.

7.4 The approved Reference Portfolio must be maintained in Schedule 3.

Value Adding Strategies and Opportunities

The actual composition of the Fund at any one time is called the Actual Portfolio. The purpose of the Actual Portfolio is to represent the best portfolio possible at any point in time, reflecting the Fund's purpose and endowments, as well as our investment beliefs and organisational capability.

The Actual Portfolio exposures will deviate from the Reference Portfolio as a result of our value adding activities. This is underpinned by our recognition that investment opportunities come and go and, to benefit from this fluctuation, the Actual Portfolio must be more dynamic. These investment strategies are the key method for us to add value to the Fund and therefore require Board oversight.

We follow a Risk Budgeting Process to ensure that the attractiveness of all Opportunities is assessed on a consistent basis and that the active risk of the Actual Portfolio will meet approved risk budgets, on average over time. The total active risk budget is set by the Board.

We also have liquidity risk management processes that ensure we maintain sufficient liquidity to withstand a range of stress events: Portfolio Flexibility analysis seeks to ensure that we are not over invested in illiquid assets, and the Liquidity Management Framework seeks to ensure we maintain sufficient liquidity to meet the fund's day to day payment obligations while minimising the direct and indirect costs of holding liquidity. The Liquidity Management Framework is governed by the *Portfolio Completion and Internally Managed Securities Policy*.

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- 8.1 For Value Adding Strategies and Opportunities we will maintain and adhere to opportunity evaluation, risk allocation and fund-wide liquidity management frameworks.
- 8.2 An outline of the frameworks for opportunity evaluation, risk budgeting and fund-wide liquidity management must be maintained in Schedule 4.
- 8.3 A list of approved Value Adding Strategies and approved Opportunities must be maintained in Schedule 5.
- 8.3.1 The authority for approving Value Adding Strategies and Opportunities is set out in the *Delegations Policy*.
- 8.4 The total active risk budget must be maintained in Schedule 10.

Proxies

The proxy system is normally used when we make investments not represented in the Reference Portfolio. The system ensures that the Fund's risk is maintained at its target level when these investments are introduced to the Fund portfolio.

Such investments, made under one of our Board-approved Value Adding Strategies, generally have embedded market risk exposures. The proxy system tries to offset these embedded risks by selling down a mix of public market growth and fixed interest assets represented in the Reference Portfolio.

- 9.1 Allocations to asset classes not represented in the Reference Portfolio must be in accordance with a Board approved Value Adding Strategy. The Reference Portfolio assets that the new allocation replaces will be determined by the proxy system.
- 9.1.1 The authority for deciding the proxy system is set out in the *Delegations Policy*.
- 9.2 For some investments the application of the standard proxy system does not best maintain the overall risk of the Fund. In this case the combination of Reference Portfolio assets that best keeps the overall risk of the Fund constant is applied.
- 9.2.1 The authority for departing from the standard proxy system is set out in the *Delegations Policy*.
- 9.3 The proxy system must be maintained in Schedule 6A.

Investment Constraints

We are not prevented from investing in any particular asset or class of assets. Exclusions and constraints are therefore imposed by our policy and can be categorised in four general areas:

- a) capital or risk constraints that limit the deviation of the Actual Portfolio from the Reference Portfolio;
- b) capital or risk constraints that limit the exposure to a single manager, asset and/or strategy to avoid undue concentration;
- c) investments that are excluded by virtue of our Responsible Investment Framework; and
- d) constraints within individual investment mandates.

- 10.1 Capital and risk constraints must be maintained to manage investment risk within the Fund.

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- 10.2 All capital and risk constraints must be detailed in Schedule 7. These constraints must not be exceeded without Board approval.
- 10.3 We will use best endeavours to ensure that the Fund does not control any other entity or hold a percentage of the voting rights in any other entity that would require it to seek control of the entity (other than an entity that is a Fund investment vehicle, as per Section 59 of the Act).
- 10.3.1 If the Fund does end up controlling an entity, we will take all reasonable steps to remedy the situation as soon as practicable.
- 10.4 No investment will be made in any security issued by a company excluded by the Guardians under the *Responsible Investment Framework* (which is referred to in the *Statement of Investment Policies, Standards & Procedures*). Securities held at the time of the decision will be divested from the Fund's segregated mandates. We endeavour to apply exclusions to Collective Investment Vehicles (CIVs), to the extent this is feasible and commercially prudent. CIVs are evaluated on a case-by-case basis. The potential for indirect exposure to excluded securities through CIVs is factored into the selection of access points.
- 10.5 Liquidity constraints must be maintained in Schedule 7.

Review

The Reference Portfolio is an 'equilibrium' concept. This means that it is structured based on our assumptions of what the equilibrium risk and returns of various asset classes should be, regardless of what is actually happening to those values in any given market conditions. Therefore the Reference Portfolio's composition is only likely to change if:

- our risk tolerance changes; or
- our assumptions, about what long-term equilibrium return-for-risk should be, change; or
- aspects of the Fund's purpose or endowments change; or
- market developments mean that a narrower or wider set of representative market exposures can be obtained passively and at low-cost.

The performance differences between the Reference Portfolio and the Actual Portfolio represent the active risk (and return) due to our value-add activities. Risk budgets establish the targeted active risk on-average through time and are formally reviewed on a periodic basis to ensure they remain consistent with the Board's risk appetite.

Opportunities are monitored on an ongoing basis to assess whether objectives are being met in line with expectations and to ensure we continue to have the necessary organisational capability. Formal and periodic reviews are also important to assess whether an investment remains consistent with our purpose and continues to be the optimal use of our resources.

- 11.1 We will review the Reference Portfolio asset class composition and benchmarks immediately if the Fund's purpose changes, or otherwise at least every 5 years.
- 11.2 We will review the cost of running the Reference Portfolio at least every 5 years.
- 11.3 We will review the asset class equilibrium risk and return assumptions used in the Reference Portfolio and risk budgeting processes at least every 5 years.
- 11.4 We will periodically review individual Value Adding Strategies, Opportunities or, where appropriate, investments. The Investment Committee will determine the timing

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of, and terms of reference for, each review based on its evaluation of which aspects of the Fund's investment programme need particular focus.

- 11.5 We will review the proxy system at least every 5 years.
- 11.6 We will review investment constraints at least every 5 years.
- 11.7 We will review the total active risk budget at least every 5 years.
- 11.8 We will review the Portfolio Flexibility Framework at least every 5 years.
- 11.9 We will review the Fund's tax profile as it pertains to the performance calculation of the Reference Portfolio at least every five years.

Reporting

- 12.1 We must report to the Board on the following matters:
 - Performance of the Reference Portfolio;
 - Deviation from the standard proxy system;
 - Performance of Value Adding Strategies;
 - Performance of Portfolio Completion activities;
 - Performance of the Actual Portfolio;
 - Compliance with the capital and risk constraints; and
 - Active risk used.
- 12.2 We will report proposed material changes to the following schedules to the Board for their approval:
 - Schedule 2: Asset Classes and Benchmarks
 - Schedule 3: Reference Portfolio
 - Schedule 5: Value Adding Strategies and Opportunities (for changes to strategies)
 - Schedule 6A: Proxy System
 - Schedule 7: Constraints
 - Schedule 8: Reporting Framework
 - Schedule 10A: Risk Budget
- 12.3 We must report to the Board, for their information, material changes to the following schedules of this policy.
 - Schedule 1: Responsibilities
 - Schedule 4: Processes for Opportunity Evaluation, Risk Allocation and Fund-wide Liquidity Management
 - Schedule 5: Value Adding Strategies and Opportunities (for changes to opportunities)
 - Schedule 6B: Proxy System Description
 - Schedule 9: Legislative Compliance
 - Schedule 10B: Investments requiring Investment Committee Endorsement
- 12.4 An outline of the current reporting framework, including any reporting to internal management committees, must be maintained in Schedule 8.

Legislative Compliance

We have a legislative compliance framework to ensure that we comply with our legislative obligations. In each of our policies we list specific legislation that might impact on the activities covered by that policy.

- 13.1 We will ensure that all our activities under this policy comply with our legislative obligations and give effect to our legislative compliance framework.**
- 13.2 A list of legislation that potentially impacts on the activities under this policy, together with a brief description of how the legislation relates to the activity, must be maintained in Schedule 9.**

Control Section

Approved this 24 September 2013 as amended 19 June 2014, 14 April 2016, 19 June 2018, 26 November 2020 24 June 2021, 22 June 2022, 3 August 2022, and 22 February 2024

**Chief Investment
Officer**

Chief Executive Officer

Board Chairperson

Schedule 1: Responsibilities

Chief Investment Officer will:	<ul style="list-style-type: none"> • ensure this policy is kept current and relevant to the activities being undertaken (including Schedules 1-10) • ensure this policy is reviewed by the Risk Committee and Board at least every five years • report breaches of liquidity constraints contained in Schedule 7 to the Board along with details of planned actions • ensure the Investment Committee each year reviews investment activity by Opportunity and portfolio completion, and reviews access point teams including team strategy and resourcing; these reviews are provided to the Board
Head of Asset Allocation will:	<ul style="list-style-type: none"> • review the Reference Portfolio at least every 5 years and report to the IC and Board • review the cost of running the Reference Portfolio at least every five years and report to the IC and Board • review the total active risk budget at least every 5 years and report to the IC and Board • review risk budgets at least every 5 years and report to the IC and Board • review the proxy system at least every 5 years and report to the IC and Board • ensure that, every six months, Asset Allocation provide a list of non-standard proxies approved during the prior six-month period to the Investment Committee and the Board • review investment constraints at least every 5 years and report to the IC and Board • review the portfolio flexibility framework at least every 5 years and report to the IC and Board • report portfolio flexibility to the Investment Committee and Board in accordance with Schedule 8 of this policy •
Head of Risk will:	<ul style="list-style-type: none"> • report performance of the Reference Portfolio, Value Adding Strategies and the actual portfolio monthly to the Investment Committee and Board • report compliance with investment constraints contained in Schedule 7 to each regular Investment Committee and Board meeting • report material policy breaches notified through the Learning Opportunities reporting process immediately to the Risk Committee and Board • report all policy breaches notified through the Learning Opportunities reporting process to the subsequent Audit & Risk Committee meeting
General Counsel will:	<ul style="list-style-type: none"> • ensure Schedule 9 (legislative compliance) is kept current • report material changes to the schedules of this policy as part of the annual SIPSP review to the Risk Committee and Board meetings (the no surprises protocol also applies)
Head of Tax	<ul style="list-style-type: none"> • review the impact of changes to the Fund's tax profile on the calculation of the Reference Portfolio benchmark at least every five years (must consult with the Head of Asset Allocation as part of this process)

Responsibilities approved by Chief Executive on 12 February 2013 as amended 19 June 2014, 14 April 2016, 27 July 2016, 19 June 2018, 17 October 2018, 13 March 2020, 2 December 2020, and 6 September 2022

Schedule 2: Asset Classes and Benchmarks**Table 1: Reference Portfolio Asset Classes and Benchmarks**

Reference Portfolio Asset class	Benchmark	Sub-categories	Asset class definition
Global equities	MSCI World Climate Paris Aligned Index hedged to NZD; MSCI Emerging Market Climate Paris Aligned Index hedged to NZD	Large/mid capitalisation equities	Equity securities listed, or shortly to be listed, on any recognised stock exchange in developed and emerging markets.
New Zealand equities	NZX 50 Customised Low-Carbon Index* ⁷	Incorporating Australian equities (recognising the close economic relationship with Australia)	Equity securities listed, or shortly to be listed, on the New Zealand or Australian Stock Exchanges, or listed on other recognised exchanges and for which New Zealand is their primary source of business.
Fixed Interest	Bloomberg Barclays Global Aggregate Index hedged to NZD	Sovereign, investment grade, high yield, emerging market, mortgages and inflation-linked; and in broad exposure terms, can be sub-categorised into treasury and ex-treasury.	Debt instruments including deposits, debentures, debenture stocks, bonds, notes, promissory notes, loans and other non-equity securities that are not convertible into equity at the option of the issuer.

Table 2: Benchmarks for Value-Adding Activities

Type of investment	Definition	Benchmark
Proxied Investments	As set out in the proxy table in Schedule 6A	The proxy as per Schedule 6A and Schedule 6B
Investments that are not proxied	As described in Schedule 6A and excluded from the proxy table	Benchmark as set out in the relevant investment management agreement or internal investment mandate
Portfolio Completion	Activities under the Portfolio Completion strategy	Benchmark as set out in the relevant investment management agreement or internal investment mandate

Approved by the Board on 13 June 2011 as amended 19 June 2014, 21 April 2015, 14 April 2016, 19 June 2018, 26 November 2020 and 30 September 2022

Schedule 3: Reference Portfolio

Asset Class	Weighting
Global equities	75%
New Zealand equities	5%
Total Growth	80%
Total Fixed Interest	20%
Total Portfolio	100%
Net unhedged Foreign Currency Exposure	0%

Approved by the Board on 21 April 2015 and 26 November 2020

Schedule 4: Processes for Opportunity Evaluation, Risk Budgeting and Fund-wide Liquidity Management

Opportunity Evaluation

For all Opportunities we undertake analysis of how much the Opportunity could improve the Fund's portfolio. The analysis considers:

- Why we should invest in the Opportunity, including:
 - What is the Opportunity?
 - What are the relevant beliefs/endowments?
 - What is the economic rationale for this Opportunity?
 - How will the Opportunity improve the efficiency of the portfolio?
 - Expected risk and return metrics
 - Comparable asset – does it fill a gap?
 - Is it consistent with our *Statement of Investment Policies, Standards and Procedures*?
- Risks, including:
 - Key risks such as investment, SI, operational and reputation
 - Regulatory requirements related to the Opportunity
- How we can access the exposure, including:
 - Considering access points (public markets; passive; direct; co-investments, CIVs; separate accounts) and our Targeting Operating Model (TOM)

New Opportunities are identified, assessed and prioritised for research by the New and Existing Opportunities (NEO) group, which is made up of the Fund's Senior Investment Strategists across all the Fund's access point teams and from Asset Allocation. Opportunities are approved in accordance with the *Delegations Policy*.

If the Opportunity is approved, the investment professional will further consider our preferred access points or managers. The diagram over the page outlines the steps to be followed.

The policy that applies will depend on the preferred access point:

- If access is direct or through an external manager or a Collective Investment Vehicle, it will be covered by the *Direct and Externally Managed Investments Policy*.

If Internally managed and resulting in a Financial Markets Transaction, it will be covered by the *Portfolio Completion & Internally Managed Securities Policy*

Access points are approved in accordance with the *Delegations Policy*. The thresholds that require these investments to be considered by the Investment Committee prior to implementation are set out in Schedule 10B.

The Investment Committee will review investment activity by Opportunity and portfolio completion each year. Separate team reviews will cover team strategy and resourcing. In addition, the Investment Committee may seek 'one-off' reviews of Strategies, Opportunities or mandates where there has been some material change in internal staff managing the exposure, material differences between expected and actual outcomes are anticipated, material changes in risk budget allocated to an Opportunity or significant observations from an Investment Screen warrant a review. The main objectives of the periodic reviews are to:

- assess whether realised risks and benefits were consistent with expected risks and benefits of a specific investment;

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- provide quality, transparent reporting to the Board;
- where appropriate, build independent (internal and third party) peer review into our Investment process;
- systematically capture lessons learned that might add value to future investments; and
- embed a strong risk management culture across the Fund.

Each completed review will be submitted to the Board following review by the Investment Committee and other management committees (if the review is so directed).

Risk Budgeting Process

The Risk Budgeting Process is the process by which risk capital is allocated to the Fund's Opportunities. This is outlined below.

Risk budgeting

Each Opportunity is assigned an active risk budget that in aggregate results in the total active risk budget set out in Schedule 10A of this policy (provided this is consistent with the Fund's liquidity risk appetite).

Risk budgets are approved in accordance with the *Delegations Policy*. Except for the Portfolio Completion strategy, the relative budget size reflects the confidence and risk-adjusted expected returns for different Opportunities, subject to liquidity, capacity, concentration and any other relevant constraint. Other metrics such as alignment with our endowments and investment beliefs will also have a bearing. The Portfolio Completion strategy is assigned an amount of active risk that will allow the rebalancing of the Fund to operate under the constraints set by the Board.

Allocation Approaches

Select groups of Opportunities have time-varying target risk allocation approaches. A Risk Target Team is assigned to each group, who are responsible for designing the allocation approach that is expected to result in the active risk budget for an Opportunity being fully utilised on average over the long term.

The Risk Target Teams monitor attractiveness signals for each of the opportunities and recommend the dialling of exposure up and down in accordance with the allocation approach. The attractiveness signals are produced on a regular basis by investment professionals, in conjunction with the Risk Target Teams.

Other Opportunities either have no time varying allocation approaches, or have mandate level allocation approaches that are managed by the internal mandate teams.

The diagram over the page sets out the governance of risk budgeting and the allocation approaches.

Fund-wide Liquidity Management

Fund-wide liquidity risk management is comprised of two functions:

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- 1) Portfolio flexibility. Do we have enough liquidity for where we are in the market cycle? How much liquidity risk should we take on average? Are illiquid assets earning sufficient returns?
- 2) Liquidity management. Can we maintain our minimum liquidity requirements if markets fall? How quickly can we raise liquidity? Are we properly accounting for the liquidity of portfolio assets?

We have a separate function and processes for portfolio flexibility because when we seek to add value to the Reference Portfolio, we need to ensure that we do not over-invest, increasing the risk of being a forced seller to an unacceptable level, i.e. that we do not undermine our endowments.

Our choices in a crisis event where we do not have a sufficiently flexible portfolio are:

- suspend tilting; and/or
- no longer currency hedge foreign assets; and/or
- conduct fire-sales of illiquid assets.

Each of these options:

- will likely involve locking in large losses;
- will likely involve the foregoing of the heightened extra expected returns that those positions would have at the time of sale, given the depressed prices;
- negates our defined-liquidity and long-horizon endowments;
- undercuts the rationale for engaging in these activities in the first place, namely that over time we earn a risk premium because we are not forced to sell.

Ensuring portfolio flexibility is strongly related to the decision making around our Risk Budgeting Process, and is governed by the Investment Committee with reporting to the Board, is important.

The table two-pages-over sets out the governance of portfolio flexibility as well as that for liquidity management.

Diagram: Governance and Processes of new Opportunity Evaluation and Risk Allocation

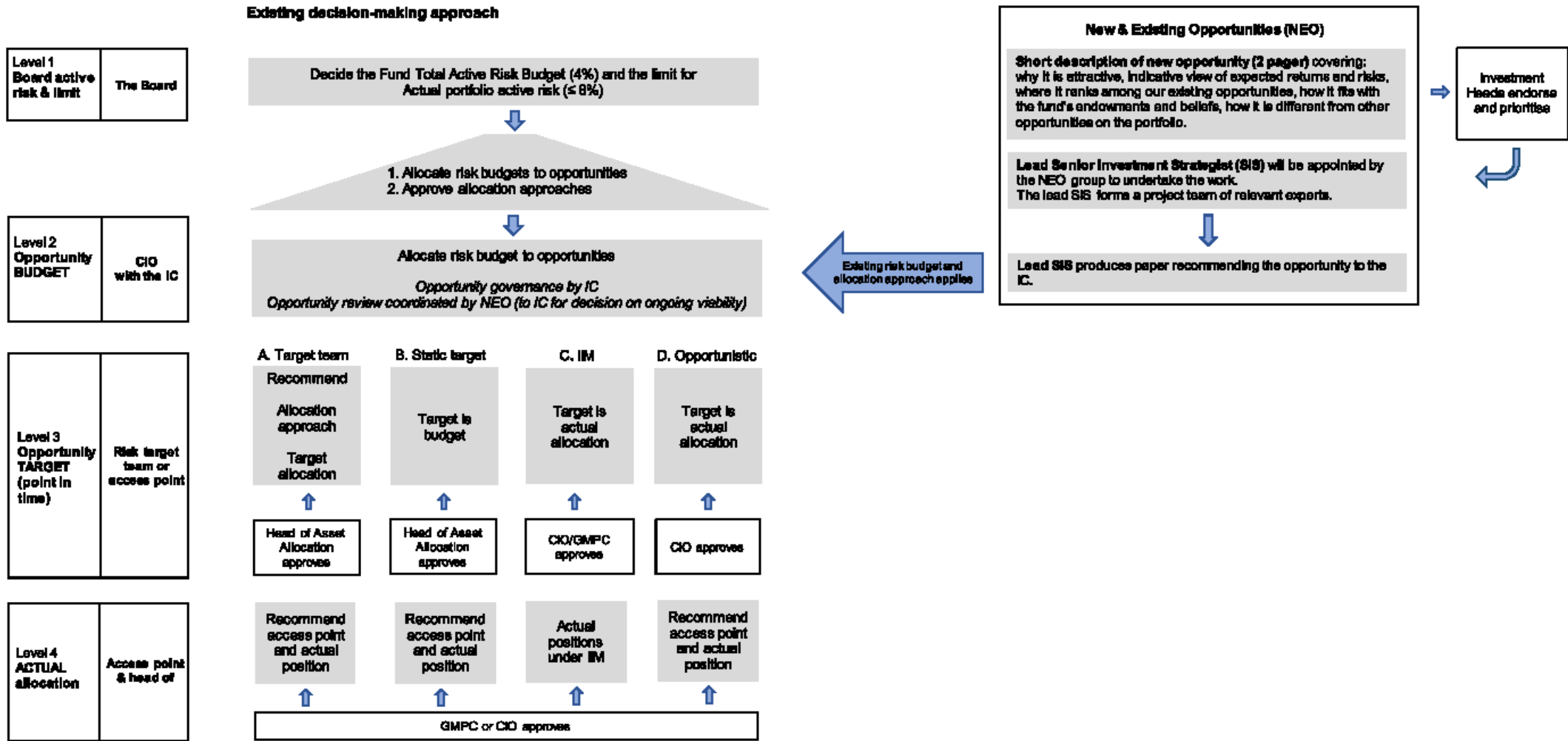


Table: Governance of portfolio flexibility and liquidity management

	Portfolio flexibility		Liquidity management (0-6 months, whole of fund)
	Normal times	Crisis	
Key questions	<ul style="list-style-type: none"> • Do we have enough liquidity for where we are in the market cycle? • How much liquidity risk should we take on average? • Are illiquid asset earning sufficient returns? 	<ul style="list-style-type: none"> • Can we sustain our overlays? • What should we sell? 	<ul style="list-style-type: none"> • Can we maintain our minimum liquidity levels if markets fall? • Can we meet forecast funding demands? • Is the liquidity model properly accounting for liquidity of portfolio assets? • How quickly could we raise liquidity?
Tools	<ul style="list-style-type: none"> • PRISM (a simulation model) • Hurdle framework • 	<ul style="list-style-type: none"> • Liquidity Waterfall 	<ul style="list-style-type: none"> • Liquidity Model
Management reporting	<ul style="list-style-type: none"> • Portfolio flexibility dashboard • Investment environment reports 	<ul style="list-style-type: none"> • Liquidity Waterfall 	<ul style="list-style-type: none"> • Liquidity dashboard • Stress-testing/scenario results
Main tasks	<ul style="list-style-type: none"> • Ensure liquidity averages 4.5 EMV over cycle • Ensure we have a liquidity crisis plan • Embed behaviours 	<ul style="list-style-type: none"> • Crisis decision making 	<ul style="list-style-type: none"> • Liquidity monitoring • Stress-tests • Modelling of nearly liquid (6 month) piece of waterfall • Liquidity management (profile vs funding demands)
Governance Responsibility	Investment Committee	Investment Committee	Portfolio Completion team manage nearly liquid assets with oversight by the Funding and Treasury Group and IC.
Model maintained and dashboard prepared by	Asset Allocation	Asset Allocation	Portfolio Completion and Portfolio Risk teams
Policy	Investment Risk Allocation Policy (this policy)	Investment Risk Allocation Policy	<i>Portfolio Completion & Internally Managed Securities Policy</i>

Approved by the Chief Executive on 12 February 2013 as amended 19 June 2014, 14 April 2016, 27 July 2016, 19 June 2018, 19 July 2019, 2 December 2020, 6 September 2022, and 1 March 2024

Schedule 5: Value Adding Strategies & Opportunities

Value adding strategies	Opportunities	Governing Policies
Active returns	<ul style="list-style-type: none"> • Strategic Tilting • Tactical Credit Opportunity • Global Macro • Convertible Arbitrage • Active Equities (NZ) • Direct Arbitrage • Opportunistic (NZ and international) • Real Estate (Core) • Real Estate (Opportunistic) • Real Estate (Value Add) • Rural Land • Buyout • Timber • Infrastructure (Core) • Infrastructure (Value-Add) • Natural Catastrophe Reinsurance • DM Equity MultiFactor • Event Driven Opportunity • Insurance Runoff • Trend • Spectrum • Venture Capital • Infrastructure (Development) • Sustainable Transition • Growth Equity • Exploratory Opportunity 	<ul style="list-style-type: none"> • <i>Investment Risk Allocation Policy</i> • <i>Direct and Externally Managed Investments Policy</i> • <i>Portfolio Completion & Internally Managed Securities Policy</i> • <i>Derivatives Policy</i>
Portfolio Completion		<ul style="list-style-type: none"> • <i>Investment Risk Allocation Policy</i> • <i>Portfolio Completion & Internally Managed Securities Policy</i> • <i>Derivatives Policy</i>

Strategies approved by the Board on 11 April 2011

Approved by the Chief Executive on 13 June 2011 as amended 14 August 2012, 4 March 2013, 23 June 2013, 22 August 2013, 10 August 2015, 14 April 2016, 24 January 2017 and 19 June 2018, with Variance Swaps approved by the Board 6 December 2011. Amended 19/07/2019, 09/01/2020, 03/03/2020, 26/11/2020, 11 January 2021, 15 April 2021, 21 July 2021, 24 February 2022, 22 June 2022, 19 July 2023, 1 March 2024 and 8 May 2024.

Schedule 6A: Proxy System

The proxies are as follows:

Proxy Category	Growth Weight* (at 10% Increments only)	Income Weight (at 10% Increments only)	Current Opportunities ^{A†}
High Growth			
Medium Growth			
Low Growth			
Income			
Non-standard			

* This percentage applies to the total of developed market, emerging market and NZ equities, with the same proportional composition as the Reference Portfolio weights for these asset classes.

^A Excludes:

- i. active asset class mandates, as these are active management of reference portfolio assets, e.g. Active Equities (NZ);
- ii. unproxied opportunities, e.g. Tactical Credit Opportunity, Direct Arbitrage, Strategic Tilting, Event Driven Opportunity, Trend

[†] Opportunities are approved by the Chief Investment Officer.

Approved by the Board on 1 December 2015 as amended 14 April 2016, 24 November 2017, 19 June 2018, 28 November 2018, 26 November 2020, 18 February 2021, 14 April 2021, 5 August 2021, 24 February 2022, 22 June 2022, 30 November 2022 and 22 August 2024

Schedule 6B: Proxy System Description

The process for setting a proxy for an investment will depend on whether a standard or non-standard proxy is appropriate:

- 1) A standard proxy is chosen from the range of growth-income combinations set out in Schedule 6A for the Opportunity in question. The choice of the growth-income asset mix within the specified range in a proxy category will depend on the risk characteristics of the Opportunity under consideration. In addition, the risk characteristics of assets under the same Opportunity may also differ due to differences in the level of leverage and idiosyncratic risk. However, the specified range of growth-income asset mix for each proxy category should be sufficient to cover most of the Fund's investments in Opportunities belonging to that proxy category. A proxy that deviates from the Opportunity proxy category set out in Schedule 6A purely due to leverage is still considered a standard proxy.
- 2) A non-standard proxy is one that does not use the standard combination of growth and income as defined in Schedule 6A. This may be because:
 - an Opportunity has time-varying risk characteristics and therefore requires a time-varying proxy (e.g. assets that have option-like payoffs);
 - the definition of growth or income is not appropriate (e.g. because the use of country/region specific proxy is more appropriate to alleviate concentration risk as is the case for DM Equity Multifactor); or
 - an access point has risk characteristics that fall outside the norm for an Opportunity after adjusting for leverage

Approval of proxies, both under the standard proxy system and when the standard proxy system is not used, will be in accordance with the Delegations Policy. In addition, where the standard proxy system is not used:

- Head of Asset Allocation will report to the CIO after each proxy approval. In addition, every six months Asset Allocation will provide a list of non-standard proxies approved during the prior six-month period to the Investment Committee and the Board for noting.

Approved by Chief Executive on 10 August 2015 as amended 14 April 2016, 19 June 2018, 2 December 2020, 11 January 2021, and 8 April 2021

Schedule 7: Constraints

Constraint		Limit	Definition or Clarification
Actual Portfolio Risk			
	Actual portfolio active risk	Volatility of return difference between actual portfolio and reference portfolio ≤ 8%	Volatility is the annualised standard deviation of expected return. This constraint limits the dispersion of the portfolio's active return.
Concentration			
	Single manager	≤ 25% of NAV	Applies to the total number of mandates for a manager (active or passive).
	Single private market manager	≤ 5% of NAV	Single manager limit of 25% still applies if the manager is awarded both private and public mandates.
	Single sector within a country	≤ 3% of NAV	Applies to value-add strategies only, covering both equity and debt ownership (excluding tilting and DM equity multifactor),
	Opportunity	≤ 10% of NAV	Excludes the following Active Returns Opportunities: strategic tilting, tactical credit, DM equity multifactor and direct arbitrage. These excluded Opportunities are subject to separate risk and/or capital constraints within an Internal Investment mandate and/or as approved separately by the Board.
Strategy-Specific			
Active Returns(ex Strategic Tilting			
Active Return - Strategic Tilting			
Rebalancing Thresholds			
Portf olio Com pled			

Liquidity Constraints	
Portfolio Completion	

* Example:

- a. *absolute risk limit: constrains our deviation from equities and bonds target weights*
- b. *relative risk limit: constrains bets within the asset class, e.g. EM equities % vs DM equities %*

Approved by the Board on 17 June 2015, 21 June 2016, 19 June 2018, 26 February 2019, 26 November 2020, 18 February 2021, and 23 November 2021, and 22 February 2024.

Schedule 8: Reporting Framework

Report	Reporting frequency required and to whom	Minimum Information required by the Board
Performance of the Reference Portfolio	Monthly to Investment Committee and Board	<ul style="list-style-type: none"> Performance last month, year to date, since inception.
Deviation from the standard proxy system	Every six months to Investment Committee and Board	<ul style="list-style-type: none"> Proxy used and reason for deviation from default position.
Performance of Value Adding Strategies	Available monthly to Investment Committee and reported to each scheduled Board meeting	<ul style="list-style-type: none"> Performance last month, year to date, since inception. Explanation required if 'unreconciled noise' is greater than 5bps per month or 20bps in the financial year to date. Active risk against risk budget. In respect of Strategic Tilting: Tilt positions; Any judgmental overlay and rationale for overlay Changes to models
Performance of the Actual Portfolio	Monthly to Investment Committee and reported to each scheduled Board meeting	<ul style="list-style-type: none"> Performance last month, year to date, since inception.
Compliance with investment constraints contained in Schedule 7	Each regular Investment Committee and Board meeting	<ul style="list-style-type: none"> Monthly actual absolute risk. Monthly actual relative risk. Monthly active manager risk used. Monthly Strategic Tilting active risk used. Liquidity levels if less than sufficient to meet commitments should the market move 3 EMV.
Policy breaches	<p>If medium or high under Learnings and Opportunities Process: immediately to Risk Committee and Board</p> <p>Otherwise: to subsequent Risk Committee, Audit & Risk Committee and Board meetings</p>	<ul style="list-style-type: none"> Details of breach and remedial action taken.
Material changes to Schedules of this policy	as part of the annual SIPSP review to the Risk Committee and Board meetings (the no surprises protocol also applies)	<ul style="list-style-type: none"> Details and reason for change.
Portfolio flexibility	Monthly to Investment Committee and quarterly to Board	<ul style="list-style-type: none"> Liquidity against expected average liquidity and the liquidity levels set out in Schedule 7.

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Report	Reporting frequency required and to whom	Minimum Information required by the Board
Event based reporting When liquidity falls below 3 EMV	Notice to the Board immediately	<ul style="list-style-type: none"> Liquidity against the liquidity levels set out in Schedule 7. Details of planned actions.
Event based reporting When liquidity falls below 2 EMV	Notice to the Board immediately	<ul style="list-style-type: none"> Liquidity against the liquidity levels set out in Schedule 7. Details of planned actions.

Review	At least every	To	Reason for review	Minimum Information required
Reference Portfolio review	5 years	Investment Committee and Board (for approval)	To ensure the Fund's risk and return is in line with the Fund's objective and the Board's risk appetite, and that the asset class benchmarks remain the best choice for the reference portfolio.	<ul style="list-style-type: none"> Summary of approach. Review of equilibrium risk and return assumptions. Review of asset class benchmarks. Rationale for any recommended changes. Risk-return impact.
Review of the cost of running Reference Portfolio	5 years	Investment Committee and Board (for approval)	To ensure our benchmark takes into account any changes in fees or transaction costs.	<ul style="list-style-type: none"> New versus old assumptions and rationale.
Review the impact of changes to the Fund's tax profile on the Reference Portfolio benchmark	5 years	GM Strategy and Shared Services, and GM Portfolio Completion	To ensure our benchmark takes into account any changes in the Fund's tax status.	<ul style="list-style-type: none"> Impact of any changes.

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Review	At least every	To	Reason for review	Minimum information required
Review of investment constraints contained in Schedule 7	5 years	Investment Committee and Board (for approval)	To ensure that the constraints under which we manage the actual portfolio are in line with the Fund's objective and the Board's risk appetite.	<ul style="list-style-type: none"> • Rationale for any recommended changes. • Impact of any changes.
Review of the total active risk budget contained in Schedule 10A	5 years	Investment Committee and Board (for approval)	To ensure that the expected average risk of the actual portfolio relative to the reference portfolio is in line with the Fund's objective and the Board's risk appetite.	<ul style="list-style-type: none"> • Summary of approach. • Rationale for any recommended changes. • Risk-return impact.
Review of Opportunity active risk budgets	5 years	Investment Committee and Board	To ensure the allocation of the active risk budget remains valid.	<ul style="list-style-type: none"> • Summary of approach. • Rationale for any recommended changes. • Risk-return impact.
Review	At least every	To	Reason for review	Minimum information required
Review of the proxy system	5 years	The Investment Committee and the Board (for approval)	To ensure that the proxy system is fit for purpose and all proxies reflect current views about long term risk.	<ul style="list-style-type: none"> • Summary of approach. • Rationale for any recommended changes. • Impact of any changes. •
Investment reviews	As determined by the Investment Committee	The Investment Committee and the Board	Periodic review of investments	<ul style="list-style-type: none"> • As per terms of reference specified by the Investment Committee.
Review of the portfolio flexibility framework	5 Years	The Investment Committee and the Board	To ensure that the portfolio flexibility framework operates as expected.	<ul style="list-style-type: none"> • Summary of framework. • Rationale for any recommended changes. • Impact of any changes.

Approved by the Board on 29 July 2013 as amended 19 June 2014, 17 June 2015, 14 April 2016, 9 August 2016, 19 June 2018, 26 November 2020, 24 June 2021, 22 June 2022, 3 August 2022 and 22 February 2024

Schedule 9: Legislative Compliance

The summary of New Zealand legislation set out below does not purport to be comprehensive or to provide legal advice. If you require any advice on these matters please contact the legal team.

When allocating investment risk we need to consider the legislation below.

Our governing legislation

- Crown Entities Act 2004
- New Zealand Superannuation and Retirement Income Act 2001

Other

- Official Information Act 1982. Our obligations in respect of this Act are covered in the *Communications and Engagement Policy*.
- Public Finance Act 1989
- Public Records Act 2005. Our obligations in respect of this Act are covered in the *Communications and Engagement Policy*.

Further Information

Further Information about the relevant sections of the legislation listed above can be obtained from our General Counsel.

Approved by the Chief Executive on 13 June 2011 and 8 December 2016

Schedule 10A: Risk Budget

The difference between the performance of the Actual Portfolio and the Reference Portfolio will be due to our Value Adding Strategies. The expected value-add will come with some additional volatility or active risk beyond the Reference Portfolio. The Board's expectation as to the level of this active risk is known as the Fund's total active risk budget.

The Guardians expect that the Actual Portfolio will return 1% p.a. more than the return of the Reference Portfolio over the long term after costs, with an active risk of 4%. The Board approves this total active risk budget of 4%.

Approved by the Board on 8 April 2014 as amended 14 April 2016

Schedule 10B: Investments Requiring Investment Committee Endorsement

The following table sets out thresholds that require the investments to be considered by the Investment Committee prior to implementation:

1. Direct Investments in NZ that are more than 0.5% of NAV.
2. Any investment greater than 1% of the Fund NAV and is not governed by an internal investment mandate.
3. Any investment where the Chair of the New Investments Group refers the Operational Risk Assessment (ORA) to the Investment Committee for consideration.

Approved by the Chief Executive on 19 June 2014 as amended 14 April 2016, 19 June 2018, 19 July 2019, 2 December 2020, 6 September 2022 and 6 March 2023